

**LARGE-SCALE RESIDENTIAL DEVELOPMENT
-LRD APPLICATION
PLANNING REPORT & STATEMENT OF
CONSISTENCY**

**FOR ALTERATIONS TO PERMITTED GA01 SHD AS PERMITTED
UNDER ABP REG. REF. 310418
FOR LANDS AT THE COAST, BALDOYLE, DUBLIN 13**

LRD0074

BSM

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**Brady Shipman
Martin**

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Making
**Built
Environment**

Client

The Land Development Agency

Date

July 2026

DOCUMENT CONTROL SHEET

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1. INTRODUCTION

This Planning Report has been prepared in support of a Large-Scale Residential Development (LRD) Application to Fingal County Council (FCC) on behalf of The Land Development Agency (the 'applicant').

This proposed LRD application is an amendment to the permitted Strategic Housing Development (SHD) permitted under ABP Reg. Ref. 310418-21 / FCC Reg. Ref. SHD/011/20, which under the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021, requires that any amendments required to a permission granted under SHD must be made via the LRD process.

The subject application site (hereafter called 'the site') is located at Baldoyle-Stapolin, Dublin 13, on lands formerly known as The Coast, Baldoyle. It is a site of approx. 3.3 ha, which forms part of the wider c.9.1ha development permitted under ABP Reg. Ref. ABP-310418-21. The proposed amendments comprise of alterations to the permitted Blocks A and D and Stapolin Square.

The subject site, since receiving permission for redevelopment has been acquired by the Land Development Agency (LDA), who identified the potential of the site to deliver a significant number of new homes including social and affordable, within an area of high demand which is well served by local services and excellent public transport links. In order to ensure that the scheme aligns with the remit and objectives of the LDA it is necessary to make some amendments to the permitted scheme. These amendments seek to bring the scheme into closer alignment with LDA objectives.

Amendments to a permitted SHD are provided for in the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021. Any application to amend a previously permitted SHD is submitted to the planning authority under the LRD procedure, with modified requirements under section 247(7) and 34(3C) of the Planning and Development Act 2000 (as amended) (the PDA 2000). The SHD process has been superseded by the Large-scale Residential (LRD) process under the Planning and Development (Amendment) (Large-scale Residential Development) Act 2021 and was enacted on 14th December 2021.

The LRD Act 2021 requires prospective applicants to have:

- Had an initial consultation meeting with the planning authority pursuant to Section 247 of the PDA 2000;
- Had a subsequent consultation meeting ('LRD Meeting') with the planning authority pursuant to Sections 32B and 32C of the amended Principal Act of 2000.
- Obtained an opinion ('LRD Opinion') from the Planning Authority in relation to the proposed large scale residential development pursuant to Section 32D of the amended Principal Act of 2000, inserted under Section 3 of the LRD Act 2021.

A pre-planning consultation meeting, as provided for under Section 247 of the Act, was held with Fingal County Council on 14th August 2025 (LRD0074). An LRD Opinion request was made to FCC on 23rd February 2026, with an LRD Opinion Meeting held on 19th March 2026 and subsequently an LRD Opinion issuing from Fingal County Council on 16th April 2026.

The lands are entirely zoned RA 'Residential Area', as per the Fingal County Development Plan 2017-2023 (Development Plan) and the Adopted Fingal Development Plan 2023-2029. As such, the use of these lands for residential purposes is provided for in the Core Strategy of the applicable Development Plan.

The development for which permission is sought, as set out in the statutory notices, is 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.

The development for which permission is being sought is set out in Section 6 of this report. This report examines the site location, context, planning history, and sets out clearly the extent and nature of the proposed development. This report also sets out a statement of consistency with all relevant policy and guidelines including the Fingal Development Plan 2023-2029, Baldoyle-Stapolin Local Area Plan May 2013 (now expired), and National & Regional Policy including Section 28 Guidelines.

This Planning Report should be read in conjunction with the other documentation (reports and drawings) accompanying this LRD Application, set out in the schedule included in the cover letter with this application.

2. SITE LOCATION AND CONTEXT

The subject site is approx. 3.3 ha, which forms 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 the subject of a permitted SHD development as per ABP Ref. 311016, to the east and south by the subject permitted lands, and to the west by the Dublin-Belfast railway line.

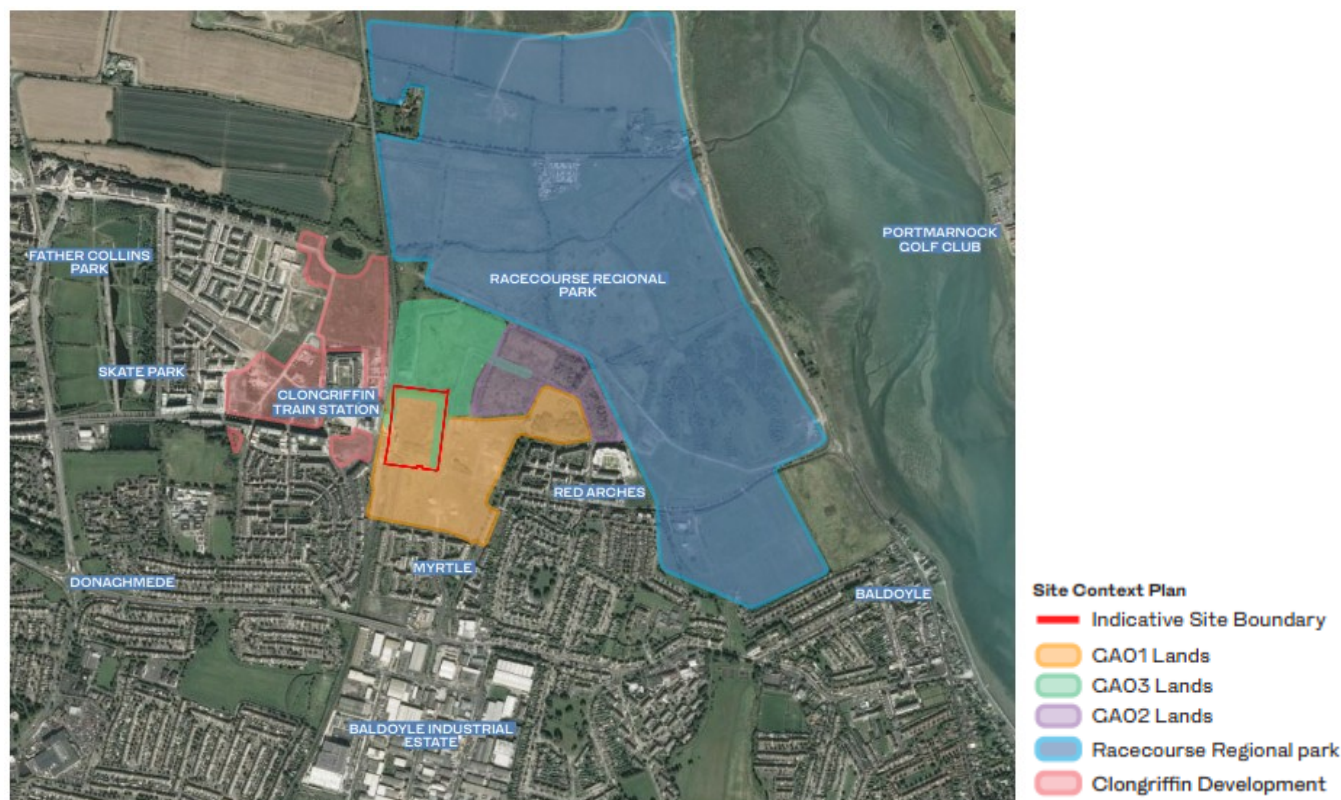


Figure 2-1: Indicative Subject Site in the Urban Context (Source: HJL, 2026).

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. FCC will deliver 'Baldoyle Racecourse' Regional Park as part of Development Plan and the expired Local Area Plan objectives at this location (as permitted under ABP-311315-21).

3. PLANNING HISTORY

The subject site has been subject to extensive planning history over the past number of years. Initially, the GA1 lands received permission under FCC Reg. Ref. F16A/0412 (ABP Reg. Ref. 248970) which was commenced and 117 no. units of which have been constructed and are occupied. This permission was subject to a number of amendment applications, as set out below, and most of which were progressed to bring the development in line with the subsequent SHD permission for GA1 lands (ABP-310418-21) which amended the later phases of the originally permitted development and which had not been commenced.

The LDA intend to develop the remainder of the GA1 site under the SHD permission and as amended by LRD 0015/S3, and further amended by this application.



Figure 3-1: Primary Planning Permissions (Indicative Site Area in Red) (Source: HJL, 2026).

FCC Reg. Ref. F16A/0412 (ABP Reg. Ref. 248970)

A grant of permission was issued by An Bord Pleanála on 23rd November 2017 for approximately 546 no. residential units (385 no. apartments and 161 no. houses) and a village centre comprising c. 1,917 sq.m of commercial floor space including a small supermarket, café, 4 no. retail units and a creche.

As part of this permitted development, pedestrian access to the train station is provided across a plaza known as Stapolin Square with steps and ramps to address the difference in levels, with the existing access to the station to be closed. A new open space of c.1.5ha is permitted at The Haggard to the northeast of the main part of the site. The permission was granted on appeal on 7 July 2017 by An Bord Pleanála and has a 10-year duration. Subsequent amendment applications to this permission have also been permitted as briefly set out below.

FCC Reg. Ref. F20A/0258- Blocks C4, C5 and D1

This permission amends the F16A/0412 parent permission. A final grant of permission was issued by Fingal County Council on 3 September 2020 for minor alterations to the permitted residential development, as permitted under F16A/0412 / ABP Ref: PL06F.248970. The proposed alterations related to Blocks C4, C5 and D1 (previously C6) only and primarily related to the alteration of external finishes and material of permitted housing. The units that are subject of this permission are constructed.

FCC Reg. Ref. F21A/0046- B3, B4, C3, C4, and C5

This permission amends the F16A/0412 parent permission. A grant of permission was issued by Fingal County Council on 27 April 2021 for proposed alterations to Blocks B3, B4, C3, C4, and C5 only and related to:

- Proposed alterations to some of the permitted Unit Types in respect of their external design which relates primarily to roof and porch design as well as external finishes, minor internal reconfiguration and removal or alteration of permitted solar panels.
- The introduction of new Unit Types in place of permitted units.
- Reduction of overall units by 5 no. units.

This was granted by FCC with a condition to exclude the proposed alteration of Unit Types and layout of Block C3 *“in the interest of visual and residential amenity”*. As a result of this permission the parent permission (F16A/0412 / ABP Ref. 248970) permits the development of 544 total units (a reduction of 2 no. units on the parent permission). This permission is superseded by the SHD for the relevant LDA Blocks.

FCC Reg. Ref F22A/0017- Blocks C2 and C3

This permission amends the F16A/0412 parent permission. A grant of permission was issued by Fingal County Council on 8 April 2022 for proposed alterations to Blocks C2 and C3 only and primarily relate to the alteration of external finishes and the material of permitted houses.

This permission is superseded by the SHD for the relevant LDA Blocks.

FCC Reg. Ref F22A/0434- Block C1

This permission amends the F16A/0412 parent permission. A grant of permission was issued by Fingal County Council on 06 January 2023 for proposed alterations to Block C1 and relates to:

- Reconfiguration of units to omit apartment units and the construction of 21 no. 4-bed terraced houses;
- Amendments to landscaping to remove communal open space granted under F16A/0412 and the addition of private gardens to the rear and a 2.4m wall between the development and Iarnród Éireann lands;
- The provision of 24 no. cycle parking spaces; and
- A reduction in width of Racecourse Close to 5.5m.

