

DOWNEY

29 Merrion Square, D02RW64

Statement of Consistency with Planning Policy

**Lands at Belcamp Hall (a Protected Structure),
Malahide Road, Dublin 17.**

Applicant: Gerard Gannon Properties

May 2022

TABLE OF CONTENTS

1.0	Introduction	4
2.0	National Policy and Guidelines	5
2.1	Project Ireland 2040: National Planning Framework.....	5
2.2	Project Ireland 2040: National Development Plan 2021-2030	8
2.3	Housing For All – a New Housing Plan For Ireland.....	10
2.4	Affordable Housing Act 2021 & Housing Circular 28/2021	11
2.5	The Housing Agency Statement of Strategy 2022-2024	11
2.6	Residential Densities in Towns and Villages (Circular Letter: NRUP 02/2021)	12
2.7	Rebuilding Ireland, An Action Plan for Housing and Homeless (2016).....	13
2.8	Sustainable Residential Development in Urban Areas and Best Practice Urban Design Guidelines (2009).....	14
2.9	Delivering Homes, Sustaining Communities Best Practice Guidelines – Quality Homes for Sustainable Communities (2007).....	18
2.10	Sustainable Urban Housing Guidance: Design Standards for New Apartments (December 2020)	18
2.11	Urban Development and Building Heights Guidelines for Planning Authorities (Dec 2018).....	22
2.12	Childcare Facilities: Guidelines for Planning Authorities (2001).....	33
2.13	Childcare facilities operating under the Early Childhood Care and Education (ECCE) Scheme (Circular Letter: PL 3/2016).....	34
2.14	Smarter Travel: A Sustainable Transport Future	35
2.15	Design Manual for Urban Roads and Streets (DMURS) (2013).....	36
2.16	Retail Planning Guidelines (2012) and Retail Design Manual (2012).....	36
2.17	National Cycle Manual (June 2011)	37
2.18	EIA Directive	38
2.19	Bird and Habitats Directive - Appropriate Assessment	39
2.20	The Planning System and Flood Risk Guidelines (2009)	40
2.21	All-Ireland Pollinator Plan 2021-2025	40
2.22	National Adaption Framework: Planning for a Climate Resilient Ireland	41
2.23	Climate Action Plan 2021	41
2.24	Architectural Heritage Protection Guidelines for Planning Authorities	42
3.0	Regional Policy and Guidelines	43
3.1	Regional Spatial & Economic Strategy for the Eastern & Midland Region	43
3.2	Transport Strategy for the Greater Dublin Area 2016-2035.....	46
4.0	Local Planning Policy	46
4.1	Dublin City Development Plan 2016-2022.....	46
4.1.1	<i>Overarching Considerations</i>	46
4.1.2	<i>Core Strategy & Housing Strategy</i>	47
4.1.3	<i>Quality Housing</i>	49
4.1.4	<i>Sustainable Neighbourhoods and Communities</i>	50

4.1.5	<i>Movement and Transport</i>	51
4.1.6	<i>Land Use Zoning</i>	53
4.1.7	<i>Strategic Development and Regeneration Areas (SDRA)</i>	54
4.1.8	Development Management Standards	55
4.1.9	Childcare Facilities	63
4.2	Clongriffin-Belmayne Local Area Plan 2012-2018	64
4.2.1	<i>Movement and Transport</i>	64
4.2.2	<i>Urban Design</i>	65
4.2.3	<i>Community and Social Infrastructure Policy</i>	66
4.2.4	<i>Infrastructure and Services Strategy</i>	67
4.2.5	<i>Sustainability Strategy</i>	68
4.2.6	<i>Density</i>	69
4.2.7	<i>Height</i>	69
4.2.8	<i>Phasing & Implementation</i>	70
4.3	Fingal County Council Development Plan 2017-2023	73
4.3.1	<i>Overarching Considerations</i>	73
4.3.2	<i>Core Strategy & Housing Strategy</i>	73
4.3.3	Sustainable Neighbourhoods and Communities	75
4.3.4	Movement and Transport	76
4.3.5	<i>Cultural Heritage</i>	77
4.3.6	Land Use Zoning	79
4.3.7	Site Specific Objectives and Designations	82
4.3.8	Development Management Standards	84
4.3.9	Space for Play; A Play Policy for Fingal	108
5.0	Material Contrevention of Development Plan	109
6.0	Conclusion	109

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1.0 INTRODUCTION

Downey, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this Statement of Consistency with Planning Policy, on behalf of the applicant, Gerard Gannon Properties, to accompany a planning application to An Bord Pleanála for a proposed Strategic Housing Development on lands at Lands at Belcamp Hall (a Protected Structure), Malahide Road, Belcamp, Dublin 17.

