



<b>Case Reference / Description</b>	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.		
<b>Case Type</b>	Section 5 Pre-Application Consultation Request		
<b>Date:</b>	24 <sup>th</sup> November, 2021	<b>Start Time</b>	10:00 am
<b>Location</b>	Via Microsoft Teams	<b>End Time</b>	12:15 am
<b>Chairperson</b>	Stephen O'Sullivan	<b>Executive Officer</b>	Hannah Cullen

**Representing An Bord Pleanála:**

Stephen O'Sullivan, Assistant Director of Planning
Karen Hamilton, Senior Planning Inspector
Hannah Cullen, Executive Officer

**Representing Prospective Applicant:**

Michael Crowe, CCK Architects
David Averill, Sheehan & Barry Architects
Dan Egan, The Big Space
Mark Duignan, Waterman Moylan Consulting Engineers
Andrew Archer, SYSTRA
Andy Worsnop, SYSTRA
John Downy, Downey Planning
Eva Bridgeman, Downey Planning
Donal Duffy, Downey Planning

**Representing Planning Authority - Dublin City Council**

David Freeland, Assistant Planner
Diarmuid Murphy, Senior Executive Planner
Edel Kelly, Senior Transportation Officer

## Representing Planning Authority - Fingal County Council

Sean Walsh, Senior Executive Planner
Kathy Tuck, Executive Planner
Linda Lally, Senior Executive Engineer
Daragh Sheedy, Executive Engineer
Mark Finnegan, Executive Parks Superintendent
Helena Bergin, Senior Executive Arch. Conservation Officer

### Introduction

The representatives of An Bord Pleanála (ABP) welcomed the prospective applicant, Planning Authority (PA) and introductions were made via Microsoft Teams having regard to the COVID-19 restrictions.

The procedural matters relating to the meeting were as follows:

- The written record will be placed on the pre-application consultation file and will be made public once the Opinion has issued,
- ABP received a submission from the Dublin City Council & Fingal County Council on **3<sup>rd</sup> November, 2021** providing the records of consultations held pursuant to section 247 of the Planning and Development Act, 2000, as amended and its written opinion of considerations related to proper planning and sustainable development that may have a bearing on ABP's decision,
- The consultation meeting will not involve a merits-based assessment of the proposed development,
- The meeting will focus on key site-specific issues at strategic overview level, and whether the documents submitted require further consideration and/or amendment in order to constitute a reasonable basis for an application.
- Key considerations will be examined in the context of the statutory development plan for the area and section 28 Ministerial Guidelines where relevant,
- A reminder that neither the holding of a consultation or the forming of an opinion shall prejudice ABP or the PA concerned in relation to any other of their respective functions under the Planning Acts or any other enactments and cannot be relied upon in the formal planning process or in legal proceedings.

The ABP representatives acknowledged the letter dated **5<sup>th</sup> October, 2021** formally requesting pre-application consultations with ABP. The prospective applicant advised of the need to comply with the definition of SHD as set out in the (Housing) and Residential Tenancies Act of 2016, as amended, in relation to thresholds of development. The representatives of ABP advised that the Inspector dealing with the pre-application consultation request would be different to the Inspector who would deal with the application when it was submitted. Recording of the meeting is prohibited.

### Agenda

1. **Objective Balgriffin/Belcamp 6, *inter alia*, the need for a Local Area Plan and the delivery of sustainable communities, Phasing Strategy and the delivery of physical and social infrastructure**

2. **Development Strategy for the Site, *inter alia*, permitted, live and proposed planning applications**
3. **Traffic & Transport, *inter alia*, South Fingal Transportation Study, sustainable transport options, east west**
4. **Conservation Impact Assessment, *inter alia*, impact on Belcamp House**
5. **Impact on Visual Amenity, *inter alia*, (CGIs) and design & layout**
6. **Impact on Residential Amenity, *inter alia*, daylight & sunlight, overlooking, public and communal open space, unit mix**
7. **Any Other Business**

1. **Objective Balgriffin/ Belcamp 6, *inter alia*, the need for a Local Area Plan and the delivery of sustainable communities, Phasing Strategy and the delivery of physical and social infrastructure.**

**ABP Comments:**

- The focus of discussion will be on high level strategic objectives.
- Clarity needed on the implications of the absence of a Local Area Plan in Fingal, and the relative lack of detail in the LAP on the city side for this site.
- Need to ensure both sides are delivered in tandem.
- Objective Balgriffin/ Belcamp 6 of Fingal Plan
- The documentation submitted needs clarity on justification of a material contravention.
- The roll out and delivery of essential infrastructure necessary to support a new community of this scale, along with a clear phasing strategy.