This permission is superseded by the SHD for the relevant LDA Blocks.

ABP Reg. Ref. ABP-310418-21 / FCC Reg. Ref. SHD/011/20 – GA01 (Parent Permission)

A grant of permission was issued by An Bord Pleanála on 22 August 2021 for alterations to the previously permitted F16A/0412 / ABP Reg. Ref. 248970 (as amended).

This SHD permission amended the F16A parent permission as well as extending into the area north of Stapolin Square. It consisted of 882 no. units comprising 747 no. apartments and 135 no. houses within 10 no. apartment blocks and 5 no. houses groups ranging from 2-15 no. storeys over a site of approx. 9.1ha of which the development area equated to 8.89ha.

Residential amenity facilities were permitted within Block A3 and D4 alongside external communal amenity space providing a total of c. 7,526 sq.m of residential amenity for future residents to avail off. Commercial development was also permitted within Block A1-A3 and D1-D3 comprising a gym, convenience retail unit, pharmacy, creche and 2 no. restaurant/ café units totalling c. 3,314 sq.m of non-residential uses.

A revised central civic plaza at Stapolin Square centrally located arounds Blocks A1-A3 and D1-D3 and a new linear park along Longfield Road was also proposed totalling c. 10,042 sq.m.

The proposed SHD application did not amend Blocks C4, C5 and C6 (previously referred to as block D1) which related to 99 no. houses which under construction or the permitted Haggard Park.

The permission was granted by An Bord Pleanála on 22nd October 2021 with a 10 year duration and has an expiry date of 1st December 2031 (allowing for Christmas period).

FCC Reg. Ref. LRD0007/S3– Block B

This permission amends the F16A/0412 parent permission. The LRD Amendment was granted permission by Fingal County Council in February 2023 and related to only Block B.

The proposed amendments consist of:

- The reconfiguration of permitted units omitting 28 no. apartments as permitted under F16A/0412 (as amended) and the addition of 26 no. houses resulting in the provision of 88 no. apartments (3-5 storey) and 54 no. houses (2-3 storey). This results in an overall total of 142 no. units, an overall reduction of 2 no. units on that permitted;
- The reconfiguration of the internal road layout as permitted under F16A/0412 (as amended);
- The removal of permitted basement below Blocks B1 and B2 and the provision of 170 no. car parking spaces and 262 no. cycle spaces at ground floor and surface; and
- The development of a linear park along Longfield Road.

Condition 3 of the FCC Final Grant limited the duration of the permission up to and including the 23rd of November 2027.

FCC Reg. Ref. F23A/0611

A final grant of permission was issued by Fingal County Council on 18th January 2024 for the construction of a new and upgraded wastewater pumping station located at the existing foul pumping station and the Haggard Park. The permission also includes for amendments to the permitted Haggard Park.

ABP Reg. Ref. TA06F.311016-21 / FCC Reg. Ref. SHD/016/21 – GA3

A grant of permission was issued by An Bord Pleanála on 23 November 2021 for a Strategic Housing Development (SHD) comprising c. 1,221 no. residential units and a creche of c. 452 sq.m at lands referred to as Growth Area 3 (GA3) lands within the Baldoyle Local Area Plan. This subject amendment application is located within these GA3 lands.

The permitted SHD is on a site of c. 6.89ha and comprises c. 1,221 no. residential apartments and duplexes consisting of 1 no. studio, 502 no. 1 bed units, 363 no. 2 bed units and 82 no. 3 bed units in 9 no. apartment blocks ranging in height from 2 to 15 no. storeys. Residential facilities including a creche of c. 452 sq.m is provided for within Block G4 and a restaurant/ cafe unit of c.205 sq.m is provided for within Block E3.

New central public space between Blocks E1-E2 and E3-E4 is permitted alongside a new linear space between Blocks G2-G3 and G5-G5 providing pedestrian and cycle connectivity from Longfield Road and to Racecourse Park to the north (permitted under ABP Reg. Ref. 311315).

LRD0015/S3- GA1 Amendments

An LRD Amendment application was lodged to amend the GA1 SHD permission. The proposed development sought to amend permitted SHD under ABP Reg. Ref. 310418 resulting in an overall reduction of 55 no. units from 882 (as permitted) to 827 no. units (as proposed) within GA1 lands. The proposed amendments consist of:

- Reduction in building height of Block A1 from an 8-6 no. storey building (as permitted) to a 7-6 no. storey building.
- Reduction in building height of Block D1 from an 9-6 no. storey building (as permitted) to a 7-6 no. storey building.
- Reduction in building height of Block D2 from an 8-6 no. storey building (as permitted) to a 7-6 no. storey building.
- Reduction in building height of Block D3 from an 15-5 no. storey building (as permitted) to a 10-5 no. storey building.

Facade and building form enhancements were also proposed. This resulted in an overall 341 no. units within the application site. All other elements of the GA1 lands remain as permitted under SHD ABP Reg. Ref. 310418. A final grant was issued by FCC on 5th July 2023.

LRD0016/S3- GA03 Amendments

An LRD Amendment application was lodged to amend the GA03 SHD permission. The proposed development sought to amend the SHD permitted under ABP Reg. Ref. 311016 resulting in an overall reduction of 97 no. units from 1,221 (as permitted) to 1,124 no. units (as proposed) within GA3 lands. The proposed amendments consist of:

- Block G1 - reduction in height from 10-4 no. storey building (as permitted) to 7-4 no storey building.
- Block G2 - reduction in height from 10-4 no. storey building (as permitted) to 7-4 no. storey building.
- Block G3 - reduction in height from 15-7 no. storey building (as permitted) to 10-6 no. storey building.
- Block G5 - reduction in height from 10-4 no. storey building (as permitted) to 7-4 no. storey building.
- Block E1 - reduction in height from 8-5 no. storey building (as permitted) to 7-5 no. storey building.

Facade and building form enhancements were also proposed. This resulted in an overall 830 no. units within the application site. All other elements of the GA3 lands remain as permitted under SHD ABP Reg. Ref. 311016. A final grant was issued by FCC on 5th July 2023.

LRD0073/S3E- GA01, Zone B Amendments

An LRD Amendment application was lodged to amend GA01 SHD permission, in respect of Zone B only. The proposed development sought to amend the SHD permitted under ABP Reg. Ref. 311016 resulting in an overall reduction of 2 no. units from 827 (as permitted) to 825 no. units (as proposed) within GA01 lands. The proposed amendments consisted of:

The proposed development will consist of amendments to Zone B of GA01 lands as permitted under ABP Reg. Ref. ABP-310418-21 / FCC Reg. Ref. SHD/011/20. This will involve the amendment of permitted house units (the 2 no. eastern most units in Block B3 and 4 no. eastern most units in Block B4) to reconcile with as the built condition. This includes the omission of 2 no. 3-bed housing unit, the alteration of 1. no 3-bed unit to a 2 bed-unit and the increase in rear garden and provision of rear access for 1 no. unit. This results in the overall loss of 2 units. There are no amendments to the rear gardens or constructed boundaries of the adjacent units on Stapolin Avenue.

All other elements of the GA01 lands remain as permitted under SHD ABP Reg. Ref. 31018. A final grant was issued by FCC on 3rd February 2026.

4. PRE-PLANNING CONSULTATION

Both the context and approach to the application site and the emerging design rationale for the proposed development, have been subject to considerable consultation with the wider Fingal Team as part of the Development Agreement Process and with the FCC Planning Department under Section 247 of the *Planning and Development Act 2000*, as amended.

A stage 1 pre-application meeting for the proposed development was held on the 14th of August 2025 via Microsoft Teams. An LRD Opinion Meeting was held on the 19th March 2026.

5. STATEMENT OF CONSISTENCY

The key provisions of national (including relevant Section 28 guidelines) and regional planning policy as it relates to the proposed development is set out in the following sections. A detailed consideration of the relevant policies of the Fingal County Development Plan 2023-2029 is contained in Section 6 of this Report.

5.1 NATIONAL AND REGIONAL POLICY

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

- Delivering Homes, Building Communities: An Action Plan on Housing Supply and Targeting Homelessness
- Project Ireland 2040 - National Planning Framework First Revision
- Climate Action Plan 2025
- Eastern and Midland Regional Assembly - Regional Spatial & Economic Strategy (RSES)
- Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)
- Planning Design Standards for Apartments: Guidelines for Planning Authorities (2025);
- Urban Development and Building Heights Guidelines for Planning Authorities (December 2018)
- Design Manual for Urban Roads and Streets (2019)
- Guidelines for Planning Authorities on Childcare Facilities (2001)
- Transport Strategy for the Greater Dublin Area 2022-2042

The planning policy in the subject permission relates to the amendments proposed for the previously permitted SHD (ABP Reg. Ref. 310418-21 / FCC Reg. Ref. SHD/011/20). It is considered that the scheme as permitted remains consistent with the relevant Guidelines, as it was permitted under and as have been updated since.

5.1.1 DELIVERING HOMES, BUILDING COMMUNITIES: AN ACTION PLAN ON HOUSING SUPPLY AND TARGETING HOMELESSNESS

Delivering Homes, Building Communities 2025-2030: Action Plan on Housing Supply and target Homelessness is the Government's latest Housing Plan, launched in November 2025 (the Delivering Homes Plan). This replaces the previous *Housing for All* (2021) Plan.

The new Delivering Homes Plan's aim targets the construction of 300,000 homes up to 2030, including 72,000 social homes and 90,000 affordable housing supports and there is no upper limit on housing delivery envisaged over the plan period.

The Plan contains two key pillars:

1. **Pillar 1: Activating Supply**

is about removing structural barriers to homebuilding — unlocking land, reforming planning, delivering infrastructure and creating conditions for investment. It also involves boosting construction capacity, adopting modern methods of construction and addressing vacancy and dereliction to bring homes back into use.

2. **Pillar Supporting People**

is aimed squarely at making homes accessible and affordable, particularly those who are most at-risk of homelessness or those waiting on our housing lists around the country. It laser focuses on tackling homelessness and precarious living conditions, protecting children and families, increasing social and affordable housing output and seriously improving rental security. It supports homeownership — giving new buyers a chance to put down roots, while revitalising villages, towns and cities

The Delivering Homes Plan identifies a key role for the Land Development Agency in delivery housing supply with additional equity funding of €2.5 billion to be provided to the LDA, bringing total funding to €8.75 billion. It sets out that the LDA are active on over 40 sites and working on a pipeline of 27,000 units which include the Stapolin lands.

The Plan expands the remit of the LDA enabling them to operate in a wider range of towns to deliver mixed tenure communities including more social homes and private housing within larger developments. The LDA will also continue to develop State-owned lands and strategically assemble land from both public and private sources to create a more stable and affordable housing market.

The subject site has been acquired by The Land Development Agency with a view to delivering approximately 1,900+ homes altogether (including future GA03 Lands). Phase 1 which is due to commence shortly is delivering 279 no. homes (Blocks C1, C2, C3 and B3 and B4) and Phase 2, which is subject of this application, will deliver 596 no. homes, completing the GA01 permission. These will be affordable (cost rental) homes delivered by the LDA.

