

DOWNEY

29 Merrion Square, D02RW64

**STATEMENT OF RESPONSE TO AN BORD
PLEANÁLA
PRE-APPLICATION CONSULTATION OPINION**

**Proposed Strategic Housing Development
Lands at Belcamp Hall (Protected Structure),
Malahide Road, Dublin 17**

Applicant: Gerard Gannon Properties

May 2022

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1.0 INTRODUCTION

This **Statement of Response**, prepared by Downey, 29 Merrion Square, D02RW64, accompanies a planning application to An Bord Pleanála for a proposed strategic housing development on lands at Belcamp Hall (Protected Structure), Malahide Road, Dublin 17.

Following consultation with Fingal County Council & Dublin City Council under Section 247 of the Planning and Development Act, 2000 (as amended), a request to enter into pre-application consultation with An Bord Pleanála was submitted on 5th October 2021, with An Bord Pleanála subsequently accepting the Section 5 pre-application consultation request in November 2021. The pre-application consultation meeting was then held remotely via Microsoft Teams on 24th November 2021. This meeting included representatives from An Bord Pleanála, Fingal County Council, the applicant and their design team. On 14th January 2022, An Bord Pleanála issued the notice of pre-application consultation opinion for the proposed development, under case reference ABP-311570-21.

Having regard to the above, the opinion states that An Bord Pleanála *“is of the opinion that the documents submitted with the request to enter into consultations require further consideration and amendment to constitute a reasonable basis for an application for strategic housing development”* and notes 3 no. items to be submitted with any application.

The opinion further states that, *“in addition to the requirements as specified in articles 297 and 298 of the Planning and Development (Strategic Housing Development) Regulations 2017, the following specific information should be submitted with any application for permission”*, and notes 10 no. items to be submitted with the application pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017.

The statement now sets out a response to An Bord Pleanála’s pre-application consultation opinion. This statement of response should be read in conjunction with all drawings and documentation submitted as part of this Strategic Housing Development application.

2.0 ITEMS FOR FURTHER CONSIDERATION & AMENDMENT

2.1 Item No. 1 – Principle of the Development

ABP Opinion

“Further consideration and/or justification of the documents as they relate to Objective Balgriffin/Belcamp 6 of Fingal County Development Plan 2017-2023. The submitted documentation should address the higher-level planning policy, including inter alia, the need for a Local Area Plan for the site. The consideration/ justification of documentation should cross reference the appropriate development and phasing strategy necessary to comply with national guidance for sustainable residential development and self-sufficient communities. In addition, any references to delivery of the development at this location and the circumstances of the surrounding area,

including those relating to the availability or otherwise of infrastructure, employment, retail, commercial or social services, should be based on verifiable facts.”

Applicant’s Response

Need for a Local Area Plan (LAP)

In the first instance it is important to note that this planning application is unique in that it is for a development across the administrative boundaries of two different Local Authorities (Dublin City Council (DCC) and Fingal County Council (FCC)). In this regard, the application must take into account both the Fingal County Development Plan 2017-2023 (FCDP) and the Dublin City Development Plan 2016-2022 (DCDP) as well as the Clongriffin-Belmayne Local Area Plan (LAP) 2012-2018 (extended until December 2022) (noting that these are the statutory plans in effect at this time as the Draft Plans have not been adopted to date¹). Therefore, the LAP designation only applies to the Fingal County Council element of the subject lands as the Dublin City Council lands are not subject to an LAP. In this regard, the applicant and design team have taken a holistic approach to the design of the scheme to ensure that a fully coordinated and sustainable residential community can be developed that is best suited to the lands and surrounding area and receiving environment.

Notwithstanding the above, full consideration has been given to *Objective Balgriffin/Belcamp 6* of the Fingal County Development Plan 2017-2023, which states:

Prepare a Local Area Plan for lands at Belcamp (see Map Sheet 9, LAP 9.B) to provide for a sustainable mixed use urban district including residential, community and recreational facilities subject to the delivery of the necessary infrastructure and rehabilitation and restoration of Belcamp House.

From the outset of the pre-planning process, Downey Planning and the applicant have engaged with Fingal County Council to determine if a Local Area Plan for the Belcamp lands within the Fingal administrative area was to have been prepared. We were informed by FCC that no LAP was to be prepared during the lifetime of the current Plan as a new Fingal County Development Plan was being prepared and is due to be adopted and come into effect in Spring 2023.

It is considered that due to the nature of the lands, which has a single landowner, that the proposed development on the Fingal administrative part of the lands is appropriate in the absence of an adopted LAP by Fingal County Council (i.e. LAP 9.B of the current Fingal County Development Plan 2017-2023) given the detailed level of assessment under the SHD process and the ongoing consultation with the Planning Authorities since planning permission was first granted on Belcamp Hall for the applicant in 2005. Gerard Gannon Properties are the only landholder of the area identified as *LAP 9.B* within the Fingal Development Plan. In relation to the parent permission on the site, which represents Phase 1 of the Belcamp lands (Reg. Ref F15A/0609 (ABP Ref. PL06F.248052)) for the phased delivery of 263 no. residential units and the restoration of Belcamp Hall; works & subsequent applications by way of

¹ These are the statutory development plans in force at the time of submission of this application. While both plans are set to be replaced by new development plans in 2022 (Dublin City Council) and 2023 (Fingal County Council) and a draft development plan has been published in respect of Dublin City Council (Draft Dublin City Development Plan 2022 to 2028) and Fingal County Council (Draft Fingal County Development Plan 2023-2029), these draft plans are not yet in force.

Condition No. 2 attached to ABP Ref. PL06F.248052, have been made in consultation with the Planning Authority and all relevant bodies. It is important to highlight that the parent permission was for an initial phase of development, closest to the Malahide Road part of the lands. This current proposed application, now before the Board, represents additional lands that were not part of the parent permission and as such is a stand-alone planning application.

This proposed application also offers the opportunity for a phased delivery of strategic infrastructure, residential, community, recreational and commercial facilities over a 10-year period in consultation with relevant bodies and the Planning Authorities. In this regard, the development will comprise of the following mix of land uses within the Fingal administrative area:

- Residential units – in the form of houses, duplex units and apartments.
- Community uses – including childcare facilities, communal open space, a site reserved for a future school (subject to requirement by the Department of Education), communal rooms, town square.
- Recreational uses – including playing pitches, landscaped open space comprising urban squares, biodiversity loops, woodlands and riverside walks.

Downey's also wish to bring to the attention of the Board that the phasing strategy for the proposed development has been carefully considered by the applicant and design team, in consultation with the Planning Authorities and other prescribed bodies, such as the National Transport Authority (NTA) and Irish Water. In this regard, the phasing plan proposes that all of the required infrastructure shall be provided in the first phase of the development, and this is outlined in detailed within Waterman Moylan's Engineering Assessment Report, which is submitted under separate cover as part of the application. The proposed development is not reliant on any future infrastructural upgrades by others in order for the development to be implemented.