**Planning Authority's Comments (Fingal):**

- Concern that the necessary infrastructure will not be delivered to serve the development if the DCC lands are not granted.
- A retail impact assessment is necessary to ensure the retail delivered will serve the projected population.

**Planning Authority's Comments (Dublin City Council):**

- Take CE Opinion submitted to the Board as read, no further comments.

**Prospective Applicant's Comments:**

- The lands are located on 2 LA's, have to be treated as a holistic area.
- 16 years since the lands were zoned, not reasonable to delay further due to absence of an LAP.
- Clarehall, Balgriffin and Clongriffin are within the surrounding area.
- The lands are located proximate to the biggest economic hub in Ireland, (Dublin Airport).
- The SHD process is the best method of procurement to bridge the gap between the DCC and Fingal lands.
- There is a quality bus corridor to the city centre within walking distance.

**2. Development Strategy for the site, inter alia, permitted, live and proposed planning applications.**

**ABP Comments:**

- There was some difficulty with navigating through the submitted documents in relation to strategy of how the proposals fit in with the existing area.
- At application stage ensure all documentation links together including those permitted developments, those currently in the planning system and those proposed.
- The justification for the size of the school and the location separated from the public open space.
- The design of the proposed development along the R139 and the need for a strong urban streetscape.
- The need for defined character areas.

**Planning Authority's Comments (Fingal):**

- There are a number of live applications on site, the main goal is the delivery of Belcamp House back to its former glory which will need to be undertaken holistically.
- There is no amenity currently on site.
- Dispute that the site is a brownfield site.
- A Retail Impact Assessment should be prepared to demonstrate the amount of retail could be sufficient for the number of residents.
- Scope for the materiality to be broken up to create different areas, currently reading as 1 monolithic block.

**Planning Authority's Comments (Dublin City Council):**

- Emphasis on connections from the town centres to the development proposals.

**Prospective Applicant's Comments:**

- There is currently a double layer of palisade fencing around Belcamp House and there has still been unauthorised entry by 3<sup>rd</sup> parties.
- Clongriffin Train Station is a 10-minute bike journey from the western end of the site.
- Existing services in the area include Clarehall Shopping Centre and a gym.
- There will be certainty on the connection of the Malahide Road to the R132.
- The PA require the hedgerows along the R139 to be retained and a strong urban edge can not be achieved.

**Further ABP Comments**

- Issue as to whether it would be appropriate to develop site without urban frontage onto R139 given the functional and visual severance caused by the current state of the road

**3. Traffic & Transport, *inter alia*, South Fingal Transportation Study, sustainable transport options, east west.**

**ABP Comments:**

- Clarity on the delivery of the East West Link Road (EWLR)
- Unclear of the rollout of infrastructure proposed.
- Pedestrian and cycle path/links should be prioritised.
- Public transport is likely to be the most used method transport.
- The NTA and TII should be consulted as they will be involved in any application process.
- Query in relation to the South Fingal Transport Study.

**Planning Authority's Comments (Fingal):**

- There is a lack of infrastructure connecting to a wider network.
- The scheme appears very car dominated.
- Flag the functionality of cycling through the green link during early morning or late evening due to the poor lighting.

**Planning Authority's Comments (Dublin City Council):**

- A new development plan is due to go on display tomorrow (25<sup>th</sup> November 2021), there is a new roads objective for the Malahide Road and the re-alignment of the N32. The link road across the R139 into the applicant's site will be altered.
- The scheme requires a local transport plan based on the local area needs, scope to work alongside the applicant on this item.
- The proposal is not supported as it will lead to a car dominant community and the existing or proposed infrastructure can not support a scheme of this scale.

**Prospective Applicant's Comments:**

- Clarehall junction proposals by bus connects to provide upgrades, provision of a bicycle signalised junction which has been approved by Fingal County Council, a new link from Clarehall to Stockhole Lane is currently being discussed and future connectivity/ bus routes to the airport and Swords.
- An interim shuttle service is proposed in the beginning phases of development from Belcamp to Clongriffin.
- High quality pedestrian & cycle links proposed within the site reducing car parking and promoting cycling including more bike parking.
- There has not yet been any engagement with NTA or TII.