5.1.2 PROJECT IRELAND 2040 - NATIONAL PLANNING FRAMEWORK (FIRST REVISION)

Project Ireland 2040 is the Government's plan to 're-imagine' Ireland and prepare for the future. The National Planning Framework (NPF) was initially published in 2018 and following a decision of Government in June 2023, the preparation of a revised National Planning Framework was commenced. This was completed in early 2025 with the Government approving the First Revision on 8th April 2025 and subsequently it was approved by both Houses of the Oireachtas.

Project Ireland 2040 seeks to achieve ten strategic outcomes (common to both Plans), building around the overarching themes of wellbeing, equality and opportunity, including:

1. Compact Growth
2. Enhanced Regional Accessibility
3. Strengthened Rural Economies and Communities
4. Sustainable Mobility
5. A Strong Economy, supported by Enterprise, Innovation and Skills
6. High-Quality International Connectivity
7. Enhanced Amenity and Heritage
8. Transition to a Low Carbon and Climate Resilient Society
9. Sustainable Management of Water and other Environmental Resources
10. Access to Quality Childcare, Education and Health Services

In April 2025, the Houses of the Oireachtas approved the adoption of the First Revision of the National Planning Framework which builds on the NPF which was initially drafted in 2018, to reflect the changing needs of Ireland in the time that has elapsed since. The revised NPF identifies that, as per updated projections, the population of Ireland will increase to approximately 5.7 million by 2030 and to 6.1 million by 2040, which is an increase of 250,000 people over that planned for in 2018. The scale of growth that is projected in Ireland to 2040 coupled with the need to transition to a lower carbon society requires an increased delivery of housing and the improved integration of land use and transport.

One of the key objectives of the NPF relates to compact growth. The plan seeks to carefully manage the sustainable growth of compact cities, towns and villages and to add value and create more attractive places in which people can live and work. The NPF identifies that activating *“strategic areas and achieving effective density and consolidation, rather than more sprawl of urban development”* (page 6) as a top priority.

With regards to Dublin the NPF identifies that the city needs to *“accommodate a greater proportion of the growth it generates within its metropolitan boundaries, while offering improved housing choice, transport mobility and quality of life”* (page 31).

Having regard to the proposed amended development, the following National Policy Objectives (NPO's), *inter alia*, are highly relevant:

- **NPO 4:** *“A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs”.*
- **NPO 7:** *“Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth”.*
- **NPO 8:** *“Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints and ensure compact and sequential patterns of growth”.*
- **NPO 10:** *“Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up footprint of the five cities or a metropolitan town and ensure compact and sequential patterns of growth.”.*
- **NPO 12:** *“Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being”.*

- **NPO 20:** *“In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.”.*
- **NPO 37:** *“Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.”.*
- **NPO 38:** *“Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.”.*
- **NPO 43:** *“Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”.*
- **NPO 45:** *“Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development.”.*
- **NPO 67:** *“Support the circular and bio economy including in particular through greater efficiency in land and materials management, promoting the sustainable re-use and refurbishment of existing buildings and structures while conserving cultural and natural heritage, the greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development.”.*

The NPF notes that half of the future (50%) population and employment growth is to be included in the existing five cities and suburbs, including Dublin. The proposed amended development will provide for an additional 68 no. high-quality affordable (cost rental) homes, in addition to the already permitted 582 units within Blocks A and D and an overall development of 893 homes, within the GA01 SHD permission, which will assist with the continued growth of the area.

The permitted layout has been carefully considered to promote lower car usage given the site’s location to high accessibility transport links. The proposed development will provide a safe and secure development designed in compliance with national, regional and local planning policy.

The development is now being progressed by The Land Development Agency (LDA). In respect of the LDA the NPF includes NPO 21 which states that *‘The Government will support the LDA, in association with Local Authorities, to fulfil its statutory mandate to deliver a significant number of homes on State lands in major mixed tenure developments, with a particular focus on brownfield and infill urban sites in the five main cities and regional centres as a priority’*. This proposed amendment to permitted development at lands at Stapolin/Baldoyle is fully aligned with this objective with the LDA working to deliver significant housing in Dublin.

The proposed development is considered consistent with the National Policy Objectives of the Planning Framework 2040 First Revision.

5.1.3 CLIMATE ACTION PLAN 2025

The Climate Action Plan 2025 (CAP25) is the fifth annual update to Ireland’s Climate Action Plan 2019 and sets out the roadmap to deliver on Ireland’s climate ambition. Climate Action Plan 2025 builds upon last year’s Plan by refining and updating the measures and actions required to deliver the carbon budgets and sectoral emissions ceilings. The Plan provides a roadmap for taking actions to reduce greenhouse gas emissions by 51% by 2030 and achieve climate neutrality by no later than 2050.

CAP25 strengthens Ireland's commitment to ensuring a just transition through its four principle framework, focusing on evidence-based planning, skills development, equitable cost distribution, and social dialogue.

The Climate Action Plan 2025 includes a set of Actions that will support the delivery of Ireland's climate action ambition. These actions are set across a range of chapters and disciplines. The proposed development has been designed to assist in achieving actions and policies as set out in the Climate Action Plan 2025 (CAP25).

In terms of transport, CAP25 pledges to adopt the 'Avoid – Shift – Improve' approach, and targets a 50% reduction in emissions by 2030. It also aims to:

- TR/25/7: Advance roll-out of walking/cycling infrastructure in line with National Cycle Network and Cycle Connects plans.
- TR/25/9: BusConnects Dublin: At least one Core Bus Corridor approved at Approval Gate 3 and start construction.
- TR/25/23: Prioritise the delivery of further phases of the BusConnects Network Design Plan.

With particular relevance to this residential development, CAP25 identifies that 'the residential sector is on track to meet its 2025 sectoral emissions ceiling. In respect of actions in 2025 identifies 'BE/25/4 : Publish bill to transpose Energy Performance of Buildings Directive'.

As such, the permitted development has taken into consideration the Climate Action Plan and measures have been included within the design of the development to reduce carbon emissions.

It is noted that the Department of Climate, Energy and the Environment are currently undergoing a public consultation period with regards to the updating the Climate Action Plan, which is planned for publication later this year.

5.1.4 EASTERN AND MIDLAND REGIONAL ASSEMBLY – REGIONAL SPATIAL & ECONOMIC STRATEGY

The Regional Spatial and Economic Strategy 2019 - 2031 (RSES) is a strategic plan and investment framework to shape the future development of the Eastern & Midland Region to 2031 and beyond. The region is the smallest in terms of land area but the largest in population size and is identified as the primary economic engine of the state.

The RSES identifies that the region 'is home to over 800,000 households, with 4 out of 5 living in conventional housing while apartments account for around 18% of our housing stock. One of the challenges facing the region is the continued growth rates of household formation coupled with a severe slowdown in the development of new housing stock during the economic recession, resulting in housing supply and affordability pressures in both sale and rental markets, particularly in Dublin and urban areas but affecting all of the region'.

The RSES is underpinned by key principles that reflect the three pillars of sustainability; Social, Environmental and Economic, and expressed in a manner which best reflects the challenges and opportunities of the Region. The plan identifies that the central need is for the RSES to be people focussed, as 'quality of life' encapsulates strong economic output and stability, good environmental performance and a good standard of living for all.

The subject site is located within the Dublin Metropolitan Area (DMA), as designated by the RSES. The Metropolitan Area Strategic Plan (MASP) which is part of the RSES seeks to focus on a number of large scale strategic sites, based on key corridors that will deliver significant development in an integrated and sustainable fashion. To achieve the overall vision the MASP identifies a number of guiding principles of sustainable development within the DMA –

- Integrated Transport and Land Use - To focus growth along existing and proposed high quality public transport corridors and nodes on the expanding public transport network and to support the delivery and integration of 'BusConnects', DART expansion and LUAS extension programmes, and Metro Link, while maintaining the capacity and safety of strategic transport networks.

In relation to Baldoyle the RSES identifies Clongriffin-Belmayne and Baldoyle - Stapolin as being within Dublin City and its suburbs and forming part of the 'North Fringe' which offers large scale urban expansion creating new communities along the North-South (DART) Strategic Development Corridor (Northern/south-eastern commuter lines and DART expansion programme).

The RSES sets out the North – South Corridor (DART+ Coastal North Project) as a key infrastructure project to be delivered and which will increase capacity on the northern commuter line and support ongoing large-scale urban expansion of the North Fringe lands and Donabate. Planning permission was granted for this in August 2025 with engagement taking place with the applicant and Irish Rail.

Corridor	Residential	Employment/ Mixed Use	Phasing/Enabling infrastructure
North-South corridor (DART) Population capacity Short 31,000 Medium 13,000 Long 7,000 Total 51,000	North Fringe – large scale urban expansion creating new communities at Clongriffin-Belmayne (Dublin City) and Baldoyle-Stapolin (Fingal)	Completion of mixed-use districts with retail and service provision.	Short to medium term Access to rail station, bus upgrades, new road connections, drainage, parks and social infrastructure

The NPF also sets out ambitious targets to achieve compact growth with 50% of housing to be provided within or contiguous to the built-up area of Dublin city and suburbs. To achieve this *'the MASP identifies strategic residential and employment corridors along key public transport corridors existing and planned, that contain development opportunities. These include; ... large scale urban expansion on the North Fringe of the city...'*

The RSES goes on to state that The DART Expansion Programme, to be delivered by 2027 will increase capacity on the northern commuter line and support ongoing large-scale urban expansion of the North Fringe lands and Donabate.

Policy Objectives relating to Housing Delivery include:

- **RPO 3.2:** *"Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the built-up area of Dublin city and suburbs and a target of at least 30% for other urban areas."*
- **RPO 4.3:** *"Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built-up area of Dublin City and suburbs and ensure that the*

development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport project.”

- **RPO 5.4:** *“Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the ‘Sustainable Residential Development in Urban Areas’ ‘Sustainable Urban Housing; Design Standards for New Apartments’ Guidelines, and ‘Urban Development and Building Heights Guidelines for Planning Authorities.’”*
- **RPO 5.4:** *“Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing; Design Standards for New Apartments’ Guidelines, and Draft ‘Urban Development and Building Heights Guidelines for Planning Authorities’.”*
- **RPO 5.5:** *“Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.”*

The MASP identifies ‘Strategic residential and employment development corridors’ in order to create sustainable compact communities with improved housing choice, access to social and economic opportunities, enhanced services and amenities for the residents of Dublin.

5.1.5 SUSTAINABLE RESIDENTIAL DEVELOPMENT AND COMPACT SETTLEMENT GUIDELINES FOR PLANNING AUTHORITIES (2024)

These Guidelines replace the *Sustainable Residential Development in Urban Areas Guidelines for Planning Authorities (2009)* which in turn replaced the Residential Density Guidelines in 1999.

The Guidelines set out policy and guidance in relation to the planning and development of urban and rural settlements, with a focus on sustainable residential development and the creation of compact settlements.