Belcamp SHD Phasing Programme	Start	Finish	Quantum of Development
Infrastructure (Main Roads)	Q1/2023	Q1/2025	0
SHD Phase 1	Q1/2023	Q3/2028	1,504 no. units 4,190 sq.m. GFA retail/commercial
SHD Phase 2	Q/2028	Q3/2030	630 no. units
SHD Phase 3	Q3/2030	Q4/2032	393 no. units

Table 1 – Belcamp SHD Construction Phasing Programme

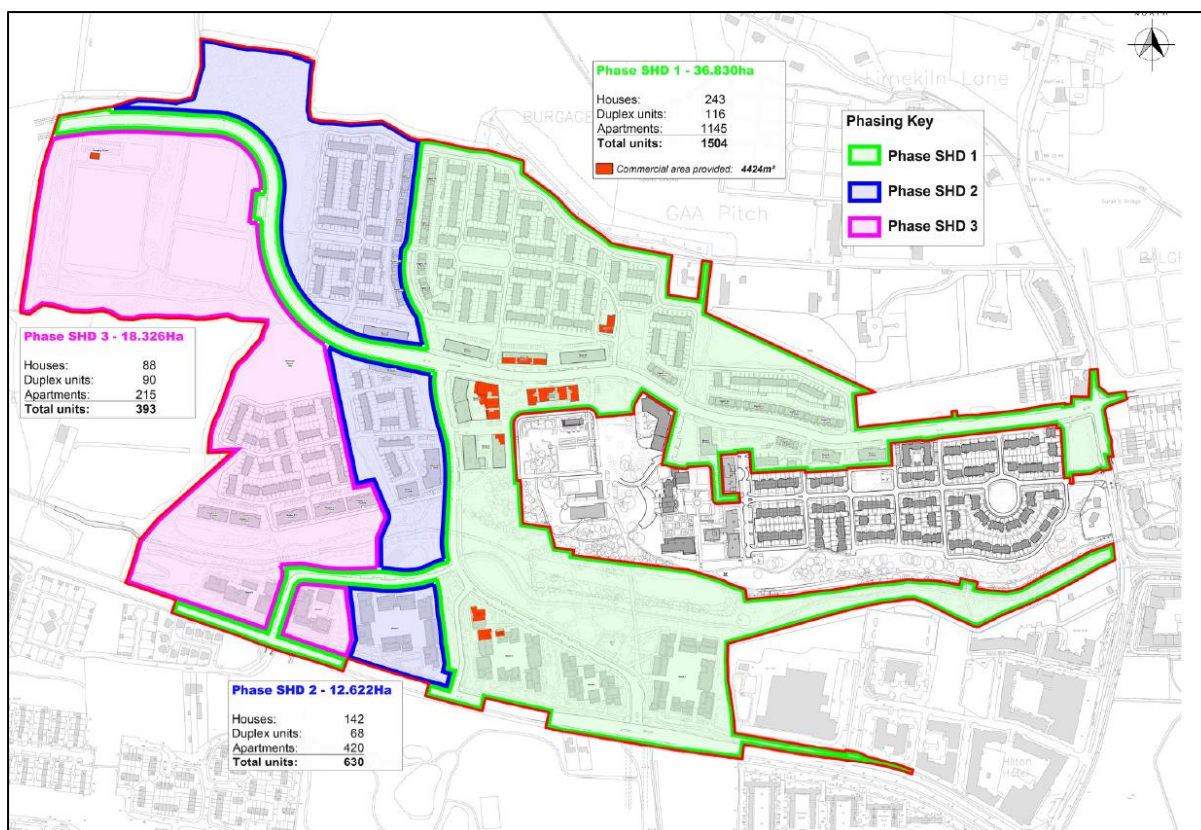


Figure 1 – Belcamp SHD Construction Phasing Programme

It is respectfully submitted that the phasing of the development is consistent with Section 5.8 of the Sustainable Development in Urban Areas, Planning Guidelines, which states that “*the phasing of proposed major residential development in tandem with new public transport infrastructure/services (as in the case of the Adamstown Strategic Development Zone) should be considered*”. In this regard it is submitted that the proposed phasing programme for Belcamp SHD will deliver all of the main infrastructure within in the initial construction phase with the housing and retail/commercial development following in phases 1-3. Therefore, the development is being phased such that it does not rely on future public transport provision or other infrastructure upgrades that are beyond the control of the applicant. This is also consistent with section 2.4 of the Urban Development and Building Height Guidelines for Planning Authorities, which support increased density and height of development within the footprint of developing sustainable mobility corridors and networks in order to optimise investment in infrastructure.

The nature of the lands allows for consistency throughout the area identified as *LAP 9.B*, offering a unique opportunity for strategic residential development within appropriately zoned and serviced lands. Downey respectfully put forward to the Board that the SHD process is the best method of procurement, given the high-level assessment that is required for the application, to bridge the gap between the Dublin City Council and Fingal County Councils lands.

It is important to note that an LAP has not been prepared to date and the preparation of such would take a number of years. This is ultimately impeding development on *Tier 1: Serviced Zoned Land* as identified in the National Planning Framework. The overall quantum of development on the Belcamp lands and the applicant’s intension to develop the lands had been in discussion between the applicant

and the Planning Authorities for several years. The lands have been appropriately zoned for almost 20 years and it is not reasonable to delay further due to the absence of an LAP.

The *Development Management Guidelines for Planning Authorities (2007)* at paragraph 7.16.1 state that development, which is premature because of a commitment in a development plan to prepare a strategy, Local Area Plan or framework plan not yet completed, should only be used as a reason for refusal if there is a realistic prospect of the strategy or plan being completed within a specific stated time frame. It is respectfully submitted that there is no specified time frame for the Local Area Plan to be completed and as such permission for this proposed development should not be refused.

Having regard to the advice given in the Development Management Guidelines for Planning Authorities and the absence of a demonstrable commitment by the Planning Authority to commence work on the local area plan, it is submitted to the Board that permission should be granted for the subject application noting that the lands are zoned for residential development and that the proposals comply with the objectives for a local area plan for the lands as set out in LAP 9.B of the current FCDP 2017-2023. It is submitted that it would be inappropriate to refuse permission for the proposed development on the grounds that the development is premature pending the preparation and adoption of a local area plan by the Council noting that the lands are in the sole control and ownership of the applicant and is not reliant upon third party landowners. Furthermore, the proposed development has been sensitively designed in a manner that does not prejudice the development of the surrounding lands or indeed does not prejudice the preparation of a local area plan by the Council.

The Board are also invited to refer to the Material Contravention Statement and the Planning Statement, which further discuss the higher-level planning policy and the need for a LAP for the FCC part of the lands.

Pattern of Development

A Sequential analysis and mapping of the wider Belmayne/Clongriffin LAP area has been prepared by Downey as part of this response. The Board are invited to refer to the graphic and index below (Fig. 1 & Table 1). There are only 6 suitably zoned & available sites for residential development within the Belmayne/Clongriffin LAP area. As shown, development along this northern city fringe has taken place from Clongriffin Station, where there are now limited available lands for development. Areas of south-west Belmayne & Belcamp Lane hold a higher proportion of available lands and Development Phasing Area 5 (DCC Lands & Belmayne Parcel) has been identified as a Masterplan Area. Additionally, the proposed development seeks to develop Phasing Area 6. This locality ultimately represents the next land bank to be developed.