A 10-year planning permission is sought by Gerard Gannon Properties for a proposed Strategic Housing Development on lands at Belcamp Hall (protected structure), Malahide Road and R139 Road, Belcamp, Dublin 17. The proposed development will consist of the construction of 2,527 no. residential units comprising 1,780 no. apartments (624 no. 1-beds, 990 no. 2-beds, 165 no. 3 beds), 274 no. duplex units (22 no. 1-beds, 40 no. 2-beds, 212 no. 3-bed) and 473 no. houses (16 no. 2-bed, 385 no. 3-beds and 72 no. 4-bed), 2 no. childcare facilities, retail/commercial units comprising a total of 4,477.5 sq.m., all in buildings ranging in height from 1 storey to 9 storeys (of which 1,230 no. residential units and 1,030 sq.m. commercial area are proposed within Dublin City and 1,296 no. residential units and 3,447.5 sq.m. commercial area are proposed within Fingal County); car parking; bicycle parking; landscaping and public open space; boundary treatments; public lighting; 2 no. vehicular/pedestrian accesses onto R139 Road and a Bus Gate and pedestrian access onto the R139 Road; vehicular/pedestrian access from the Malahide Road via the proposed East-West Link Road; proposed pedestrian access via Carr's Lane; proposed upgrades to public realm including works to R139 Road; and all associated engineering and site works necessary to facilitate the development.

We note that this SHD application is for the remaining land bank at Belcamp and can be seen as representing the final phase of development of the overall lands. Works have commenced on the restoration of Belcamp Hall itself as well as on the initial Phase 1 of the development (parent permission for Phase 1 granted under Reg. Ref. F15A/0609). This SHD application is a standalone application. The development history of the site is discussed in more detail within Section 3 of the Supporting Planning Statement, which was prepared by Downey Planning and submitted under separate cover.

This Statement of Consistency with Planning Policy has been prepared in accordance with the Planning and Development (Housing) and Residential Tenancies Act 2016 (the "2016 Act") and in accordance with the requirements of the Planning and Development Regulations 2001-2017 (as amended by Planning and Development Regulations 2001 as amended) and the "Strategic Housing Development: Section 4 Applications to An Bord Pleanála – Guidance for Applicants" issued by An Bord Pleanála.

In accordance with Section 5(5)(b) of the 2016 Act this Statement of Consistency demonstrates that the proposed development is consistent with the relevant objectives of the relevant development plans or local area plan concerned, as well as with relevant guidelines issued by the Minister under section 28 of the Planning and Development Act 2000 (as amended) (the "2000 Act"). This Statement should be read in conjunction with the accompanying detailed documentation prepared by the design team.

For details of compliance with the quantitative standards for residential units of the "Sustainable Urban Housing: Design Standards for New Apartments (2020)", "Quality Housing for Sustainable Communities Best Practice Guidelines for Delivering Homes Sustaining Communities (2007)", the

Dublin City Development Plan 2016-2022, the Clongriffin-Belmayne Local Area Plan (2012-2018 as extended) and the Fingal Development Plan 2017-2023¹, please refer to the Housing Quality Assessments (Detailed Schedule of Accommodation) and Architectural Design Statements prepared by CCK Architects & Urban Designers which are included as part of the architectural planning pack.

2.0 NATIONAL POLICY AND GUIDELINES

The key provisions of the national planning policy, including Section 28 Guidelines, as it relates to the proposed development are now set out in the following sections. The key national policy and guidance documents of relevance include:

- Project Ireland 2040: National Planning Framework
- Project Ireland 2040: National Development Plan 2021-2030
- Housing For All – a New Housing Plan for Ireland (2021)
- Affordable Housing Act 2021 & Housing Circular 28/2021
- The Housing Agency Statement of Statement 2022-2024
- Residential Densities in Towns and Villages (Circular Letter: NRUP 02/2021)
- Rebuilding Ireland, An Action Plan for Housing and Homelessness (2016)
- Sustainable Residential Development in Urban Areas and Best Practice Urban Design Manual Guidelines (2009)
- Delivering Homes, Sustaining Communities: Statement on Housing Policy (2007)
- Quality Housing for Sustainable Communities (2007)
- Sustainable Urban Housing: Design Standards for New Apartments (December 2020)
- Childcare Facilities: Guidelines for Planning Authorities (2001)
- Design Manual for Urban Roads and Streets (DMURS)
- Urban Development and Building Heights: Guidelines for Planning Authorities (December 2018)
- Smarter Travel: A Sustainable Transport Future
- National Cycle Manual (2011)
- The Planning System and Flood Risk Guidelines (2009)
- All-Ireland Pollinator Plan 2021-2025
- National Adaptation Framework: Planning for a Climate Resilient Ireland (January 2018)
- Climate Action Plan 2021
- Architectural Heritage Protection Guidelines for Planning Authorities

2.1 Project Ireland 2040: National Planning Framework

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 and are not likely to be in force when a decision is being made in respect of the proposed development.

The National Planning Framework is “the Government’s high-level strategic plan for shaping the future growth and development of our country out to the year 2040”. It is a Framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment- from our villages to our cities and everything in between. It is stated within the National Planning Framework that *“a major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages”*. It is also stated that there will be an ongoing shift in population and jobs to the east and to the counties around Dublin in particular. The NPF will support the future growth and success of Dublin as Ireland’s leading global city of scale, by better managing Dublin’s growth to ensure that more of it can be accommodated within and close to the city.

According to the National Planning Framework, Dublin needs to accommodate a greater proportion of the growth it generates within its metropolitan boundaries and to offer improved housing choice, transport mobility and quality of life. Dublin’s continued performance is critical to Ireland’s competitiveness.

The NPF states that *“the long-term vision for Ireland’s housing future aims to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future.”*

It is outlined within the Plan that future homes are required to be located where people have the best opportunities to access a high standard quality of life. In Ireland, the location of housing has taken on a dispersed and fragmented character which has led to people living further away from their jobs and often being at a sizeable remove from important services such as education and healthcare. It is stated that it is important to, *“prioritise the location of new housing provision in existing settlements as a means to maximising a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure”*.

In terms of Dublin City and the Metropolitan Area, the National Planning Framework 2040 states that:

“Dublin needs to accommodate a greater proportion of the growth it generates within its metropolitan boundaries and to offer improved housing choice, transport mobility and quality of life. Dublin also needs to become a greener, more environmentally sustainable city in line with international competitors. At a metropolitan scale, this will require focus on a number of large regeneration and redevelopment projects, particularly with regard to underutilised land within the canals and the M50 ring and a more compact urban form, facilitated through well designed higher density development.”

The NPF has a number of national policy objectives which are relevant to this application, which include:

“National Policy Objective 3a: Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements.”

“National Policy Objective 4: *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.”*

“National Policy Objective 11: *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.”*

“National Policy Objective 13: *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.”*

“National Policy Objective 33: *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.”*

“National Policy Objective 35: *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 and increased building heights”.*

It is evident that there is a strong emphasis placed on increased building heights in appropriate locations within existing urban centres and along public transport corridors. As such it is respectfully submitted that the proposed building heights ranging from 2 no. storeys to 9 no. storeys is in line with Government guidance and evolving trends for sustainable residential developments in urban areas.

The National Core Principles contained within the National Planning Framework set out the standards for the delivery of housing to be implemented over the period to 2040. The Core Principles are stated as the following:

“Ensure a high standard quality of life to future residents as well as environmentally and socially sustainable housing and placemaking through integrated planning and consistently excellent design.

- *Allow for choice in housing location, type, tenure and accommodation in responding to need.*
- *Prioritise the location of new housing provision in existing settlements as a means to maximising a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure.*

- *Tailor the scale and nature of future housing provision to the size and type of settlement where it is planned to be located.*
- *Integrate housing strategies where settlements straddle boundaries (county and/or regional).*
- *Utilise existing housing stock as a means to meeting future demand”.*

It is envisaged that all future residential developments will be required to provide multiple housing and accommodation types in order to meet the challenges of providing for an increasing population where the composition of households is to be comprised of smaller family units and an increased age dependent population are both expected to grow by 2040. Downey are of the considered opinion that the proposed residential development adheres to the core principles of the National Planning Framework and will provide multiple accommodation types for specific housing needs.