Density

Since the publication of the Residential Density Guidelines 1999 and subsequent 2009 guidelines, planning authorities have been recommended to promote increased residential densities at appropriate locations. The 2024 Guidelines note that *‘given the NPF priorities for compact growth [...], the Government considers that it is necessary to expand on the number of density bands contained in the 2009 Guidelines in order to ensure that densities are efficient while, at the same time, tailored to settlement context.’*

Table 3.1 of the Guidelines sets out the area and density ranges applicable to Dublin and Cork City and Suburbs. The subject site is considered as ‘City – Urban Neighbourhood’ as follows:

City - Urban Neighbourhood

The city urban neighbourhoods category includes: (i) the compact medium density residential neighbourhoods around the city centre that have evolved overtime to include a greater range of land uses, (ii) strategic and sustainable development locations⁷, (iii) town centres designated in a statutory development plan, and (iv) lands around existing or planned high-capacity public transport nodes or interchanges (defined in Table 3.8) – all within the city and suburbs area. These are highly accessible urban locations with good access to employment, education

and institutional uses and public transport. It is a policy and objective of these Guidelines that residential densities in the range 50 dph to 250 dph (net) shall generally be applied in urban neighbourhoods of Dublin and Cork.

In terms of Accessibility the site is classified as a High-Capacity Public Transport Node or Interchange being within 1 km of one of the following;

- BusConnects Core Bus Corridor,
- Clongriffin Station Dart+ Railway Station

In this respect, a permitted density of c. 99 units per hectare was already achieved under ABP-310418-21 / FCC Reg. Ref. SHD/011/20 which is in line with the density set out above. This is discussed further in Section 6 of this Report.

Section 5 of the Guidelines sets out development management standards which reinforces that the planning authority '*is required to have regard to the policies and objective of the Guidelines and to apply the specific planning policy requirements (SPPRs)*'.

The guidelines have introduced 4 no. SPPRs in relation to separation distances (SPPR 1), minimum private open space standards for houses (SPPR 2), car parking (SPPR 3) and cycle parking and storage (SPPR 4). SPPR 2 does not apply to the proposed development as it is applicable to houses only.

Further details on the *Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024)* in relation to the proposed development is set out below in Section 6 of this Report.

5.1.6 PLANNING DESIGN STANDARDS FOR APARTMENTS GUIDELINES FOR PLANNING AUTHORITIES, 2025

The Planning Design Standards for Apartments: Guidelines for Planning Authorities, 2025 ('the 2025 Guidelines') was published in July 2025 by the Minister of Housing, Local Government and Heritage under Section 28 of the Planning and Development Act 2000, as amended. These Design Guidelines supersede previous design standards including the Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities 2022 (updated July 2023), which were the applicable guidelines at the time the original SHD permission was granted.

It is noted that the 2025 Guidelines are currently subject to a Judicial Review, although they remain in force. The Department has published the Draft National Planning Statement on Planning Design Standards for Apartments 2026 which will ultimately supersede the 2025 Guidelines. The standards contained within both documents are largely the same.

The Design Standards are consistent with the most up to date housing target set out in the NPF that have adjusted based on increasing pressure to accelerate the delivery of housing in a compact and sustainable way. Specific Apartment Standards address apartment mix, internal space standards, dual aspect ratios, floor to ceiling heights, apartment to stair/life core ratios, storage space, and amenity space.

The current design standards came into effect after permission was granted for the parent permission and have been applied subsequently to the subject application. The design standards today generally provide more flexibility for the development of apartments, and the proposed scheme has been designed such that it exceeds the standards set by the current guidelines as it was granted and is now amended consistent with previous standards as set out in the Development Plan.

Please refer to the Housing Quality Assessment (HQA), prepared by HJL Architects which demonstrate the compliance of the proposed units within the relevant guidelines, design standards and SPPRs as appropriate.

See Section 6 of this report for further details of how the proposed development in accords with the Design Guidelines.

Another key update in the Guidelines is the ability to reduce car parking standards. The Guidelines identify that *“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 proposed development comprises of a total of 378no. car parking spaces (25no. spaces of which are outside the redline, however, these spaces were permitted for commercial use as per the parent permission FCC Reg. Ref. SHD/011/20), of which 76no. spaces will be dedicated to the retails, gym and creche elements of the development. The amendment applications for Blocks A and D will be provided with a total of 299no. car parking spaces. All car parking spaces will be located at the undercroft levels of the blocks. The development's overall car parking provision equates to a ratio of 0.50 space per unit excluding car share spaces. An additional 5no. car share spaces are provided to serve the residents of the proposed development.

The TIA prepared by Cronin Sutton, provides further details and a justification for this level of car parking as it relates to the site's accessibility to public transport and employment zones.

With regards to cycle parking, a provision of 1 bicycle parking space per bedroom and 1 visitor bicycle parking space for every 4 no. units is provided in the proposed amendments. This exceeds the standards as set out in the Fingal County Development Plan and substantially meets the requirements of the Sustainable Urban Housing Guidelines, previously referenced, with the exception of visitor parking which proposes an initial provision of 1 space per 4 no. units, with the remainder being provided on a phased approach. The Transport & Traffic Assessment (Section 6.5) prepared by Cronin Sutton provides details and a justification for the level of cycle parking proposed.

The subject site represented a significant development on highly accessible, undeveloped residentially zoned lands in the North Fringe of Dublin City and within the Fingal County Council area, and as such represents a project that is fully supported by these Guidelines.

Details of the design Housing Quality Assessment (HQA) illustrates in tabular format how each apartment unit within the proposed scheme meets or exceeds the relevant standards as set out in the Guidelines. The proposed amendments to the permitted development are considered fully compliant with the Apartment Guidelines 2025 and the Fingal Development Plan Standards as set out in detail in Section 6 of this report.

5.1.7 URBAN DEVELOPMENT AND BUILDING HEIGHTS GUIDELINES FOR PLANNING AUTHORITIES (DECEMBER 2018)

The Urban Development & Building Height Guidelines for Planning Authorities (the Guidelines) identify that as reflected in *“the National Planning Framework that there is significant scope to accommodate anticipated population growth and development needs, whether for housing, employment or other purposes, by building up and consolidating the development of our existing urban areas”* and that *“securing compact and sustainable urban growth means focusing on reusing previously developed ‘brownfield’ land, building up infill sites (which may not have been built on before) and either reusing or redeveloping existing sites and buildings, in well serviced urban*

locations, particularly those served by good public transport and supporting services, including employment opportunities.”

The Guidelines reference NPO 13 (from the NPF) states that:

“... in urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria that seek to achieve well designed high quality outcomes in order to achieve targeted growth. These standards will be subject to a range of tolerance that enables alternative solutions to be proposed to achieve stated outcomes, provided public safety is not compromised and the environment is suitably protected” (Page 5).

The proposed amendments do not propose any increase in height in the form of additional storeys above what has already been permitted. The parapet heights have been lowered across the scheme by 400mm by the reduction of Level 1 floor to floor height. The addition of the plant screen results in an increase in height of 1800mm to the top of the screen, and 1400mm over the previously permitted maximum height for Block A1 only.

5.1.8 DESIGN MANUAL FOR URBAN ROADS AND STREETS (DMURS) (2019)

The Design Manual for Urban Roads and Streets (DMURS) was adopted by the Department of Transport and the Department of Environment (now Housing) in 2013 and updated in 2019. It sets out design guidance and standards for constructing new and reconfiguring existing urban roads and streets in Ireland. It also outlines practical design measures to encourage more sustainable travel patterns in urban areas. The Traffic Assessment, prepared by DBFL on the permitted development set out how the scheme was in compliance with DMURS.

The proposed amendments have been informed by further interrogation of the permitted design and proposed operations, servicing and access. Cronin Sutton Consulting Engineers along with the rest of the design team have interrogated the DMURS principles to ensure the layout provides a high-quality development which integrates with an established urban development.

The design aims to:

- Provide a connected network with strong permeability for pedestrians for the benefit of future and existing residents alike;
- Facilitate high levels of walking and cycling through prioritisation, shared space and the provision of quality infrastructure;
- Limit impact on the surrounding road network and enhance it where possible;
- Provide access to existing public transport networks in the area;
- Limit the impact on the surrounding area; and
- Ensure the safety of all users across all modes.

The Traffic & Transport Assessment prepared by Cronin Sutton Consulting Engineers demonstrates that the amendments to the permitted scheme have been designed to comply with the standards and principles set out in DMURS, as well as the National Cycle Manual and the FCC Development Plan and reflect the balance of modes accessing the site.

5.1.9 TRANSPORT STRATEGY FOR THE GREATER DUBLIN AREA 2022-2042

This strategy provides the framework for the planning and delivery of infrastructure and services in the Greater Dublin Area up to 2042 and replaces the previous Transport Strategy for the Greater Dublin Area 2016 – 2035. The framework aims to *“To provide a sustainable, accessible and effective transport system for the Greater Dublin Area*

which meets the region's climate change requirements, serves the needs of urban and rural communities, and supports the regional economy". The transport measures encompass the strategy's principles of effective, efficient and sustainable transport whilst helping to reduce modal share of car based commuting to a maximum of 45%.

To achieve these principles, future developments must:

- Have transport as a key consideration in land use planning – integration of land use and transport as to reduce the need to travel, reduce the distance travelled, reduce the time taken to travel, promote walking and cycling especially within development plans;
- Protect the capacity of the strategic road network;
- Ensure a significant reduction in share of trips taken by car, especially those trips which are shorter or commuter trips;
- Take into account all day travel demand from all groups; and
- Provide alternate transport modes in order to reduce strain on M50 as current increase in traffic is unsustainable.

The strategy also highlights how it is necessary for the expansion of attractive public transport alternatives to car travel, to reduce congestion and emissions and enable the transport sector to cater for the demands associated with longer term population and employment growth in a sustainable manner.

5.2 LOCAL PLANNING POLICY

The subject site is located within the administrative area of Fingal County Council. The Fingal County Development Plan 2023-2029 sets the statutory planning policy for development within the Fingal Boundary, having regard to national and regional plans and policies. The Development Plan provides the planning policy framework and design and development standards for development of the subject lands.

The proposed development supports the achievement of FCC Development Plan objectives in a number of key areas which are discussed below. The consideration of the scheme in respect of the relevant development management standards, set out in Chapter 14, is included in Section 6 of this Report.

Fingal Development Plan 2023-2029

The *Fingal Development Plan 2023-2029* (the Fingal Development Plan) is the local planning policy framework that governs future development of the subject site. This section discusses the specific provisions of the Development Plan in relation to development management standards, Core Strategy, Land Use Zoning, another general policy considerations relevant to the proposed development. Policy objectives relevant to the proposed development are listed below and referenced where applicable throughout.

Throughout this plan there are 4 no. 'cross-cutting' themes:

- *Climate Action*
- *Healthy Place-making and Sustainable Development*
- *Social Inclusion*
- *High-Quality Design*

Strategic Vision

The strategic vision for Fingal is set out to shape the sustainable future growth around the County throughout the plan period. The vision the authority has at the core is *“healthy placemaking, building cohesive and sustainable communities, where our cultural, natural and built environment is protected.”*

Section 1.4 of the Development Plan lays out the 13 no. Strategic Objectives to achieve a ‘more sustainable and resilient County’. The following 4 objectives are applicable to the proposed development:

- **Objective No. 2:** *“Continue the development of a network of well-serviced, well-connected, sustainable neighbourhoods which have a range of facilities, a choice of tenure and universally designed adaptable house types, promote social inclusion and integration of all minority communities.”.*
- **Objective No. 3:** *“Ensure new residential development is of the highest quality, endorsing the principles of healthy placemaking, enabling life cycle choices and physical, community, recreation and amenity infrastructure are provided in tandem, to create sustainable, healthy, inclusive and resilient communities”.*
- **Objective No. 7:** *“Ensure the highest quality of public realm and urban design principles are applied to all new developments, ensuring developments contribute to a positive sense of place and local distinctiveness of an area and facilitate the universal design approach into all developments.”.*
- **Objective No. 12:** *“Protect, conserve and enhance the built and cultural heritage of Fingal, through promoting awareness, utilising relevant heritage legislation and ensuring good quality urban design principles are applied to all new developments. The principle that well planned and integrated development enhances the sustainability, attractiveness and quality of an area should be at the centre of any proposal.”*

Core Strategy, Settlement Hierarchy and Housing Strategy

Chapter 2 of the Development Plan sets out the Core Strategy and Settlement Strategy for County Fingal. It identifies the quantum, location and phasing of development for the plan period that is consistent with the regionally defined population targets and settlement hierarchy.