It must be noted the delivery of this subject SHD will be phased over a 10-year period and the proposed development is consistent with the national guidance for sustainable residential development and self-sufficient communities, such as the National Planning Framework, Urban Development and Building Height Guidelines for Planning Authorities and Sustainable Residential Development Guidelines for Planning Authorities (please refer to the Statement of Consistency with Planning Policy, prepared by Downey Planning that is submitted under separate cover). Therefore, the proposed development and timeframe of delivery provides further evidence that it will not leapfrog other lands for development but rather be based on a sequential approach to the release and development of

land. Downey respectfully submits to the Board that the pattern of the development within the Clongriffin & Belmayne area is in accordance with the phasing strategy set out in section 16.2 of the LAP and that the Belcamp Lands are as such the next landbank to be developed.



Furthermore, the lands are situated in the Fingal/Dublin City Fringe area and lands to the west of the proposed development are zoned as a Technological Employment Zone. As well as providing a large quantum of high-quality housing, it brings amenity, ecologic, infrastructural, and commercial value. The proposed SHD is phased over a ten-year period, which is being intentionally planned for the future development of the area. Furthermore, these lands are of Regional strategic importance as the lands potentially link the proposed section of the EWLR and Stockhole Lane, which in the future could improve access to Dublin Airport from Fingal/ Dublin Fringe areas. The Board are invited to refer to the Traffic and Transport Assessment prepared by Waterman Moylans, which addresses the proposed development in relation to the requirements of the South Fingal Transport Study and the delivery of the East West Link Road.


















Figure 2: Sequential Land Analysis of Clongriffin/Belmayne Lands

From a review of Figure 2 and Table 2, it is evident that:

- Development has taken place from Clongriffin Station in a westerly direction.
- The Clongriffin-Belmayne LAP 2012-2018 (as extended) represents a total approximate area of 2.15 square kilometres. The available lands available for development represent a total area of just 0.195799 square kilometre – Therefore, just 9% of the overall LAP area is available for development.
- South-west Belmayne and Belcamp Lane have been identified as a Masterplan Area - this location represents the next land bank to be developed

Map Index	
Lodged Applications	
1 - Parkside 5B, Parkside, Dublin 13 (ABP-312003-21) 730 no. residential units	
2 - Lands identified within the Clongriffin – Belmayne LAP which forms part of the subject application	
Approved Applications	
3 - Site at Belmayne P4, The corner of Churchwell Road and Churchwell Crescent, Belmayne, Dublin 13 (ABP-310077-21)	
4 - Site 2, Mayne River Avenue, Northern Cross, Malahide Road, Dublin 17 (ABP-307887-20)	
5 - GA3 Lands at Baldoyle (adjacent lands formerly known as the Coast), Baldoyle, Dublin 13 (SHD/016/21). 1,221 no. residential apartment/duplex dwellings	
6 - GA3 Lands at Baldoyle (adjacent lands formerly known as the Coast), Baldoyle, Dublin 13. (SHD/011/20)	
7 -Lands at Clongriffin, Dublin 13, on plots known as 6,11,17,25,26,27,28 and 29, located to north, south and east of Marrsfield Avenue and to north, south, east and west of Marrsfield Crescent (plots25,26 and 27), to south of Beltree Av (ABP-305316-19).	
8 - Lands at Clongriffin, Dublin 13 on plots known as 3, 13 and 15, located to the south of Park Street, east of Friars' Street and north of Main Street (plot 3) to the north of Market Street, south of Dargam Sreet, east of Lake Street and west of Clongriffin. 407 no. apartment units (3894/19)	
9 - The development will comprise of 209 guest bedrooms, hotel bar/restaurant/front of house reception areas, main and secondary function rooms and meeting rooms, kitchen/service/ancillary facilities, fitness suite, service and plant areas, 20 apartments (with balconies) for short term letting for holiday and business use, (4 x 3 bed, 8 x 2 bed, 4 x 2 bed+study, 4 x 1 bed), 2569/17	
10 – A development comprised of the construction of a part three storey, part two storey post primary school in Belmayne - Roll Number 68346T - including PE Hall, 4 classroom Special Education Needs Unit and all ancillary site works. (Reg. Ref 2600/20)	
11 – Belcamp Hall parent application F15A/0609	
Services/amenity/community	

Grange Community College	
Draft Master Plan Area - Belmayne and Belcamp Lane Masterplan	
Lands Zoned Green Belt	
Amenity, green and recreational space	
Draft Belmayne & Belcamp Lane Masterplan Area	
Available Sites	
<p>Site bound by Myrtle Rd to the north and Grange Road to the south (Total area 7,151 sqm). Site not identified within the LAP lands.</p> <p style="text-align: center;"></p>	
<p>Site Bound by Grange Community College to the south and Main Street to the north (Total area 28,164 sqm)</p> <p style="text-align: center;"></p>	
<p>Site adjacent Beltree Park and bound by Clongriffin Main St to the south (Total Area 16,116 sqm)</p> <p style="text-align: center;"></p>	
<p>Site bound by Father Collins Park to the west and Park Row to the south and east (Total area 4,074 sqm)</p> <p style="text-align: center;"></p>	
<p>Lands bound by R139 to the south and R107 to the west (Total area including Belmayne Allotments 85, 638 sqm). These lands are within area identified as part of the Draft Belmayne and Belcamp Lane Masterplan</p> <p style="text-align: center;"></p>	





<p>Lands bound by Co-operatibe Housing Dublin North to the north and Malahide Road to the south east. (46,190 sqm). These lands are within area indentified as part of the Draft Belmayne and Belcamp Lane Masterplan.</p> <p style="text-align: center;"></p>	
<p>Lands bound by Co Operative Housing Dublin North to the east and R139 to the north (15,617 sqm). These lands are within area indentified as part of the Draft Belmayne and Belcamp Lane Masterplan.</p> <p style="text-align: center;"></p>	

Table 2: Map Index

Infrastructure

It is important to clarify that all of the proposed hard infrastructure, including roads, drainage, utilities etc., that are necessary for the overall development, are to be provided for within Phase 1 of this SHD, as outlined in Waterman Moylan's Engineering Assessment Report and outlined earlier in this response. This includes the East-West Link Road and its connection to the R139 to the south. This ensures that the provision of appropriate bus services through the lands can be implemented. The development also proposes a range of sustainable modes of transport, such as bike-sharing services, cargo-bikes and Go Car as well as similar services, in order to create and maximise the provision of sustainable transport. This is supported by the Sustainable Transport Strategy report, which has been prepared by Systra and submitted under separate cover.