In relation to apartment provision, it is considered that the proposed apartment development is in line with the objectives of the National Planning Framework, which also envisages increased apartment provision to be provided as part of residential proposals, particularly in urban areas. The NPF states that, *“to more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and upwards, rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Ireland’s cities.”* The National Planning Framework also states that *“this is underpinned by ongoing population growth, a long-term move towards smaller average household size, an ageing and more diverse population, greater mobility in the labour market and a higher proportion of households in the rented sector.”* The proposed apartment development is located in a strategic location in close proximity to Dublin’s City Centre. The National Planning Framework also states that *“while apartments made up 12% of all occupied households in Ireland and 35% of occupied households in the Dublin City Council area in 2016 (census data)”*. It is evident that Ireland is a long way behind European averages in terms of the numbers and proportion of households living in apartments, especially in our cities and larger towns. It is stated within the Project Ireland 2040 plan that *“in many European countries it is normal to see 40-60% of households living in apartments.”*

Apartment developments have become an increasingly attractive and desirable housing option for a range of household types and tenures, building on and learning from experience to date, and that the economic and regulatory conditions are such that apartment development attracts investment that will result in greater delivery of apartments in Ireland’s cities and towns and other appropriate locations. It is evident that apartment developments are required in urban areas to meet the current demand for housing, particularly in Dublin. It is therefore considered that the provision of 2,527 no. residential units of which 1,780 no. units are apartments, 473 no. units are houses and 274 no. units are duplex units with 2 no. childcare facilities on the subject site will assist in achieving the objectives of the National Planning Framework.

2.2 Project Ireland 2040: National Development Plan 2021-2030

The renewed National Development Plan sets out the investment priorities that will underpin the successful implementation of the National Planning Framework (NPF). This will guide national, regional and local planning and investment decisions in Ireland over the next two decades to cater for an expected population increase of over 1 million people.

Resolving the systemic factors underlying the current housing crisis is at the heart of the NPF and reflecting this, housing and sustainable urban development is a priority for the National Development Plan. In this regard, the NDP states that there is a *“need to provide in excess of half-million more homes over the period to 2040 corresponds to a long-term trend of 25,000 new homes every year. A higher level of output is needed in the short to medium-term to respond to the existing deficit that has given rise to the housing crisis.”*

Furthermore, the NDP states that *“the continuation of existing patterns of development accentuates the serious risk of economic, social and environmental unsustainability through, for example, placing more distance between where people work and where people live, and increasing energy demand. The NPF highlights the urgent requirement for a major uplift of the delivery of housing within the existing built-up areas of cities and other urban areas. It has a particular focus on brownfield development, targeting derelict and vacant sites that may have been developed before but have fallen into disuse.”*

There are a number of strategic outcomes identified within the NDP which support the proposed development. Such outcomes include:

National Strategic Outcome 1: Compact Growth – *“This outcome aims to secure the sustainable growth of more compact urban and rural settlements supported by jobs, houses, services and amenities, rather than continued sprawl and unplanned, uneconomic growth. This requires streamlined and co-ordinated investment in urban, rural and regional infrastructure by public authorities to realise the potential of infill development areas within our cities, towns and villages. This will give scope for greater densities that are centrally located and in many cases publicly owned, as well as bringing life and economic activity back into our communities and existing settlements. Creating critical mass and scale in urban areas with enabling infrastructure, in particular increased investment in public and sustainable transport and supporting amenities, can act as crucial growth drivers. This can play a crucial role in creating more attractive places for people to live and work in, facilitating economic growth and employment creation by increasing Ireland’s attractiveness to foreign investment and strengthening opportunities for indigenous enterprise.”*

National Strategic Outcome 4: Sustainable Mobility – *“The expansion of attractive and sustainable public transport alternatives to private based car transport will reduce congestion and emissions and enable the transport sector to cater in an environmentally sustainable way for the demands associated with longer term population and employment growth envisaged under the NPF. Furthermore, the provision of safe alternative active travel options such as segregated cycling and walking facilities can also help alleviate congestion and meet climate action objectives by providing viable alternatives and connectivity with existing public transport infrastructure.”*

The proposed development will provide for a sustainable residential development on appropriately zoned lands, in a highly accessible location within the North Fringe area, which promotes compact urban growth and a good quality of life. The proposed development will be an attractive, vibrant urban

centre for people to live in, supported by high-quality physical and social infrastructure as well as vast recreational amenities such as Belcamp Park, Balgriffin Park, Fr. Collins Park, and the various sports clubs and centres within the area. Moreover, the overarching goal for the Belcamp lands is to create a self-sustaining development with appropriate provision of public open space, recreation opportunities and facilities to support future residence. The public realm strategy includes a new Town Square, greenway corridors, the Mayne River Greenway and Class 1 Open Space to include active recreation facilities such as;

- Proposed pitches of multiple sizes,
- Club House, Changing Rooms & Gym,
- Proposed parking areas including overflow parking over reinforced grass area, and
- Proposed flood lighting.