Each settlement possesses a unique role within the context of Fingal. Ballydoyle is one of the Dublin City and Suburbs Consolidation Areas within the Fingal Settlement Hierarchy (see Table 2.21 in the Development Plan). Continued Compact growth in/near existing settlements contributes to the viability of services, shops and public transport, increasing housing supply and enabling more people to live closer to employment and recreational opportunities.

This amendment application proposes 68 no. additional units to the original development permitted under ABP Reg. Ref. 310418-21 / FCC Reg. Ref. SHD/011/20. Therefore, the proposed development contributes to the core strategy set out in the Development Plan.

The proposed development aligns with the relevant policies and objectives by incorporating sustainable, energy-efficient, and climate-resilient design solutions. It prioritises the use of SuDS and green infrastructure to effectively manage surface water, improve water quality, and reduce flood risk, supporting long-term environmental resilience. Additionally, the development adopts high-quality lighting design that limits light pollution, protects biodiversity, and employs energy-efficient technologies, reinforcing the commitment to sustainability and responsible urban design.

Land-Use Zoning

The subject site is zoned RA ‘Residential Area’ under the Development Plan. The objective of RA zoned lands is to *‘provide for new residential communities subject to the provision of the necessary social and physical infrastructure.’*

(as Shown in Figure 5-1). Given the primary purpose of the subject application is to provide for residential uses the proposed development is clearly consistent with the land-use zoning.

Further detail from the Development Plan states that RA zoning will: *“Ensure the provision of high quality new residential environments with good layout and design, with adequate public transport and cycle links and within walking distance of community facilities. Provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.”*

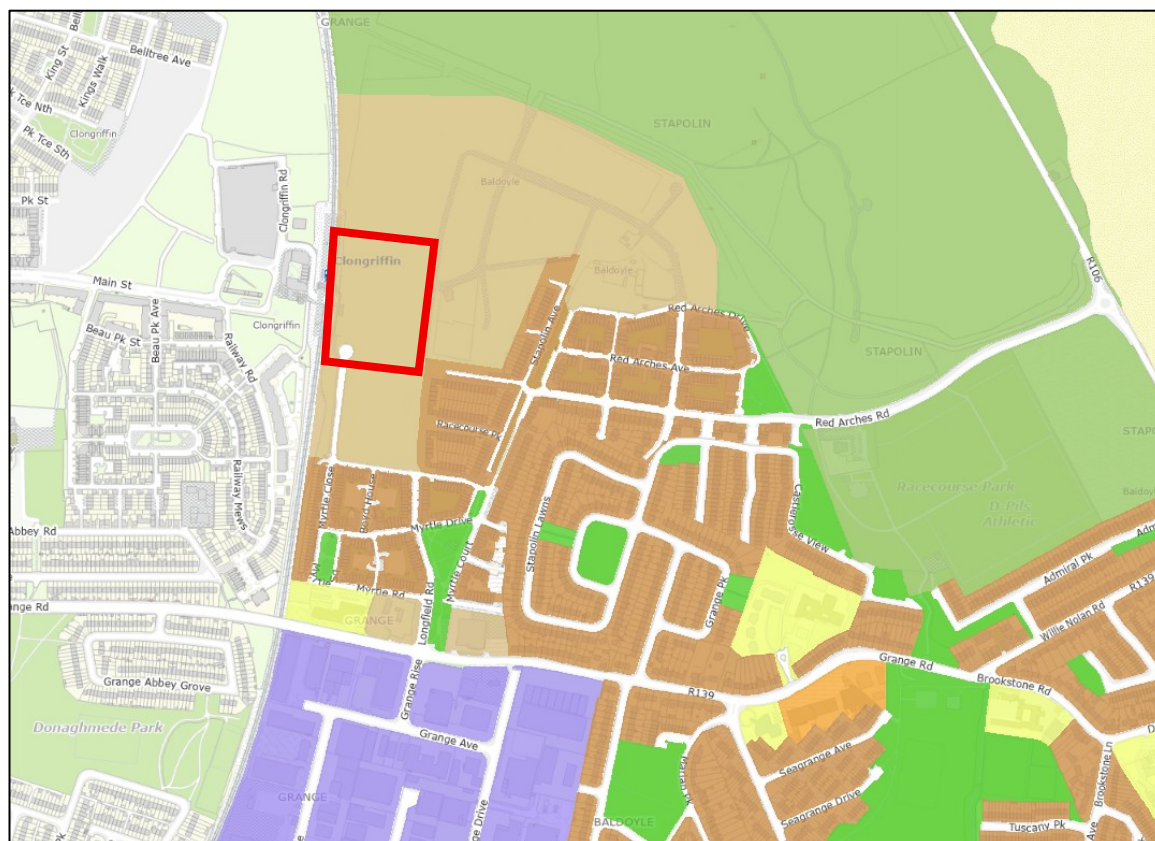


Fig 5-1- Zoning Map with Indicative Site Boundary in red.

Development Management Standards

Chapter 12 of the Development Plan sets out a range of standards in relation to residential developments including: separation distance, private open space, internal standards, parking etc. The proposed amendments are in accordance with relevant standards, as they apply and relate primarily to amendments to the internal configuration of the permitted blocks and to address requirements of conditions of the permitted grant of permission. Section 14.6 Design Criteria for Residential Development in Fingal, Section 14.7 Apartment Development Standards and Section 14.8 Housing Development Standards include relevant objectives as listed below in Error! Reference source not found..

Baldoye-Stapolin Local Area Plan (LAP) 2013 (Now Expired)

The *Baldoye-Stapolin LAP 2013-2019* (the LAP) was adopted on May 2013 by FCC. The Council Members approved further an extension of life for the LAP, having considered the Chief Executive's Report at a Council meeting on the 12 March 2018 for a further period of 5 years from the 12 May 2018 to the 11 May 2023.¹ The LAP has now expired.

¹ <http://meetings.fingal.ie/ieListDocuments.aspx?CId=129&MId=4933>

The LAP set out a detailed strategy for the lands which influenced the permitted development. While the LAP is now expired it is considered that the proposed minor amendments do not alter the intent of the permitted scheme as was set out in the LAP.

The Development Plan was used as the basis of guiding this planning application. This includes topics such as zoning, Baldoyle Stapolin 'map-based objectives' for the lands, objectives for the Local Centre at Stapolin Square, green infrastructure, housing mix objectives, density, heights, phasing and infrastructure.

6. PROPOSED DEVELOPMENT

6.1 OVERALL DESIGN RATIONALE & AMENDMENTS

Since the granting of permission on this site the Land Development Agency has acquired the site. The proposed amendments come as a result of a full review of the Phase 2 (Blocks A-D) of the permitted scheme by the LDA. The LDA has recognised the potential of the site to deliver a significant number of new social and affordable homes within an area of high demand which is well served by local services and excellent public transport links. In order to ensure that the scheme aligns with the remit and objectives of the LDA it is necessary to make some amendments to the permitted scheme. These amendments, which relate solely to Blocks A and D and Stapolin Square seek to bring the scheme into closer alignment with LDA objectives.

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 key amendments are summarised as above and are then considered against the Residential Development Standards and wider relevant Development Policies.

6.1.1 ALTERATION OF APARTMENT LAYOUTS AND ADDITIONAL UNITS

As set out above, and summarised in the Architects Design Statement, a review of apartment typologies has taken place to ensure alignment with the LDA typologies. This exercise has resulted in an alteration to the layouts of the permitted A and D Blocks and the addition of 68 no. units within the same building height and massing. This exercise has allowed a minor reduction in overall floorspace, resulting in the blocks narrowing slightly which provides for improved daylight and sunlight levels within the scheme. The A and D Blocks are amended as follows:

- 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.
- 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.
- 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.
- Residential Tenant Amenity Space provided at ground and first floor level of Blocks A3 and D3 is removed and replaced with residential units.
- Façade modifications are proposed to respond to the revised internal layouts including minor relocation of windows, balconies etc.

As set out in the Housing Quality Assessment (HQA) provided by Henry J Lyons Architects, and Section 6.2 of this report, all units meet the requirements of the Planning Design Standards for Apartments: Guidelines for Planning Authorities, 2025.

While the proposed development increases the overall no. of units within the permitted scheme by 68 units, when compared to the scheme as permitted under ABP Reg. Ref. ABP-310418-21 (and as amended LRD/0073/S3E) it results in an overall increase of 11 units. This is in the context of LRD/0015/S3 and LRD/0073/S3E which reduced the overall permitted scheme from 882 no. units to 825 no. units. The proposed amendments now increase this to 893 no. units overall.

6.1.2 ALTERATION OF GROUND FLOOR USES

The ground floor and parts of the first floors of the permitted A and D Blocks has been reorganised to provide for an improved offering. These alterations include:

- Removal of permitted Residential Tenant Amenity Facilities located in Blocks A3 and D3.
- Blocks A1-A3 now contain:
 - 1 no. retail/restaurant/cafe unit of c.224.7 sq.m
 - 1 no. retail/medical unit of c.174.4 sq.m
 - 1 no. gym/retail unit of c.156.4 sq.m
 - 1 no. Childcare Facility of c.702 sq.m including outdoor play space of c.155 sq.m
- Blocks D1-D3 now contain:
 - 1 no. retail/restaurant/cafe unit of c.174 sq.m
 - 1 no. retail/restaurant/cafe unit of c.77.9 sq.m
 - 1 no. retail/restaurant/cafe unit of c.67.7 sq.m
 - 1 no. retail/restaurant/cafe unit of c.100.1 sq.m
 - 1 no. retail/restaurant/cafe unit of c.100.9 sq.m
 - 8 no. ground floor own door access residential units (with 4 additional at first floor level)

The gym/fitness studio is relocated from a permitted location at first floor level below Block D, which is no longer accessible as a result of compliance with Condition 2 (b) of ABP Reg. Ref. ABP-310418-21 / FCC Reg. Ref. SHD/011/20 – GA01, to the ground floor of Block A3. The childcare facility area is increased from a permitted size of 539 sq.m to 724 sq.m.

It is considered that the proposed ground floor uses now provide for a greater flexibility in offering to potential occupiers and responds more appropriately to the revised Stapolin Square design.

It is considered, in the context of wider development being provided by the LDA on the adjacent Clongriffin Lands to the west of the railway tracks, that a level of flexibility should be applied to the uses of the ground floor commercial units. This will ensure that a wide range of uses can be provided to meet the needs of both communities and to ensure the two retail/commercial centres are complementary. In this regard, the ground floor uses have provided for multi uses across each of the units and we would request that FCC, in any grant of permission, include a condition requiring final agreement of the use of the commercial/retail units prior to occupation.