Furthermore, Downey, respectfully submit to the Board that the phased delivery of the proposed development will ensure it provides the appropriate commercial and social infrastructure for residents and a Community and Social Infrastructure Audit as well as a Childcare Demand Assessment and School Demand Assessment reports have been prepared by Downey's and are submitted under separate cover as part of this application. Moreover, the overarching goal for the development is to create a self-sustaining community. Provision of lands for a school has been made as part of the development. A range of retail and commercial floorspace is also being proposed, which has been informed by a Retail Impact Assessment as well as a report prepared by Cushman and Wakefield who have confirmed that the quantum of retail and commercial floorspace is appropriate for the proposed development. The future populations of these lands have been fully considered within the current proposal & all the necessary infrastructure will be supplied to support a self-sustaining community.

In relation to the capacity of existing infrastructure, all relevant assessments have been undertaken as part of the application; including all necessary ecological & environment assessments, an economic & retail study, engineering and traffic & transport assessments. It must also be noted that the

applicant received a Confirmation of Feasibility letter from Irish Water, which has been included as part of this application.

Restoration of Belcamp Hall

Belcamp Hall has been devastated by two arson attacks, the second of which took place in 2020, which disrupted and set back months of restoration works. This fire destroyed the historic fabric of Belcamp Hall leaving only some elements of the original elements of the internal fabric and materials. Despite this disruption, efforts have continued to restore Belcamp Hall, which has been in close consultation with the Planning and Conservation Officers of Fingal County Council. Details on the progress of Belcamp Hall include:

- A Proposed Procedure of Works on Belcamp House was written by Sheehan & Barry, Architectural Conservation Specialists, in June 2021 and agreed in principle with the Planning Authority.
- Increased security of the building and site has been provided, including security fencing, CCTV and mobile security patrols.
- Works to the roof ongoing including new roof trusses, which have recently been inserted.
- Scaffolding is in place in the Chapel for its restoration.
- Conservation Architect David Averill of Sheehan & Barry Architects has been in contact with the National Museum on behalf of the applicant to arrange independent assessment and discuss the storage arrangement of Harry Clarke-stained glass windows.
- Monthly meetings have continued between the conservation team and the Planning Authority.

Conservation works have continued with Declarations Under Section 5 having been submitted to Fingal County Council and deemed to be exempt development regarding the following:

- **Reg. Ref FS5/032/21** – By order dated 1st July 2021, Declaration Under Section 5 in regard, a. Reinstatement of structural floor elements. b. Re-instatement of structural roof elements.
- **Reg. Ref FS5/023/21** –By order dated 27th May 2021, Declaration Under Section 5 in regard, a. Recovery and analysis of building debris. B. Removal of building fabric remains. C. Re-instatement of Belcamp House south elevation. D. Reinstatement of chapel roof.

The Chief Executive's Report (page 13) under Reg. Ref. F21A/0401 stated that:

"A number of Section 5 declarations have been submitted to the Planning Authority relating to works to the protected structure. As part of this application, the applicant has submitted a timeline for the survey, tendering and construction of the agreed Section 5 works. These works will not fully reinstate/restore the historic house and chapel but are an important stage in achieving this. However, to date no works have commenced on the protected structures"

We note that since that report was written, works have commenced and are ongoing to the protected structure, which is evident of the intention of the applicant to continue and complete the overall restoration works.

Further to this, we shall outline below a summary of further works that have taken place on Belcamp Hall or are about to commence. This summary clearly shows that the opinion of the Planning Authority is not up to date with works on the ground, which have continued at the time of their assessment of the application.

- Additional perimeter fencing complete and erected for security purposes.
- Structural strengthening works to the Southwest corner of house is now complete.
- Internal scaffold to the Chapel is now complete.
- Preparation works for the roof trusses is ongoing.
- The trusses are currently being manufactured and are due for delivery in January 2022.
- External lighting and CCTV will be installed around the site before Christmas 2021.
- At a site meeting with the Local Authority, it was agreed that a Section 247 Pre-planning meeting for amendments to the original planning permission, which are required as a result of the significant fire damaged since permission was first granted is to be submitted prior to year-end 2021.
- Monthly meetings are taking place with the conservation team and the Planning Authority.

Furthermore, given the history of vandalism and arson attacks at this site; it is within the security interests of the restoration project that development and occupation of dwellings continues to ensure passive surveillance, activity and continued safeguarding of Belcamp Hall.

In light of the foregoing, it is evident that ongoing restoration works are taking place at Belcamp Hall, and which is being carried out in close consultation between the applicant and its design team and Fingal County Council.

2.2 Item No. 2 – Design Strategy

ABP Opinion

“Further consideration and/or justification of the documents as they relate to the design approach of the proposed development and the need for a high quality, strong urban edge which integrates effectively along the R139. The further consideration/justification should address the proposed design and layout, inter alia the unit mix proposed across the entire site, the design of the ground floor apartments units, passive surveillance and functionality of open space (in particular along the River Mayne), compliance with DMURS guidance and interaction with lands currently permitted within the applicant’s ownership. Particular regard should be had to the 12 criteria set out in the Urban Design Manual which accompanies the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (May 2009) and the requirement for good design and the inclusion of a sense of place.”

Applicant's Response

Prior to responding to Item No. 2 and demonstrating the rationale behind the design of the proposed scheme, it is noted that an Urban Design and Architectural Statement has been prepared by CCK Architects and Wilson Architects, which is submitted under separate covers. This provides the design approach utilised within the proposed scheme with respect to the 12 criteria set out in the Urban Design Manual, DMURS, and Development Management Standards of the current Dublin City Development Plan, which we invite the Board to refer to. For further details regarding the open space provision within the scheme, please also refer to the enclosed drawings and report prepared by Ronan McDiarmada Landscape Architects as well as TBS Landscape Architecture.

High quality, strong urban edge which integrates effectively along the R139

A high-quality urban edge to the R139 leading into the new town centre, is the key feature of Character Areas 5 & 6 of the proposed development with the creation of new local link roads connecting from the R139 northwards to the east west link road. This urban portal off the R139 opens into an expansive view of the demesne woods giving a strong sense of place and entry into this new neighbourhood. This area is within a five-minute walk of the proposed transport interchange and town centre close to Clarehall/Northern Cross.

The design of the edge with the R139 has been amended from the Pre-Application Consultation stage and, while previously the design team had sought to retain the existing hedgerow (which are not original townland boundaries but rather a more modern intervention), it is now proposed to remove part of this hedge in order to bring the proposed buildings closer to the R139 and create a stronger urban edge.

The apartment buildings are arranged so the scale tapers from north to south with a robust urban edge to the R139 availing of southern exposure and distant views, and with lower buildings to the valley park admitting light and adjusting to the scale of the development behind. Overall, the development and the urban edge along the R139 integrate effectively through elements which show case the historic context while introducing a new urban building-scape designed to with taller north-south building with strong urban rhythm while low buildings allow light into courtyards and the valley park.

Tall north-south building gives a strong rhythm, while lower building in-between allow light into courtyards and the valley park.



Figure 3: Urban edge along R139 and the valley park (Source: Wilson Architecture)

Further consideration/ justification should address the proposed design and layout, inter alia the unit mix proposed across the entire site, the design of the ground floor apartments units, passive surveillance and functionality of open space (in particular along the River Mayne).