The proposal will ensure walking and cycling are viable options for the community, with the area also well served by existing public transport infrastructure, all of which will ensure that the future population utilise sustainable public transport and active travel options rather than private/car transport. It is therefore considered that the provision of 2,527 no. residential units (1,780 no. apartments, 473 no. houses, and 274 no. duplex units) with ancillary amenity facilities and 2 no. childcare facilities on the subject site will assist in achieving the objectives of the National Development Plan 2018-2027.

2.3 Housing For All – a New Housing Plan For Ireland

The Housing for All: A New Housing Plan for Ireland states that Ireland’s housing system is not meeting the needs of enough of our people, and therefore, it needs to increase new housing supply to an average of at least 33,000 new units per year over the next decade. This will include over 10,000 social homes each year over the next five years, with 9,500 of these being new-builds, and an average of 6,000 affordable homes for purchase or rent. The plan also includes measures to support availability of the land, workforce, funding, and capacity to enable both the public and private sectors to meet the targets. The plan is based on four pathways, leading to a more sustainable housing system:

- Support home ownership and increase affordability;
- Eradicate homelessness, increase social housing delivery, and support social inclusion;
- Increase new housing supply and;
- Address vacancy and make efficient use of existing stock.

Outlined in the Plan, the State must act decisively to increase supply of both private and public housing. An average of 33,000 new units, on average, per annum up to and including 2030. This will include, on average, 10,000 social housing units, 4,000 homes for Affordable Purchase, 2,000 Cost Rental homes and 17,000 private homes over the lifetime of the plan (to the end of 2030) the 300,000 required homes are expected to consist of: 90,000 social homes; 36,000 Affordable Purchase homes, 18,000 ‘Cost Rental’ homes and approximately 156,000 private homes. One of the key measures in achieving this is to use vacant and underutilised land.

The proposed development is in line with the ambitious goals within Housing For all. This National Policy Document has recognised the need to cater for a broad range of buyers within the market, in

order to achieve a sustainable housing system. The residential mix provides a good choice for future residents and caters for a broad range of housing requirements within the market, including first-time buyers, young families, singles, downsizers, and retirees. The choice of housing typologies within this proposed scheme, better supports a mix of age & tenure.

It is submitted that provision of 2,527 no. residential units on the subject site will help the Government to achieve the objectives of the Housing for All Plan in increasing the housing output. Therefore, it is considered that the proposed development is consistent with the development framework in this regard.

2.4 Affordable Housing Act 2021 & Housing Circular 28/2021

In July 2021, the Affordable Housing Act 2021 was published, aiming to address problems associated with the high cost of housing for the portion of the population that do not qualify for social housing. Coming to effect from 3rd September 2021, the Housing Circular 28/2021, amends Part V of the Planning and Development Act 2000. The Programme for Government contained commitments in relation to expanding Part V to encompass affordable purchase and cost rental units and introducing affordable homes requirements to Part V. Part 6 of the Affordable Housing Act 2021, which was enacted on 21 July 2021, gives effect to this commitment.

The principal change to Part V made by these amendments is to increase the Part V contribution for new housing developments from 10% social housing to a mandatory 20% requirement, at least half of which must be applied to social housing provision and up to half of which may be applied to affordable and cost rental housing. It is noted that these changes to Part V primarily apply to land purchased on or after 1 August 2021. Any new planning permissions for housing development on that land will have a 20% Part V requirement, which applies to the development lands.

It is considered that the proposed development is consistent with the Affordable Housing Act 2021, Housing Circular 28/2021, and the requirements under Part V of the Act as it is proposed to provide 20% of the housing units for social and affordable housing, i.e., a total of 505 units across the 3 phases of development. For further details, please refer to the enclosed Part V Validation Letter from Fingal County Council and Dublin City County Council with associated indicative costings and layout.