6.1.3 STAPOLIN SQUARE

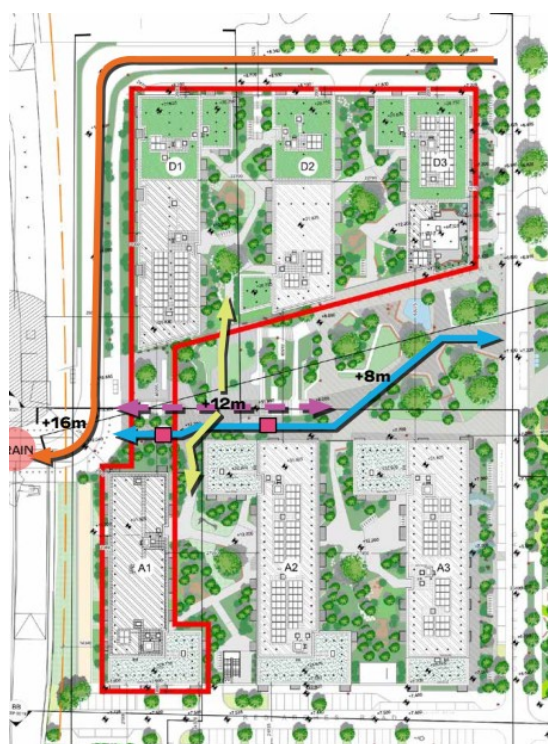


Fig 6.1: Permitted Stapolin Square with lifts

The design and layout of Stapolin Square is 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.

In the permitted scheme, step-free access across the square to the train station was achieved via a level pedestrian route linked by two public lifts, which together overcome the 8-metre level change. In parallel, a stepped route is provided across the square (shown in purple), offering a more direct but non-accessible connection for those who are able to use steps. Around the perimeter of Block D, to the north and west, a pedestrian footpath and a dedicated public transport corridor are provided. This route serves buses, taxis and cyclists and forms an important movement spine, integrating the development into the wider district movement network.

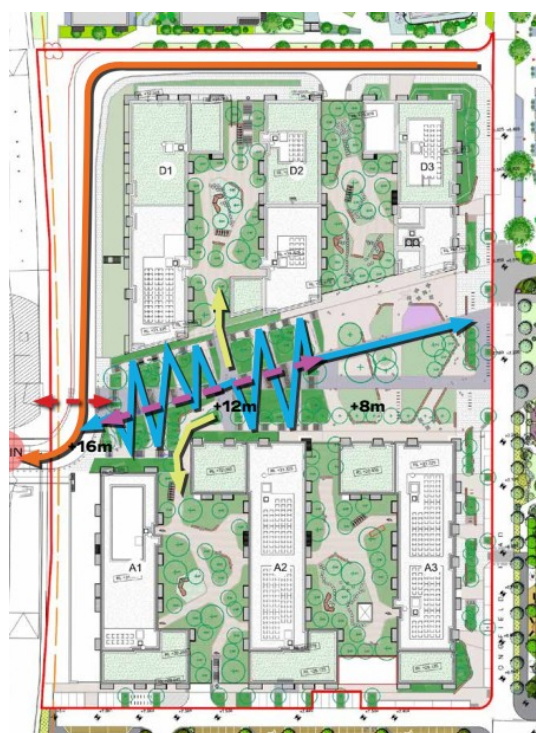


Fig 6.2: Proposed Stapolin Square

In the revised scheme, the strategy for achieving universal access has been amended as per the requirements of Condition 2. The accessible connection across the square to the train station is provided by gently sloping routes with gradients. These routes are designed as part of the public realm rather than as add-on infrastructure, ensuring that universal access is embedded in the overall landscape proposal. A key feature of the proposed gently sloping route is that at the gradient proposed no handrails are required. This allows the form of the access route to appear more natural and seamless in the environment and eliminates the physical and visual barriers that handrails across the scheme would create.

A generous central landing at RL12m is located midway along the slope, acting as both a rest point and a key nodal space. From this landing, access is provided into the private courtyards of Blocks A and D. This configuration is fully compliant with Part M requirements and has been developed to support ease of movement to those with mobility impairments and all other users.

The stepped route across the square, as indicated in purple, is Part M compliant and is retained as a complementary, more direct option for pedestrians. It provides an alternative line of movement and contributes to the spatial definition and activity within the square.

At the uppermost level of Stapolin Square, a crossing point has been incorporated into the road design, allowing pedestrians and cyclists improved safety to cross to the train station.

To the north and west of Block D, the perimeter movement strategy is maintained. A continuous pedestrian footpath, following the road levels is proposed. This route will serve buses and cyclists and completes the connection to Station Road and Clongriffin, ensuring the Stapolin District is integrated into the wider transport network.

Together, these measures deliver a robust, legible and inclusive circulation framework that reinforces Stapolin Square as the focal point of the scheme, while meeting contemporary accessibility standards and future-proofing the development for a wide range of users.

6.1.4 BELOW PODIUM AREAS

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. Condition 2 (b) states:

Car parking spaces R86 to R 124 located beneath the proposed ramped access road to the Train Station Concourse shall be omitted from the undercroft car parking area. Water Tanks for D Blocks shall be repositioned away from beneath the ramped access road.

As set out in the Architects Design Statement Condition 2 (b) requires the removal of 39 spaces, but also impacts access to a further 36 spaces. As such this required a wider reconfiguration of the podium layout.

As such the residential and commercial parking layouts have been amended. There has been an adjustment to the shape of the podium at the northwest side as well as internal layout modifications to improve vehicular circulation, associated building services layouts and adjacencies. Coordination and adjustments of bicycle storage areas and waste storage areas has also been completed.

The total number of internal podium car park spaces is 326. The majority of these spaces (299) are allocated to residential units, maintaining a parking ratio of 0.5 for residential. The remaining 27 spaces are allocated to the proprietors of retail and commercial units and creche staff. 5 car share spaces are proposed within the undercroft. The total number of external surface parking spaces is 42. These are allocated to visitor and retail use. The overall proposed number of spaces is 368.

6.1.5 OVERALL HEIGHT

The parapet heights have been lowered across the scheme by 400mm by the reduction of Level 1 floor to floor height which reduces the overall heights of the permitted scheme while retaining the permitted storey numbers.

At LRD Opinion stage it had been proposed to introduce a centralised heating strategy across the blocks which required additional roof plant on Block A1. It is no longer proposed to include for this heating strategy and as such the proposed roof plant on Block A1 has not been included.

6.2 RESIDENTIAL DEVELOPMENT STANDARDS

The proposed development is fully in compliance with the Fingal County Council Development Plan Standards, as set out in Chapter 14. Since the adoption of the Development Plan the *'Planning Design Standards for Apartments-Guidelines for Planning Authorities, July 2025'* [*"the 2025 Guidelines"*] has replaced the *Sustainable Urban Housing: Design Standards for New Apartments 2020 (or updated guidance as may be in place at the time of lodgement of the planning application)* which are the standards referenced in the Fingal County Development Plan 2023-2029 [*"the Development Plan"*].

The Guidelines state:

'Planning authorities and An Coimisiún Pleanála are required to have regard to the Guidelines and are also required to comply with any specific planning policy requirements (SPPRs) of the Guidelines, within the meaning of Section 28 (1C) of the Planning and Development Act 2000 (as amended) in carrying out their functions under the Act. Accordingly, where SPPRs are stated in this document, they take precedence over any conflicting policies and objectives of statutory plans'

As such the proposed development has been assessed against the new Guidelines which take precedence over the Development Plan. This section of the Planning Report sets out compliance with these standards in tandem with the detail set out in the Housing Quality Assessment. Noting that the current Guidelines are subject to a Judicial Review, although they remain in force, this section also sets out how the proposed scheme is compliant with the Fingal County Development Plan 2023-2029.

Unit Mix

The proposed mix is in compliance with the mix requirements of SPPR 1 of the Guidelines which states:

SPPR1

(A) With the exception of social housing developments, social/affordable housing provided for under Part V the Act or schemes to provide housing for older persons where a specific mix of unit sizes may be required, such as in accordance with a Housing Need and Demand Assessment (HNDA), there shall be no restrictions within statutory plans in relation to the mix of unit sizes or types to be provided within apartment developments. There shall be no minimum or maximum requirements for apartments with a certain number of bedrooms.

(B) Where any such restriction or requirement is set out within a statutory plan, this Specific Planning Policy Requirement shall apply to any single apartment scheme and there shall be no restriction in relation to the mix of unit sizes or types and there shall be no minimum requirements for apartments with a certain number of bedrooms within the development, except in the circumstances set out above.

The existing permitted mix for the A and D Blocks is as follows:

PERMITTED (A and D ONLY)

Unit Mix		No.	%
	Studio	38	7.2
	1 Bed	122	23.1
	2 Bed- 3P	21	4.0
	2 Bed- 4P	293	55.5
	3 beds	54	10.2
	Total	528	100.0

The proposed development includes the following mix, for Blocks A and D only:

PROPOSED (A & D ONLY)

		No.	%
Unit Mix	Studio	0	0.0
	1 Bed	305	51.2
	2 Bed- 3P	46	7.7
	2 Bed- 4P	235	39.4
	3 beds	10	1.7
	Total	596	100.0

When taken into account with the wider permitted scheme the overall mix is as amended follows:

PERMITTED (OVERALL GA1 SHD- APARMENTS ONLY)

		No.	%
Unit Mix	Studio	38	5.5
	1 Bed	193	27.9
	2 Bed- 3P	47	6.8
	2 Bed- 4P	359	51.9
	3 beds	55	7.9
	Total	692	100.0

PROPOSED (OVERALL GA1 SHD- APARMENTS ONLY)

		No.	%
Unit Mix	Studio	0	0.0
	1 Bed	376	49.5
	2 Bed- 3P	72	9.5
	2 Bed- 4P	301	39.6
	3 beds	11	1.4
	Total	760	100.0

As the current 2025 Guidelines specify that there shall be no restrictions in respect of unit mix, the proposed amendments are considered compliant.

Section 14.7 of the Fingal Development Plan references SPPR1 from the Sustainable Urban Housing: Design Standards for New Apartments 2020 (as updated), which related to unit mix however no standards are specified. As the proposed amendments are compliant with the previous SPPR1, the proposed development is considered in compliance with the Development Plan.

Floor Areas

The proposed floor areas are in compliance with the requirements of SPPR 2 of the Guidelines which states:

SPPR2

The following minimum apartment floor areas shall apply and statutory plans shall not specify minimum floor areas that exceed the minimum floor areas set out below:

- Studio apartment (1 person) 32sq.m
- 1-bedroom apartment (2 persons) 45 sq.m
- 2 bedroom apartment (3 persons) 63 sq.m
- 2-bedroom apartment (4 persons) 73 sq.m
- 3-bedroom apartment (4 persons) 76 sq. m
- 3-bedroom apartment (5 persons) 90 sq.m

The floor area parameters set out above shall generally apply to apartment schemes and do not apply to purpose-built and managed student housing.

The proposed residential units meet or exceed the minimum standards for apartment sizes as set out in the 2025 Guidelines. Compliance with minimum aggregate floor areas and widths for living/dining/kitchen rooms and bedrooms is outlined in the HQA as prepared by the Henry J Lyons Architects and accompanies the application.