Unit Mix

The unit mix has been proposed cognisant of the Apartment Guidelines (2020) and relevant policies and objectives, such as compact growth in areas with high transport capacity as well as increased supply of 1-bed & 2-Bed units as well as the introduction of 3-bed units to the Dublin City Council part of the scheme in order to meet the broad needs of the housing market in line with the goals of Housing for All. There is a mix of apartment, duplex units and houses proposed, ranging from one to four bedrooms. The rationale is to provide suitable housing for all tenures and life stages. It should be possible to transition through various typologies and tenures, and still remain within your community. The unit mix for the proposed development is as follows:

Table 3: Unit Mix within the DCC Administrative Area

	Unit Mix				
	Studio	1-Bed	2-Bed	3-Bed	4-Bed
No. of Units	0	387	697	146	0
Unit Mix (%)	0%	31.5%	56.7%	11.9%	0%

Total	1,230 Apartments
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Table 4: Unit Mix for Apartments within the FCC Administrative Area

	Unit Mix				
	Studio	1-Bed	2-Bed	3-Bed	4-Bed
No. of Units	0	237	292	199	0
Unit Mix (%)	0%	32.6%	40.1%	27.3%	0%
Total	728 Apartments				

Table 5: Overall Apartment Mix for Development

	Unit Mix				
	Studio	1-Bed	2-Bed	3-Bed	4-Bed
No. of Units	0	624	989	345	0
Unit Mix (%)	0%	31.9%	50.5%	17.6%	0%
Total	1,958 Apartments				

Table 6: Unit Mix for Houses within the FCC Administrative Area

	Unit Mix				
	Studio	1-Bed	2-Bed	3-Bed	4-Bed
No. of Units	0	0	16	385	72
Unit Mix (%)	0%	0%	3.38%	81.4%	15.22%

Total	473 Houses
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Throughout the site, building typologies have been influenced by their setting with Belcamp Hall, existing development as well as context with proposed infrastructure. On arrival from the R139, the road user is first met with a new urban edge this then opens to the park and the rich natural setting of Belcamp Hall and the walled garden, providing instant identity and legibility to the scheme. Dwelling typologies are arranged to provide higher density and enclosure in particular places. The southern edge to the R139 demands buildings of a type and scale that will not be dominated by the road – therefore apartments. The apartments also tend to be clustered around the civic hubs where proximity of facilities is an advantage, particularly for older people. The main through routes also require enclosure and sufficient heights to reinforce the spatial and route hierarchy within the scheme. In this case duplex buildings and apartments of similar scale are mainly employed. This typology can accommodate the lack of frontage access for parking and yet is granular enough to mesh with housing behind. Housing is generally located behind the stronger edges of the principal routes. Family housing is clustered close to the school and the main public open spaces. The least dense areas are furthest from the primary transport hub, but all dwellings are within 500m of the central bus spine through the site.

Heights are arranged to reflect the spatial and movement hierarchy of the scheme. A robust frontage is required to the south where the scheme makes an edge to the R139, a busy arterial route into the north - east city from the M50 and M1. Buildings here range up to 9 floors with a 6-storey shoulder on the east-west building and taller blocks on a north-south buildings, so facilitating both sunlight and rhythm. The main through routes within the development are edged with 4 and 5 storey buildings providing good enclosure and rising to 5-storeys in the centre around the civic space with associated retail and commercial facilities.

Ground Floor Units

We note that at the Pre-Application Consultation Stage, Dublin City Council raised some concern with regard to the level of privacy that can be achieved for ground floor residential units and their patio/terraces where they will interface with the public realm. Further to this, Wilson Architects revisited the design of Blocks 1-6 within the Dublin City Council administrative part of the site (i.e., southern portion of the Belcamp SHD lands). As a result, the majority of ground floor units are now own door duplexes with private amenity space provided at first floor level, facing onto the Podium amenity areas where possible. Opaque glazing to the rear of the vertical railing will be included for units located in close proximity to entrance zones and other general circulation areas.

Passive Surveillance

Passive surveillance design interventions have been used in a number of locations throughout the scheme namely at the Mayne River Valley Park, the proposed town square, car parking locations, commercial sites and along road elements. Apartment blocks line each side of the Mayne River Valley Park giving good containment and passive surveillance. The squares/urban plazas are to be surrounded by buildings which will overlook both the square and the walled garden and provide passive surveillance. The East West Link Road (EWLR) has a tree lined boulevard with strong enclosure

and passive surveillance. These are discussed in more detail within the Landscape reports prepared by The Big Space and RMDA, which are submitted under separate cover. For full detail on the proposed unit mix, height, passive surveillance design interventions and the proposed urban edge along the R139 the board are invited to refer to the Urban Design Statement prepared by CCK Architects and Wilson Architects.

2.3 Item 3: Traffic and Transport

ABP Opinion:

“Further consideration and/or justification of the documents as they relate to the traffic and transport provision. The submitted documentation should address the requirements of the South Fingal Transport Study and the delivery of the East West Link Road. Regard should be given, in the Traffic and Transport Assessment, inter alia, the capacity of the surrounding junctions and the impact of the proposed development on the surrounding road network and the delivery of sustainable transportation options.”

Waterman Moylan Consulting Engineers have written a detailed response to this in Section 2.3 of their report ‘Response to Engineering Items Raised in An Bord Pleanála, Fingal County Council and Dublin City Council Pre- Application Consultation Opinion Reports’, which is submitted under separate cover as part of this application. The Board are invited to refer to that report for a full response to this item. We note however, that the provision of the proposed East West Link Road is being provided in full as part of Phase 1 of this SHD. For the convenience of the Board, we have also copied their information below.

A detailed review of the requirements of the South Fingal Transportation Study (SFTS) and the delivery of the East West Link Road (EWLR) is provided in Section 5.2 and 5.4.1 of the accompanying Engineering Assessment Report, prepared by Waterman Moylan Consulting Engineers.

The main transport routes proposed through the subject site, as envisioned in the SFTS, are shown in the Figure below. This strategy is in accordance with the DCC and FCC Development Plans.