2.5 The Housing Agency Statement of Strategy 2022-2024

Launched in late January of 2022, the Housing Agency's Statement of Strategy, outlines how more affordable housing, increasing the supply of social and private homes and addressing social inclusion issues such as homelessness and ageing will be the priorities for the work of The Housing Agency over 2022-2024. The Statement of Strategy frames the work of The Housing Agency under three broad themes:

- Being a centre for housing knowledge;
- Bridging housing supply and demand; and,
- Building capacity for housing.

It also outlines how, over the coming years, the Housing Agency will use research, informed policy insights and data to work “to achieve a housing system that meets the housing needs of the nation and promotes viable, sustainable communities”.

The Housing Agency’s Strategic Plan 2022-2024 has been framed in the context of supporting Housing for All, the Government’s housing plan for Ireland and key trends in the housing system including:

- Diverse and changing housing needs for people living in Ireland.
- Long-term government policy and strategic planning for the Irish housing system.
- A continuing focus on building inclusive, sustainable communities.

It is submitted that provision of 2,527 no. residential units on an appropriately zoned land under Fingal Development Plan 2017-2023 and the Dublin City Development Plan 2016-2022 would help utilising an existing capacity within Balgriffin & Belcamp and facilitate meeting the housing target for the area and the overall County. Therefore, it is considered that the proposed development is consistent with the foregoing Strategy in this regard.

2.6 Residential Densities in Towns and Villages (Circular Letter: NRUP 02/2021)

The purpose of this Circular, issued on 21st April 2021, is to provide clarity in relation to the interpretation and application of current statutory guidelines, in advance of issuing updated Section 28 guidelines that will address sustainable residential development in urban areas, later in 2021. It is considered important to address this matter in the context of both the need for significantly increased and more sustainable housing supply throughout Ireland, and national recovery from the Covid-19 pandemic.

Outlined in the Circular, while the *Sustainable Residential Development Guidelines* clearly encourage net densities in the 35-50 dwellings per hectare range within cities and larger towns, net densities of 30-35 dwellings per hectare may be regarded as acceptable in certain large town contexts and net densities of less than 30 dwellings per hectare, although generally discouraged, are not precluded in large town locations.

These “outer suburban” provisions apply to cities and larger towns, and the *Sustainable Residential Development Guidelines* define larger towns as having a population in excess of 5,000 people. Large towns therefore range from 5,000 people up to the accepted city scale of 50,000 people. Given the very broad extent of this range and variety of urban situations in Ireland, it is necessary for An Bord Pleanála and Planning Authorities to exercise discretion in the application and assessment of residential density at the periphery of large towns, particularly at the edges of towns in a rural context.

Accordingly, the full range of outer suburban density, from a baseline figure of 30 dwellings per hectare (net) may be considered, with densities below that figure permissible subject to Section 5.12 of the *Sustainable Residential Development Guidelines*. It is also clarified that in certain circumstances, the neighbourhood or district referred to in Section 5.12, may comprise a significant portion of a rural town.

Considering that the Census 2016 recorded a population of 3,113 people for Balgriffin, the town stands within the larger towns category, contributing to consolidation of Dublin Metropolitan Area. Accordingly, the proposed development of the subject lands is submitted to strengthen the urban role of Belcamp/Balgriffin and reinforcing the vital role of Belcamp in the settlement's hierarchy of the County, and therefore, is considered to be consistent with the foregoing Circular. In this regard the development will provide an overall net density of 66.7 units per hectare, with the net density for the lands within the administrative area of Dublin City Council (i.e. Belcamp south) being 112.8 units per hectare and the net density for the lands within the administrative area of Fingal County Council (i.e. Fingal north) being 27.3 units per hectare.

2.7 Rebuilding Ireland, An Action Plan for Housing and Homeless (2016)

'Rebuilding Ireland, an Action Plan for Housing and Homelessness', provides a multi-stranded, action-oriented approach to achieving many of the Government's key housing objectives. The overarching aim of the Plan is to ramp up delivery of housing from its current undersupply across all tenures to help individuals and families meet their housing needs, and to help those who are currently housed to remain in their homes or be provided with appropriate options of alternative accommodation especially those families in emergency accommodation.

The Action Plan comprises of 5 key pillars which are: addressing homelessness, accelerating social housing, building more homes, improving the rental sector and utilising existing housing. The Action Plan sets ambitious targets to double the annual level of residential construction to 25,000 homes and deliver 47,000 units of social housing in the period to 2021, while at the same time making the best use of the existing housing stock and laying the foundations for a more vibrant and responsive private rental sector.