The 2025 Guidelines go on to set out that:

*In the interests of delivering sustainable and good quality urban development, these Guidelines should be applied in a way that ensures a good mix of apartment sizes. **Accordingly, at least 25% of units within a development shall exceed the minimum sizes set out in SPPR2 by 10%**, with the potential for more than 25% of units to exceed the sizes set out in SPPR2 to be provided as required on a scheme-by-scheme basis in apartment schemes in more suburban locations, social housing developments, social and affordable housing delivered under Part V and schemes to provide housing for older persons and/or persons with disabilities.*

Section 14.7.1 of the Fingal Development Plan references the previous SPPR3 from the Sustainable Urban Housing: Design Standards for New Apartments which related to Unit Sizes. The sizes listed are consistent with or greater than the 2025 Guidelines, noting the absence of a standard for a 3-bed (4 person), which is a new introduction but of which there are no unit types proposed in this application. As such the proposed development is considered in compliance with the Development Plan.

Aspect

The 2025 Guidelines require that a minimum of 25% of the overall number of units in a scheme should be dual aspect:

SPPR3

In relation to the minimum number of dual aspect apartments that may be provided in any single apartment scheme, the following shall apply:

- (i) A minimum of 25% of units within a development shall be required to be dual aspect. Statutory plans shall not specify minimum requirements that exceed the requirements of this Specific Planning Policy Requirement.
- (ii) For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise further discretion to consider dual aspect unit provision at a level lower than the 25% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects.

They further state:

Where single aspect apartments are provided, the number of south facing units should be maximised, with west or east facing single aspect units also being acceptable. Living spaces in apartments should provide for direct sunlight for some part of the day. North facing single aspect apartments may be considered, where overlooking a significant amenity such as a public park, communal space or some other amenity feature (subject to environmental considerations such the impact of lighting on natural habitats). Particular care is needed where windows are located on lower floors that may be overshadowed by adjoining buildings.

The proposed development includes for c. 27.2% in Block A and 33% in Block D of dual aspect units, in compliance with the 2025 Guidelines standards. When considered as part of the wider permitted development the overall dual aspect is c. 37%.

Section 14.7.4 of the Fingal Development Plan references the previous SPPR4 from the Sustainable Urban Housing: Design Standards for New Apartments which related to Dual Aspect. The previous Guidelines identified that there should be *‘a minimum of 33% dual aspect units required in more ‘central and accessible urban locations’, where it is necessary to achieve a quality design in response to the subject site characteristics and to ensure good street frontage’*. This was the standard considered by An Coimisiún Pleanála in their assessment of the permitted scheme. As such the overall development is c.37% dual aspect and there it is considered compliant with the Development Plan.

Floor to Ceiling Heights

The proposed heights are in compliance with the requirements of SPPR 4 of the 2025 Guidelines which states:

SPPR4

Ground level apartment floor to ceiling heights shall be a minimum of 2.7m. For building refurbishment schemes on sites of any size or urban infill schemes on sites of up to 0.25ha, planning authorities may exercise discretion on a case-by case basis, subject to overall design quality.

The 2025 Guidelines identify that 2.4m is standard good practice however 2.7m would be a minimum standard for ground floor apartments, but a higher ground floor should be considered where apartments are not proposed at ground level.

The proposed scheme while reducing ground floor heights has retained increased heights required at ground floor level, where commercial units are provided and ground floor own-door residential. Detailed daylight assessment has been carried out on the proposed development by OCSC and is outlined in greater detail in their accompanying report.

Section 14.7.2 of the Development Plan references the previous SPPR5 from the Sustainable Urban Housing: Design Standards for New Apartments which related to Floor to Ceiling Heights. The Development Plan states that *‘In line with SPPR 5 of the Apartment Guidelines, ground level apartment floor to ceiling heights shall be a minimum of 2.7m and shall be increased in certain circumstances, particularly where necessary to facilitate a future change of use to a commercial use. 3.0m should be considered in such instances’*. As the proposed amendments continues to meet these requirements then it is considered compliant with the Development Plan.

Lift and Stair Cores

The proposed scheme is in compliance with the requirements of SPPR 5 of the 2025 Guidelines which states:

SPPR5

There shall be no requirement within statutory plans or within an individual scheme in respect of a minimum number of units per floor per core.

The proposed amendments have sought to minimise the number of cores and maximise the number of apartments with no block having more than 11 units per core.

Section 14.7.5 of the Fingal Development Plan references the previous SPPR6 from the Sustainable Urban Housing: Design Standards for New Apartments 2023 which related to units per core. The previous Guidelines identified that *a maximum of 12 apartments per floor per core be provided in apartment schemes*. As no block has more than 11 units per core then it is considered compliant with the Development Plan.

Internal Storage

Section 3.7 of the 2025 Guidelines refers to Appendix 1 which sets out minimum storage requirements as follows:

- Studio 3 sq.m
- 1-bed 3 sq.m.
- 2-bed (3P) 5 sq.m.
- 2-bed 6 sq.m.
- 3-bed (4P) 6 sq.m.
- 3-bed (5P) 9 sq.m.

All units in the scheme meet or exceed the requirements. Compliance is set out in the HQA as submitted.

Section 14.7.3 of the Development Plan states that internal storage within an apartment unit shall be provided in accordance with the Sustainable Urban Housing Design Standards for New Apartments as set out in Appendix 1 and Section 3.30 to 3.34 of the previous Guidelines.

As the 2025 Guidelines are consistent with the previous Guidelines then the scheme is considered compliant with the Fingal Development Plan.

Private Amenity Space

Section 3.8 of the 2025 Guidelines refers to Appendix 1 which sets out minimum private open space requirements as follows:

- Studio 4 sq.m
- 1-bed 5 sq.m.
- 2-bed (3P) 6 sq.m.
- 2-bed (4P) 7 sq.m.
- 3-bed (4P) 7 sq.m.
- 3-bed (5P) 9 sq.m.

The Guidelines identify that *'private amenity space shall be provided in the form of gardens or patios/terraces for ground floor apartments and balconies or terraces at upper levels. Where provided at ground level, private amenity space shall incorporate boundary treatment appropriate to ensure privacy and security'*.

Private amenity space has been provided on all units, and in all cases meets or exceeds the minimum standards for private open space. This is set out in the accompanying HQA prepared by Henry J Lyons.

Section 14.7.6 of the Development Plan states that private open space shall be provided in accordance with the Sustainable Urban Housing Design Standards for New Apartments as set out in Appendix 1 and Section 3 of the Apartment Guidelines.

As the 2025 Guidelines are consistent with the previous Guidelines then the scheme is considered compliant with the Development Plan.

Communal Amenity Space

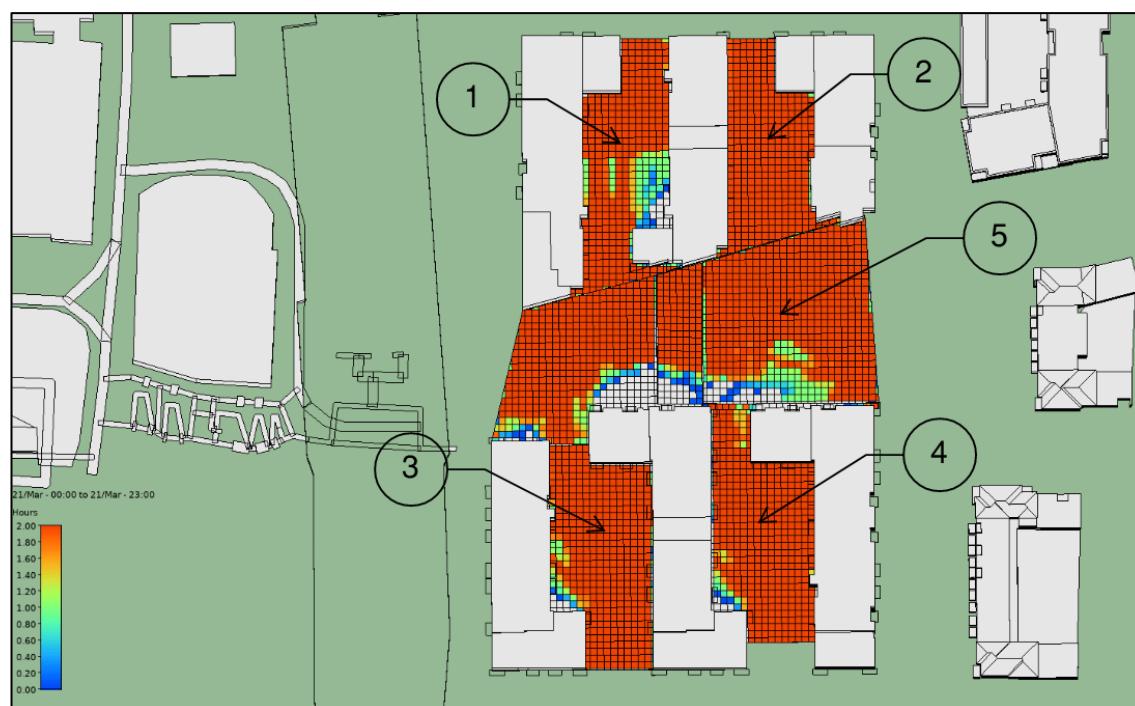
Section 4.3 of the 2025 Guidelines refers to Appendix 1 which sets out communal amenity space requirements as follows:

- Studio 4 sq.m
- 1-bed 5 sq.m.
- 2-bed (3P) 6 sq.m.
- 2-bed (4P) 7 sq.m.
- 3-bed (4P) 7 sq.m.
- 3-bed (5P) 9 sq.m.

Section 14.7.7 of the Development Plan requires that communal amenity space must be provided within a scheme for the resident's use.

As set out in the Architects Design Statement the communal amenity space will be increased as a result of the narrowing of the residential blocks. The previously permitted communal space for the A Blocks was 3,035 sq.m this is now proposed at 3,715 sq.m The previously permitted communal space for the D Blocks was 2,322 sq.m this is now proposed at 2,622 sq.m.

As set out in the Daylight, Sunlight & Overshadowing Assessment prepared by OCSC, all of the podium courtyards receive the required 2 hours of sunlight for over 50% of the spaces. As per the below it is clear these podium amenity spaces are receiving high levels of sunlight.



Unit Ref.	Amenity Type	Area (m ²)	Area receiving over 2 hours of sunlight (m ²)	Portion of Amenity Space receiving ≥ 2 hours Sunlight on 21 st March (%)
1	Private	1566.57	1291.57	82.45%
2	Private	1357.82	1312.82	96.69%
3	Private	1750.42	1460.42	83.43%
4	Private	1707.91	1547.91	90.63%
5	Public	4932.89	4152.89	84.19%
Total		11315.61	9765.61	86.30%

Fig 6.3: Sunlight in Open Space Assessment (Source: OCSC)

6.3 HEIGHT

As set out in the Architect's Design Statement, the permitted massing i.e. storey height for each block is not proposed to be changed in this amendment application. The proposed amendments are primarily contained internally to each of the blocks, with no additional floors of accommodation proposed.

The only proposed change in permitted heights is that the parapet heights have been lowered across the scheme by 400mm by the reduction of Level 1 floor to floor height.

6.4 DENSITY

The density strategy for the permitted development was as set out under the now expired LAP. Figure 4D.1 of the LAP set out the preferred density of lands within the now expired Local Area Plan (LAP) and which sought a higher density in Area C, around Clongriffin Train Station of 50-80+ uph.