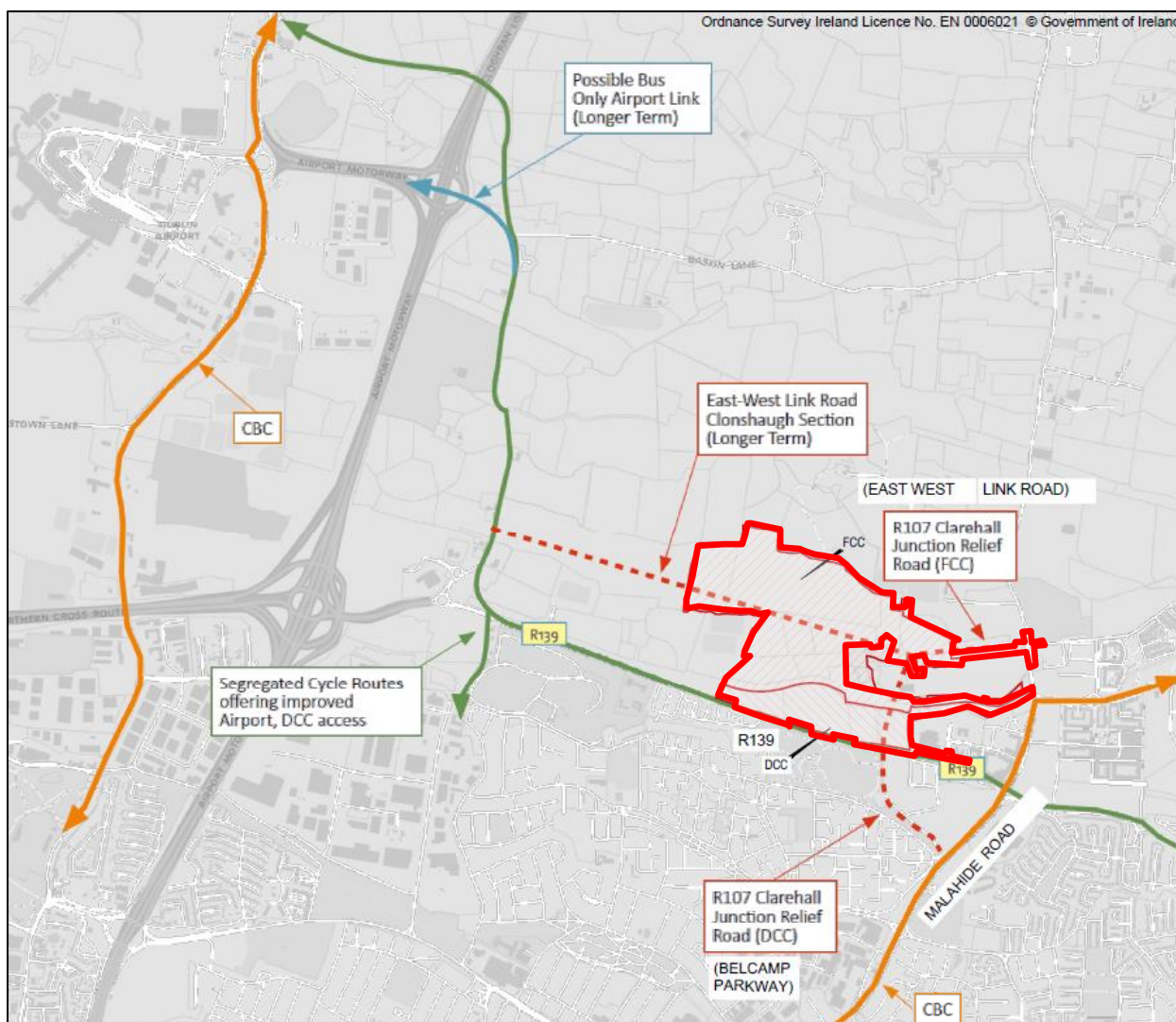


Figure 4: South Fingal Transportation Strategy

The South Fingal Transportation Study report has informed the Belcamp Design and the development of the transport strategy and infrastructure:

SFTS Recommendation 21: Clare Hall Junction Relief Road (Belcamp Parkway)

The Clare Hall Junction Relief Road, referred to in this submission as Belcamp Parkway, is described by the SFTS as a proposed relief road connecting from the Malahide Road to the EWLR, and forming a new junction with the R139. This connection is in accordance with both the DCC and FCC development plans.

Belcamp Parkway, as set out in the SFTS, crosses the Mayne River west of Belcamp Hall. It is proposed under the subject application for the Relief Road to connect with the EWLR in the vicinity of Belcamp Town Square.

SFTS Recommendation 22: Malahide Road/Balgriffin Road Junction Upgrade

The SFTS recommends that the Malahide Road/Balgriffin Road junction should be upgraded with signals and turning lanes, while also providing a safe and attractive environment for pedestrians and cyclists. This upgrade has been given a decision to grant permission by Fingal

County Council under Phase 1B of the Belcamp development works (F21A-0401), along with approximately 350m of the EWLR. Nonetheless, this subject application also includes the proposed junction upgrade works, along with the approved ~350m of the EWLR, to ensure this application can provide the entirety of the link road from the Malahide Road to the site.

The junction is proposed to be upgraded to form a new 4-way signalised junction, with the EWLR forming the western arm of the new junction. The proposed junction includes new right-turning lanes and cycle facilities. The upgrade works will extend south on the Malahide Road to connect with the upgrades currently being carried out as part of the Phase 1 development.

SFTS Recommendation 23: East-West Link Road

The SFTS recommends that the EWLR be designed based on DMURS principles, placing an emphasis on public transport and active modes of transport. This would indicate that the road should be envisaged as part of the development rather than as a boundary at the edge of the development.

Accordingly, the road's proposed route is through the development, with connections/links to the north and to the south.

The SFTS envisages the EWLR as the main bus route providing east-west linkages to the fringe area and ultimately to the airport environs. Waterman Moylan met with representatives from the NTA, FCC and DCC in March 2022 to discuss the transport requirements of the proposed Belcamp SHD development. The current N8 BusConnects route departs from Clongriffin train station, continuing along Main Street before turning south onto the Hole in the Wall Road and then continuing west along the R139. At the meeting, the NTA advised that they require the N8 BusConnects Route to be altered to run through the subject development along the East-West Link Road (EWLR) into Belcamp Town Square and then, preferably, directly south onto the R139. The EWLR road is therefore designed to comply with the principles of a Core Bus Corridor and to accommodate optimum cyclist and pedestrian facilities.

The proposed development includes more than half of the orbital bus service route linking Malahide Road to Stockhole Lane, as described in the SFTS, to link the employment zoned lands north of the R139 with Dublin Airport and Swords. The remainder of the route to Stockhole Lane is within lands under the ownership of the IDA, who we understand are actively considering development of these lands.

The Applicant has liaised with the IDA, who have requested connectivity via the Belcamp Lands and who have made a submission to DCC on the draft Belcamp/Belmayne Masterplan in 2020. This subject application will not only be providing the EWLR into the employment zoned lands but will also be providing excellent pedestrian/cycle facilities along the R139 and River Mayne, which will link the IDA lands directly to Belcamp and Belmayne Town Square.

For ***assessment on the capacity of the surrounding junctions and the impact of the proposed development on the surrounding road network*** refer to Section 8 of the Traffic and Transport Assessment.

It is noted that there are certain junctions in the vicinity of the site experiencing congestion at certain times of the day; in particular, the Clarehall junction between R107 and R139. The proposed development will provide additional road and active travel infrastructure which will mitigate the traffic

impact of the development on these junctions, and in fact traffic modelling suggests that the introduction of the East-West Link Road and Belcamp Parkway will help to relieve congestion in the area – refer to the accompanying Traffic and Transport Assessment report for additional information on the traffic modelling. The EWLK is envisaged as a core bus route, providing east–west linkages to the fringe area and ultimately to the airport environs. Accordingly, this road is designed to comply with the principles of a Core Bus Corridor and to accommodate optimum cyclist and pedestrian facilities. The NTA have confirmed that the N8 bus route will utilise this new infrastructure, continuing south via a new bus gate. This alternative route would avoid the congested Clarehall junction between R107 and R139, improving the efficiency of the bus network.