#### **4. Conservation Impact Assessment, inter alia, impact on Belcamp House**

##### **ABP Comments:**

- CGI's submitted at application stage should give more detail in relation to Belcamp House.
- The impact assessment must document how the proposals will fit in with the curtilage of Belcamp House.
- The conservation impact assessment does not include sufficient justification for the development is in the context of Belcamp House.

##### **Planning Authority's Comments (Fingal):**

- More simplistic approach to be taken in relation to the blocks surrounding the walled garden.
- Until Belcamp House is brought forward there should be no development on this site.
- The restoration and phasing of Belcamp house has to be integrated into the overall proposal.

##### **Planning Authority's Comments (Dublin City Council):**

- Take CE opinion as read, no further comments.

##### **Prospective Applicant's Comments:**

- Actively working alongside Fingal County Council in relation to the restoration of Belcamp House and it will be included in the documentation.
- There will be additional information in the Conservation Impact Assessment.
- Aware there are a number of significant views and CGI's to be prepared and submitted at application stage which will be assessed by EIA and Conservation Assessment.
- Can revisit the juxtaposition of surrounding blocks/units at the walled garden.

#### **Agenda Items 5 and 6 were dealt with together**

##### **5. Impact on Visual Amenity, *inter alia*, (CGIs) and design & layout**

##### **6. Impact on Residential Amenity, *inter alia*, daylight & sunlight, overlooking, public and communal open space, unit mix**

##### **ABP Comments:**

- The proposed area of public open space is disjointed from the school.
- Issue in relation to the wayleave should be further discussed with the PA.
- The overall functionality of the public and private open space should be further detailed at application stage.
- The sunlight and daylight indicate that the BRE minimum standards can not be met. The overall impact on residential amenity should be addressed.
- The sunlight/ daylight analysis should include an assessment of all communal open space.
- The submitted visuals should include sections at key areas

**Planning Authority's Comments (Fingal):**

- Main concern is in relation to the plaza area as very limited visuals have been submitted, it does not read as inviting or easily accessible for residents.
- The design of the apartment blocks beside the walled garden of Belcamp House.

**Planning Authority's Comments (Dublin City Council):**

- The heights proposed acknowledge the pattern of development, no significant objections to this matter.
- There is a disparity between the DCC and Fingal lands, scope to link character of the two areas.
- There should be a greater mix of units provided throughout the development, in particular the significant amount of one and two beds in DCC.
- There is no significant focal or gathering point within the proposals.
- A landscape phasing plan is required.

**Prospective Applicant's Comments:**

- The PA's comments are noted and will be addressed at application stage.
- There is a biodiversity 20-meter wayleave between the proposed development and R139. This has led to the set back of the blocks from the edge of the R139.

**Further ABP Comments:**

- Issue as to what planning status the wayleave along the R139 might have, the ecological value of the planting along a new road dating from the 1990s, whether retention of that planting would prejudice the urban development of the site given the functional and visual severance arising from the current condition of the R139

**7. Any Other Business****ABP Comments:**

- Further details required in relation to Part V provisions/ proposals, further discussion with PA recommended.
- The applicant should be cognisant of green infrastructure including the River Mayne.

**Planning Authority's Comments (Fingal):**

- No additional comments.

**Planning Authority's Comments (Dublin City Council):**

- The coordinated strategy across the 2 sites is positive, no additional comments.

**Prospective Applicant's Comments:**

- Further consultation will be sought with DCC and Fingal County Council.

## Conclusion

The representatives of ABP emphasised the following:

- There should be no delay in making the planning application once the public notice has been published.
- A Schedule of Documents and Drawings should be submitted with the Application.
- Sample notices, application form and procedures are available on the ABP website.
- Irish Water would like prospective applicants to contact Irish Water at [cdsdesignqa@water.ie](mailto:cdsdesignqa@water.ie) **between the Pre-Application Consultation and Application stages**, to confirm details of their proposed development and their proposed design.
- The email address to which applicants should send their **applications** to Irish Water as a prescribed body is [spatialplanning@water.ie](mailto:spatialplanning@water.ie).

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Stephen O'Sullivan  
Assistant Director of Planning  
January, 2022