



An
Bord
Pleanála

**Case Reference:
ABP-311570-21**

Planning and Development (Housing) and Residential Tenancies Act 2016

Notice of Pre-Application Consultation Opinion

Proposed Development: 2,718 no. residential units (2,233 no. apartments, 485 no. houses), 2 no. creches and all associated site works. Belcamp Hall (Protected Structure), Malahide Road and R139, Belcamp, Dublin 17.

An Bord Pleanála has considered the issues raised in the pre-application consultation process and, having regard to the consultation meeting and the submission of the planning authority, 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.

An Bord Pleanála considers that the following issues need to be addressed in the documents submitted that could result in them constituting a reasonable basis for an application for strategic housing development.

Principle of Development

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.

Design Strategy

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 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.

Traffic and Transport

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.

Furthermore, Pursuant to article 285(5)(b) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is hereby notified 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:

1. 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.
2. 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. Particular regard should be had to the requirement to provide high quality and sustainable finishes and details which seek to create a distinctive character for the development. The documents should also have regard to the long-term management and maintenance of the proposed development and a life cycle report for the apartments in accordance with section 6.3 of the Sustainable Urban Housing: Design Standards for New Apartments (2020).
3. 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.
4. 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.
5. A Taking in charge map.
6. 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.

7. 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.
8. 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.
9. 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.
10. 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.

Also, pursuant to article 285(5)(a) of the Planning and Development (Strategic Housing Development) Regulations 2017, the prospective applicant is informed that 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:

- 1. Irish Water.**
- 2. Irish Aviation Authority.**
- 3. Dublin Airport Authority.**
- 4. Inland Fisheries Ireland.**
- 5. Transport Infrastructure Ireland.**
- 6. National Transport Authority**
- 7. Minister for Culture, Heritage and the Gaeltacht (archaeology, architectural heritage and nature conservation),**
- 8. The Heritage Council (archaeology, architectural heritage and nature conservation),**
- 9. An Taisce-the National Trust for Ireland (archaeology, architectural heritage and nature conservation),**
- 10. An Comhairle Ealaíon,**
- 11. Fáilte Ireland**
- 12. The relevant Childcare Committee**

PLEASE NOTE:

Under section 6(9) of the Planning and Development (Housing) and Residential Tenancies Act 2016, neither the holding of a consultation under section 6, nor the forming of an opinion under that section, shall prejudice the performance by the Board, or the planning authority or authorities in whose area the proposed strategic housing development would be situated, of any other of their respective functions under the Planning and Development Acts 2000 to 2016 or any other enactment and cannot be relied upon in the formal planning process or in legal proceedings.

Stephen O'Sullivan
Assistant Director of Planning
January, 2022