Although there are currently no proposals to bring one of the D routes through the Belcamp development, BusConnects routes are subject to future change depending on demand and future development. Emphasis has therefore been placed on providing a robust design that can facilitate various future bus routes through the site, and as such Belcamp Parkway and the R139 Link Road have been designed as bus capable roads that can accommodate bus routes and bus stops. Both roads are designed with signalised junctions onto the R139 that can provide bus priority if required.

The introduction of high-quality pedestrian and cycling infrastructure, including upgrades along the R139 and the Malahide Road, along with the introduction of Core Bus Corridors and bus-priority junctions, will provide significant opportunity for a modal shift to active travel and public transport in the area.

For an assessment of **the delivery of sustainable transport options** refer to accompanying Travel Plan and accompanying Public Transport Capacity Assessment of Belcamp Site prepared by Derry O'Leary, Transport Consultant.

3.0 SPECIFIC FURTHER INFORMATION

3.1 Item No. 1 – Additional Computer-Generated Images (CGIs) and visualisation/cross sections

ABP Opinion

“Additional Computer-Generated Images (CGIs) and visualisation/cross section drawings showing the proposed development in the context of the existing residential and commercial properties surrounding the site and the proposed development at key landmark views.”

Applicant's Response

A full assessment of the proposed development's context within existing residential & commercial properties as well as the Protected Structures & key landmarks has been undertaken as part of the application. The Board are invited to refer to the Verified View & Photomontage booklet and CGI's, prepared by Digital Dimensions, as well as the Design Statement prepared by CCK Architects and

Wilson Architects for a detailed analysis of the proposed development setting in relation to existing developments and landmarks.

3.2 Item No. 2 – The proposed materials and finishes to the scheme.

ABP Opinion

“A report that specifically addresses the proposed materials and finishes to the scheme including specific detailing of finishes, the treatment of balconies in the apartment buildings, landscaped areas, pathways, entrances, boundary treatment/s and neighbourhood/commercial centre.”

Applicant’s Response

A Building Lifecycle Report and a Materials & Finishes Report have been prepared by CCK Architects and Wilson Architects and are submitted under a separate cover in support of this application. The landscape reports, prepared by The Big Space and RMDA also address materials and finishes and the Board are invited to refer to these for further details. High regard has been given to the proposed development’s finishes in order to create a distinctive character and successful response to existing developments & the built heritage within the site. All selected materials are of high-quality, low maintenance and durable, the variety of which adds interest to the development. Brick finishings are common throughout the proposed development which responds well to the existing residential development and complements the historical features with the site i.e., the Walled Garden and Belcamp Hall.

CCK Architects and Wilson Architects have proposed a variety in terms of the palette of materials chosen for the apartment blocks and balconies, including brick, cladding, glass, and some render. The palette of materials is durable and robust ensuring that they will not deteriorate over time and thus will maintain the integrity and design quality of the scheme. As well as choosing different materials, CCK Architects and Wilson Architects have also designed subtle features such as the choice of colour of brick-and-mortar composition and the likes of soldier courses so as to increase the variety of the design and add to the architectural interest of the scheme. This also helps to break down the perceived massing of the buildings and creates different character areas in the scheme.

Please refer to the Materials & Finishes Report, sections, and elevation drawings prepared by CCK Architects and Wilson Architects for further details on finishing and materials. Furthermore, the Board are invited to refer to Building Lifecycle Report for details on the long-term management and maintenance of the proposed development in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2020). Moreover, the Landscape Design Statement prepared by TBS Landscape contains full details on landscaped areas, pathways, entrances, boundary treatments and neighbourhood & commercial centre.

3.3 Item No. 3 – Conservation Impact Assessment

ABP Opinion

“An updated Conservation Impact Assessment which includes justification for the design and layout, having regard to the location adjacent to Belcamp House, and include a phasing and delivery schedule detailed the restoration works for Belcamp House”.

Applicant’s Response

As part of this application an Architectural Conservation Impact Assessment Statement has been prepared by Sheehan + Barry Conservation Architects. This document includes an Architectural Heritage Impact Assessment which assesses the proposed development’s setting within the historic landscape, which concludes that:

In summary, the proposed SHD development accords with established strategy for restoring and consolidating the historic buildings and landscape as the core asset within the overall development.

Please refer to the relevant Conservation reports and drawings prepared by Sheehan + Barry Conservation Architects for full details having regard the proposed development’s location adjacent to Belcamp House as well as the phasing & delivery schedule of restoration works for Belcamp House.

3.4 Item No. 4 – Retail Impact Assessment

ABP Opinion

“A Retail Impact Assessment, clearly demonstrating that the quantum of retail and commercial service proposed is sufficient to serve the proposed population within the site”.

Applicant’s Response

An Economic & Retail Study has been prepared by Downey which demonstrates that the quantum of retail and commercial service proposed is sufficient to serve the proposed population within the site. The proposed retail development provides for a total floor area of 4,424 sqm, comprising of a total of 2,332 sqm retail and/or commercial uses and café/restaurant across the scheme along with childcare facilities and changing facilities for the playing pitches. This is achieved with respect to the two elements of, (1) serviceability, and (2) accessibility, i.e., meeting the flux of population arising from the proposed scheme considering the hierarchy of retail provision within the Retail Planning Guidelines for Planning Authorities 2012, and establishing a walkable development.

Additionally, the Economic & Retail Study contains a full assessment of the broader catchment area (Balgriffin, Priorswood A, Priorswood B, Priorswood C, Grange A, Grange B, Baldoyle, and Portmarnock South ED’s) in terms of estimating its overall available expenditure for retail and commercial uses up to 2025 which is defined as the timeframe of the assessment.

It is Downey's professional planning opinion that there is a quantifiable need for additional convenience and/or comparison floorspace, such as that proposed as part of the development. Please refer the Economic & Retail Study undertaken as part of this application for full details on these assessment and findings. Cushman and Wakefield have also prepared an assessment of the proposed development, which is also submitted under separate cover, and which confirms that the range and scale of retail within the proposed development is appropriate having regard to the market demands and existing provision in the surrounding area.

3.5 Item No. 5 – Taking in charge map

ABP Opinion

"A Taking in charge map".

Applicant's Response

A Taking in charge map has been prepared as part of CCK Architects drawing pack for the Fingal County Council element of the lands, please refer to Drawing No. 2008 PA1 1053 for details.

A Taking in charge map has also been prepared as part of Wilson Architects drawing pack for the Dublin City Council element of the lands, please refer to Drawing No. 1535-PL-0-120 for details.

3.6 Item No. 6 – Report addressing the contents of the submission from Irish water (dated 8th of November 2021)

ABP Opinion

"A report that addresses the contents of the submission from Irish Water (dated 8th of November 2021) concerning the need to ensure no impact on the proposed future wastewater treatment plant adjacent to the proposed development. In addition, the report shall address the concerns raised in relation to the need for a detailed Local Network Plan (Master Plan) of the Development Area, including water distribution and wastewater collection networks servicing the planned building blocks".