The amendments proposed in this application will have the effect of increasing the overall unit numbers in the permitted development (overall GA1) to 893 no. units from 825 no. units (increase of 68 no. units) and therefore results in a marginal increase in density from 93 uph (as permitted) to 100 uph.

As FCC will be aware when the GA1 permission was granted by ACP, the overall unit numbers were 882, and as such a density of 99 uph was permitted. The GA1 permission was subsequently amended to reduce heights on the A and D blocks which reduced the density from 99 uph (as permitted) to 93 uph. The proposed amendments which now provides for additional units will bring the density levels back up to the as original as permitted levels for the scheme.

6.5 PUBLIC OPEN SPACE- STAPOLIN SQUARE

There is no change to the public open space quantum or location as permitted under the SHD application. The only proposed change is to the layout and design of Stapolin Square which is a requirement of Condition 2 (a) of ABP-310418-21 which states:

The two Public Lifts located within the Village Square (Stapolin Square) shall be omitted and an alternative means of access for all, such as ramps shall be provided.

The detail of the proposed amendment is set out in Section 6.1.3 above as well as in the Architects Design Statement and Landscape Design Report.

The delivery of Stapolin Square as the focal point of the scheme, in terms of public open space, remains the strategy as per the permitted scheme. The inclusion of the entirety of Stapolin Square as part of the Public Open Space remains the proposed strategy.

6.6 ACCESS, CAR & CYCLE PARKING

The development site sits in Zone 1 in accordance with FCC Development Plan 2023-2029. The maximum car parking standards given in the FCC Development Plan 2023-2029 for residential/ apartment units, retail and creche elements has been accessed for the proposed development.

It is also noted that the previously permitted development under FCC Reg. Ref. SHD/011/20 was granted under the FCC Development Plan 2017–2023, under which different car parking standards applied.

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 removal of car parking under the permitted ramped access road to the Train Station to the north of Block D. Condition 2 (b) states:

Car parking spaces R86 to R 124 located beneath the proposed ramped access road to the Train Station Concourse shall be omitted from the undercroft car parking area. Water Tanks for D Blocks shall be repositioned away from beneath the ramped access road.

As set out in the Architects Design Statement Condition 2 (b) requires the removal of 39 spaces, but also impacts access to a further 36 spaces. As such a wider reconfiguration of the podium layout is required and proposed as part of this application.

This application therefore includes proposed amendments to the residential and commercial parking. There has been an adjustment to the shape of the podium at the northwest side as well as internal layout modifications to improve vehicular circulation, associated building services layouts and adjacencies. Coordination and adjustments of bicycle storage areas and waste storage areas have also been completed.

The total number of internal podium car park spaces is 326. The majority of these spaces (299) are allocated to residential units, maintaining a parking ratio of 0.5 for residential. The remaining 27 spaces are allocated to the proprietors of retail and commercial units and creche staff. 5 car share spaces are proposed within the undercroft. The total number of external surface parking spaces is 42. These are allocated to visitor and retail use. The overall proposed number of spaces to 368.

The Traffic & Transport Assessment prepared by CS Consulting sets out the parking and access strategy in detail and concludes that the proposed development can be supported by the existing road infrastructure, that the parking provision for the proposed development confirms to the relevant standards, and that the development access design and internal layout are fit for purpose and comply with the *Design Manual for Urban Roads and Streets*.

With regards to cycle parking, a provision of 1 bicycle parking space per bedroom and 1 visitor bicycle parking space for every 4 no. units is provided in the proposed development. This exceeds the standards as set out in the Fingal County Development Plan and substantially meets the requirements of the Sustainable Urban Housing Guidelines, previously referenced, with the exception of visitor parking which proposes an initial provision of 1 space per 4 no. units, with the remainder being provided on a phased approach. The Transport & Traffic Assessment (Section 6.5) prepared by Cronin Sutton provides details and a justification for the level of cycle parking proposed.

6.7 SUNLIGHT AND DAYLIGHT

The overall configuration and design of the proposed development has been influenced by the need to achieve the best possible levels of sunlight and daylight penetration into the development and minimising any impact from the proposed amendments on the existing permitted development. Detailed Daylight and Sunlight assessment has been carried out on the proposed development by OCSC and is outlined in greater detail in their accompanying Report and summarised below.

- **Internal Daylight:** The analysis confirms that the majority of spaces not only meet but greatly exceed the recommendations outlined within the Third Edition (2022) methodology, 97.52% for criterion 1 and 95.05% for Criterion 2 of all the spaces assessed of the proposed amended development has been achieved.

Throughout the development, comfortable and desirable spaces have been designed to enhance the opportunity for improved daylight levels and extensive glazing to every room enabling deep daylight penetration and providing enhanced views to landscaped open spaces.

- **Sunlight to amenity spaces:** In relation to amenity space sunlight, the overall amenity space in the development show compliance with BRE Guide 3rd Edition recommendations, with more than 50% of the total amenity space receiving more than 2 hours of sunlight on March 21st test day.
- **Overshadowing:** The changes in the overshadowing images demonstrates that there is a negligible impact on the surrounding properties when assessed on the 21st March test day.
- **Impact to neighbouring (permitted) blocks:** The Vertical Sky Component (VSC) assessment has been carried out for all windows within the surrounding permitted properties. The results show that the majority of neighbouring windows achieve VSC values above the 27% BRE target; however, due to the positioning of the proposed amended development, some windows experience a reduction and fall below this threshold.

In accordance with BRE guidance, a comparison with the previously permitted scheme demonstrates that the amended proposal represents an improvement, with VSC values remaining equal to or exceeding those previously approved. Accordingly, the amended development would not result in any worsening of daylight conditions and confirms that no significant adverse impacts are anticipated.

Furthermore, a detailed internal daylight assessment has been carried out for selected worst-case rooms within the adjacent permitted properties. This analysis confirms that adequate daylight levels would continue to be achieved with the proposed amended development in place, and no significant adverse impact on internal daylight conditions is anticipated.

Based on the above summary along with detailed material provided in the report body and accompanying appendices, it is the opinion of the applicant that the proposed amendments to this permitted scheme is (a) is aligned with policy in regard to natural light and (b) has given appropriate and reasonable consideration to maximising natural light during the design process.

6.8 CHILDCARE FACILITIES

The permitted SHD Application included for a creche of c.539 sqm with an external play area of c.123 sq.m. The permitted SHD application was amended to reduce the height of the A and D Blocks which reduced the overall number of units and with no subsequent amendment to the size of the permitted creche.

This application now seeks to increase the number of overall units resulting in 10 units additional to what was originally permitted. The number of units considered to be served by the creche has reduced on the basis of the change in overall unit mix from 734 no. 2,3 & 4 beds to 616 no. 2,3 & 4 beds (houses and apartments).

As the proposed development only relates to part of the permitted development however the childcare requirements are based upon the entire permitted scheme, as the creche provided in Block A is for the entire scheme. This includes the housing units already built under F16A/0412, ABP Reg. Ref. ABP-248970 as amended.

The proposed development results in an overall 992 no. units for the entirety of the GA1 lands as amended. This includes the constructed units under F16A/0412, ABP Reg. Ref. ABP-248970 and the subsequent permitted SHD, ABP Reg. Ref. ABP-310418-21 (and as amended under LRD/0016/S3 & LRD/0073/S3E), which is the subject of this amendment.

The proposed creche is provided on the basis of a requirement of c.165 spaces for a total of 616 units (total number of units less one-bed units, as set out further below). The 616 units includes the 2-Bed & 3-Bed apartment units, totalling 461 units, in addition to the existing constructed and permitted houses, totalling 232 units (2, 3, 4 bed units).

The proposed amendments to unit mix reduces the childcare requirements of the scheme while at the same time it is proposed to significantly increases the size of the creche to c.702 sq.m. As such it is considered that the minor increase in units compared to the originally permitted numbers plus the significant increase in the size of the creche more than provides for childcare places required for the development and will have a positive impact on childcare availability locally.

In the LRD Opinion received, FCC have queried the delivery of the temporary creche as identified under the parent permission. As set out in the LRD Opinion, The LDA has engaged with FCC in respect of the location of the temporary

childcare facility, as set out under Condition 4.4 of Planning Reg. Ref. F16A/0412 and ACP Ref: PL06F.248970, which is to be provided, as a temporary provision while the permanent childcare facility, to be located on the ground floor of Block A2-A3, is being constructed. This is a temporary creche which will serve the short term needs of the development while the permanent crèche located in Block A is constructed.

This is set out in the accompanying Childcare Demand Report prepared by Brady Shipman Martin.

7. PART V – SOCIAL HOUSING

The permitted development identified that Part V was to be met across the various blocks. As a result of the reduction in units, as amended by LRD/0015/S3 & LRD/0073/S3E, this reduced the Part V requirement similarly. The proposed increase units under this application will equally increase the Part V requirement. The Part V units are identified and proposed to be incorporated into Blocks C2a and D3. Engagement on this has taken place between the Land Development Agency and Fingal County Council Housing Department and a letter from FCC is included as part of the application pack.

8. ENVIRONMENTAL CONSIDERATIONS

8.1 BIRDS AND HABITATS DIRECTIVE – APPROPRIATE ASSESSMENT

An Appropriate Assessment Screening Report and Natura Impact Statement has been prepared by Altamar and is submitted as part of this LRD Application. The report concludes that *“no significant effects are likely on Natura 2000 sites, their features of interest or conservation objectives. The proposed project will not adversely affect the integrity of European Sites”*. Please refer to the Appropriate Assessment Screening and Natura Impact Statement prepared by Altamar for further details.

8.2 EIA DIRECTIVE

As an amendment application to an existing permission, the proposed development is considered for the requirement for EIA under ‘Class 13 Changes, extensions, development and testing’, of Part 2 of Schedule 5 of PDR 2001, which states:

13. Changes, extensions, development and testing

(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.

It is noted that the proposed amendment results in an increase in permitted residential units (from 825 no. units to 893 no. units) on the same area permitted for development (under FCC Reg. Ref. SHD/011/20 & ABP Reg. Ref. 310418).

Under consideration for Class 13, the proposed development results in no change in size (of development area) and does not meet or exceed an amount equal to 50% of the appropriate thresholds. The appropriate thresholds being either 50% of 500 dwellings – 250 no. units (i.e. under Class 10(b)(i)) or 50% of 10 hectares – 5 hectares ((i.e. under Class 10(b)(iv)).

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.*

The Review of Requirement for Environmental Impact Assessment Note prepared by Brady Shipman Martin (included in Appendix 1) concludes that *“the proposed development would not be likely to have significant effects on the environment.”*

9. CONCLUSION

The statement and report set out herein demonstrates the consistency of the proposed amendments to the permitted development at Baldoyle/Stapolin.

At a national and regional level, this report and accompanying submission documentation has demonstrated the consistency of the proposed development with National and Local Planning Guidelines and Policy as outlined in this report. Consistency with the policies and provisions of the Fingal County Development Plan 2023-2029 which is the key planning policy document at a local level, is also demonstrated within this report.

It is respectfully submitted that the proposed amendments will provide for a more optimised and viable permission enabling the commencement of Phase 2 of this significant residential development by the Land Development Agency. Additionally, the amendments give effect to Condition 2 of the SHD permission and the changes required which allows the permission to commence.

In conclusion, it is respectfully submitted that the proposed amended 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 we welcome a positive decision from Fingal County Council to enable the continuation of delivery of this strategic site.