Achieving the aim of accelerated delivery will contribute to the following core objectives:

- Addressing the unacceptable level of households, particularly families, in emergency accommodation;
- *Moderating rental and purchase price inflation, particularly in urban areas;*
- *Addressing a growing affordability gap for many households wishing to purchase their own homes;*
- *Maturing the rental sector so that tenants see it as one that offers security, quality and choice of tenure in the right locations and providers see it as one they can invest in with certainty;*
- *Ensuring housing's contribution to the national economy is steady and supportive of sustainable economic growth; and,*
- *Delivering housing in a way that meets current needs while contributing to wider objectives such as the need to support sustainable urban and rural development and communities and maximise the contribution of the built environment to addressing climate change.*

The provision of 2,527 no. residential units (1,780 no. apartments, 473 no. houses and 274 no. duplex units) with 2 no. childcare facility on the application site will help the Government to achieve the objectives of the Housing Action Plan. Thus, it is submitted that the proposed development is consistent with the policy in this regard as it will help to increase housing supply in both the private and rental market and in turn assist in the provision of affordable housing, through providing social

and affordable housing under Part V of the Planning and Development Act, 2000 as well as increased housing supply.

Furthermore, one of the five pillars which form the Action Plan refers to rental accommodation, it has a key objective of “*addressing the obstacles to greater private rented sector delivery, to improve the supply units at affordable rents,*” and emphasizes the importance of rental housing for enabling the housing market to adapt to the changing needs of the population. In order to ‘*improve the rental sector*’ which is the vision for this pillar, there are several key actions proposed as part of the Action Plan, these are as follows:

- *Develop a strategy for a viable and sustainable rental sector*
- *Introduce legislation on balanced arrangements for tenancy terminations*
- *Review the standards for rental accommodation*
- *Enhance the role of the Residential Tenancies Board*
- *Introduce an Affordable Rental Scheme*
- ***Encourage “build to rent”***
- *Support greater provision of student accommodation.*

Therefore, the ‘Build to Rent’ element of this scheme (contained within Blocks 1 and 4 of the southern portion of the site) is thoroughly encouraged. The document acknowledges that the country’s housing stock was not built with the needs of long-term renters in mind (at the time when the Action Plan was prepared), thus the proposed development would assist in the delivery of this scheme for the rental market and support the housing stock with the provision of new residential units in this strategic location. It is important to note that the ‘Build to Rent’ model that pertains to part of this development is supported by the ‘*Sustainable Urban Housing: Design Standards for New Apartments*’ guidelines and other statutory policy.

2.8 Sustainable Residential Development in Urban Areas and Best Practice Urban Design Guidelines (2009)

This document reviews and updates the Residential Density Guidelines (1999), and its aim is to assist both planning authorities and developers in meeting certain standards in the design of residential development. The main objective of the Sustainable Residential Development in Urban Areas Guidelines is to produce high-quality sustainable developments through providing:

- *Quality homes and neighbourhoods;*
- *Places where people actually want to live, to work and to raise families; and*
- *Places that work - and will continue to work – and just for us, but for our children and for our children’s children.*

The Guidelines state that sustainability is about the integration of schools, community facilities, employment, transport and amenities with the housing development process in a timely, cost-effective way.

Plan-Led Location of Development

The aim of the Guidelines is to set out the key planning principles which should be reflected in development plans and local area plans and which should guide the preparation and assessment of planning applications for residential developments in urban areas. The Guidelines support a plan-led approach to development in accordance with the Planning and Development Act, 2000 (as amended) and state:

“The scale, location and nature of major new residential development will be determined by the development plan, including both the settlement strategy and the housing strategy.”

In this regard, the subject site is zoned as a Strategic Development Regeneration Area (SDRA) (SDRA 1 North Fringe Clongriffin-Belmayne) under the Dublin City Development Plan 2016-2022 and falls under the ‘RA – Residential Area’, ‘OS – Open Space’, and ‘GB – Greenbelt’ zoning designations of the Fingal Development Plan 2017-2023. It is noted that both residential, retail and childcare facilities are a permitted in principle land use.