Applicant's Response

Waterman Moylan's have prepared a separate response to the Board's opinion in relation to the submission from Irish Water (dated 8th of November 2021). The Statement of Response as well as relevant engineering documentation prepared by Waterman Moylan's address the concerns raised in relation to the need for a detailed Local Network Plan (Master Plan) of the Development Area, including water distribution and wastewater collection networks servicing the planned building blocks. Please refer to the documentation prepared by Waterman Moylan, which has been submitted as part of this application.

3.7 Item 7: A detailed Landscape Plan and relevant Tree Survey.

ABP Opinion

“A detailed landscaping plan clearly illustrating the quantum and functionality of all areas designated for communal and public open space. The landscaping details shall include, inter alia, designated communal open space, the inclusion of useable space for play provision necessary to comply with Section 4.13 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities and the design, a detailed trees survey and proposed tree planting scheme and shall clearly indicate the quantum and designated areas of useable public open space”.

Applicant’s Response

A Detail Landscape Plan has been prepared by TBS Landscape Architects for the element of the SHD application within the administrative area of Fingal County Council and also by RMDA Landscape Architects for the element of the SHD application within the administrative area of Dublin City Council and these are submitted as part of this application. The Landscape Plan includes information on the designated communal open space, the quantum of public space and provision of play areas & equipment necessary to comply with Section 4.13 of the Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities. Furthermore, the Tree File have prepared an Arboricultural Report and drawings, including a detailed tree survey and tree planting scheme. The Board are invited to refer to these reports for full details.

3.8 Item 8: A detailed breakdown of public and communal open space areas

ABP Opinion

“A quantitative and qualitative assessment which provides a breakdown of the public and communal open space areas. This assessment should include a detailed landscape plan including the provision of communal amenity spaces and play facilities in line with the Sustainable Urban Housing: Design Standards for New Apartments (2020) and the requirements of Fingal County Council Parks Department”.

Applicant’s Response

In response to this request, the Board are invited to refer to the Public Realm Strategy Report and associated Landscape Plans, which are submitted under separate cover having been prepared by The Big Space Landscape Architects. A similar submission has also been prepared by RMDA Landscape Architects for the element of the SHD application that is located within the administrative area of Dublin City Council. The Board are invited to refer to these for further details.

3.9 Item No. 9 – Sunlight/Daylight/Overshadowing analysis

ABP Opinion

“An updated Sunlight/Daylight/Overshadowing analysis showing an acceptable level of residential amenity for future occupiers and existing residents, which includes details on the standards achieved within the proposed residential units, in private and shared open space, and in public areas within the development and in adjacent properties. This report should address the full extent of requirements of BRE209/BS2011, as applicable”.

Applicant’s Response

A full Sunlight/Daylight/Overshadowing analysis addressing the full extent of requirements of BRE209/BS2011 throughout the proposed development has been prepared by Waterman Moylan (who are focussed on the Fingal County Council administrative lands) and also DKP International (who are focussed on the Dublin City Council administrative lands) and are submitted under separate cover as part of this application. The proposed development has been found within these reports to fully comply with the required standards.

3.10 Item No. 10 – Statement of Consistency with Planning Policy

ABP Opinion

“In accordance with section 5(5)(b) of the Act of 2016, as amended, any application made on foot of this opinion should be accompanied by a statement that in the prospective applicant’s opinion the proposal is consistent with the relevant objectives of the development plan for the area. Such statement should have regard to the development plan or local area plan in place or, likely to be in place, at the date of the decision of the Board in respect of any application for permission under section 4 of the Act”.

Applicant’s Response

In response to this, a Statement of Consistency with Planning Policy, prepared by Downey Planning, is submitted under separate cover as part of the planning application, and outlines that the development complies with the relevant policies and objectives of the Dublin City Development Plan 2016-2022, the Clongriffin-Belmayne Local Area Plan 2012-2018 (as extended) and the Fingal County Development Plan 2017-2023 as they relate to the proposed development (noting that these are the statutory plans in effect at this time as the Draft Plans have not been adopted to date). These are the statutory development plans in force at the time of submission of this application. While both plans are set to be replaced by new development plans in 2022 (Dublin City Council) and 2023 (Fingal County Council) and a draft development plan has been published in respect of Dublin City Council (Draft Dublin City Development Plan 2022 to 2028) and Fingal County Council (Draft Fingal County Development Plan 2023-2029), these draft plans are not yet in force.

Where elements of the proposed development may be considered to materially contravene any of these Plans, then this is set out within the Material Contravention Statement, which has been prepared by Downey Planning and is submitted under separate cover.

4.0 NOTIFICATION OF AUTHORITIES

The Board also requested that, pursuant to Article 285(5) (a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the following authorities should be notified in the event of the making of an application arising from this notification in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016:

- Irish Water
- Irish Aviation Authority
- Dublin Airport Authority.
- Inland Fisheries Ireland.
- Transport Infrastructure Ireland
- National Transport Authority
- Minister of Culture, Heritage and the Gaeltacht (archaeology, architectural heritage and nature conservation)
- The Heritage Council
- An Taisce
- An Comhairle Ealaíon
- Fáilte Ireland
- The relevant Childcare Committee

Downey Planning can confirm that the above list of bodies has all been notified of the making of this planning application and copies of the relevant correspondence to them are included under separate cover as part of this application to the Board.

5.0 CONCLUSION

This Statement of Response to An Bord Pleanála's Notice of Pre-Application Consultation Opinion indicates how the items outlined within An Bord Pleanála's Opinion have been fully addressed by the applicant and design team prior to lodgment of this application to An Bord Pleanála.

The proposals incorporated into the final scheme, and in particular, due consideration has been given to the 3 items requiring further review/design amendments which has resulted in a high-quality development being presented to An Bord Pleanála for approval. It is submitted that the further documentation and additional studies undertaken and now being submitted, further support this application for Strategic Housing Development on land at Belcamp Hall (a Protected Structure), Malahide Road, Dublin 17.

This Response also addresses the specific information requested by An Bord Pleanála and identifies the source or location of the response within the accompanying planning submission documentation. A separate Statement of Response has been prepared by Waterman Moylan further addressing the

Irish Water submission dated 8th November 2021 and the concerns raised in relation to the need for a detailed Local Network Plan (Master Plan) of the Development Area.

The relevant prescribed authorities identified in the pre-application consultation opinion from An Bord Pleanála have also been notified of the submission of the planning application in accordance with Section 8(1)(b) of the Planning and Development (Housing) and Residential Tenancies Act 2016.

The changes pertaining to the design of the proposed development incorporated into the final scheme proposed are considered to result in a high-quality development now being presented to An Bord Pleanála for approval. It is submitted that the further documentation and additional studies undertaken and now being submitted, further support this application for strategic housing development at Belcamp.

In light of the foregoing, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area, and is consistent with the relevant national, regional and local planning policies and guidelines.