Section 2.3 of the Guidelines promote a sequential approach to the zoning of residential lands. In this regard, the Guidelines state that:

“Zoning shall extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference, encouraging infill opportunities, and that areas to be zoned shall be contiguous to existing zoned development lands and that any exception must be clearly justified in the written statement of the development plan.”

The subject site is located on appropriately zoned lands at Belcamp, Northern Cross, and forms part of the North Fringe area of Dublin City. The site is contiguous to existing development and that under construction which have permitted under the parent application Reg. Ref. F15A/0609 & PL06F 24805; on the Belcamp Hall lands and has been appropriately zoned for approximately 20 years. In light of this, the zoning and future development of the subject site is in accordance with these Guidelines.

The Guidelines also support increased residential densities particularly for sites located in ‘Outer Suburban/Greenfield’ sites, particularly for such sites on the periphery of cities or larger towns, as it states:

“The greatest efficiency in land usage on such lands will be achieved by providing net residential densities in the general range of 35-50 dwellings per hectare and such densities (involving a variety of housing types where possible) should be encouraged generally.”

The subject site will achieve an overall net density of c.66.7 dwellings per hectare (c. 37 dwellings per hectare gross). It is considered that the site is classified as an outer suburban/greenfield site noting its location and setting along the periphery of the existing urban area which will form a natural extension to the existing and granted built environment within a highly accessible location on appropriately zoned lands.

In terms of planning for sustainable neighbourhoods, there is focus on *“planning at the district or neighbourhood scale within larger towns and cities, whether on brownfield or green-field sites”*. The Guidelines state that, *“national policy makes it clear that sustainability is not confined to the physical environment. Sustainability also includes the concept of stable, integrated communities, and planning for such communities must embrace both tangible issues – such as the timely provision of school places – and the intangible, such as people’s perception of what constitutes an attractive, secure environment in which to rear children. Planning objectives at the district / neighbourhood scale can thus be grouped under four main themes:*

- A. *Provision of community facilities;*
- B. *Efficient use of resources;*
- C. *Amenity / quality of life issues; and*
- D. *Conservation of the built and natural environment.”*

The document goes on to state that, *“sustainable neighbourhoods require a range of community facilities, and each district/neighbourhood will need to be considered within its own wider locality, as some facilities may be available in the wider area while others will need to be provided locally”*. It then outlines the importance of the provision of schools, community centres, healthcare facilities and district/neighbourhood centres use to the sustainability of communities. The subject site is located within Belcamp/Balgriffin, immediately adjoining Belmayne and in proximity to the range of services provided within the area as set out in the Community Infrastructure Audit submitted under separate cover. Additionally, the proposed scheme represents an opportunity to create a self-sustaining residential environment with a range of public and commercial facilities to support future residents and the wider community – within the unique setting of Belcamp Hall. Furthermore, the proposed development incorporates provision of a potential school site and high-quality public realm interventions including the Mayne River Greenway, the Town Square and Class 1 Open Space. This constitutes planning at scale to create a sustainable integrated neighbourhood on the lands at Belcamp Hall.

The design of the proposed development has placed considerable emphasis on the context of the site and location as well as the surrounding built environment. The proposed development successfully incorporates the criteria of the *‘Urban Design Manual – A Best Practice Guide’* and its 12 criteria, of which Planning Authorities are recommended to assess planning applications, including: *Context; Connections; Inclusivity; Variety; Efficiency; Distinctiveness; Layout; Public Realm; Adaptability; Privacy/Amenity; Parking; and Detailed Design*. It is evident that the form, layout, architectural and landscaping design of the proposed development have been informed by the development’s place and time. Well-designed homes in the right locations are fundamental to building strong, sustainable communities. Such communities will ensure Ireland’s continued success in attracting and generating investment and improving the quality of life for residents.

In relation to amenity/quality of life issues, *“public open space can have a positive impact on physical and mental well-being as it provides spaces to meet, interact, exercise and relax. It needs to be appropriately designed, properly located and well maintained to encourage its use. It is one of the key elements in defining the quality of the residential environment. Apart from the direct provision of active and passive recreation, it adds to the sense of identity of a neighbourhood, helps create a community spirit, and can improve the image of an area (especially a regeneration area). Well-*

designed open space is even more important in higher density residential developments". The proposed development provides high level of amenity space which utilises the existing natural heritage such as the Mayne River Greenway – a network of pedestrian and cycle routes which connect the parent application, the existing public space networks and Belcamp's landmarks. The protection of exiting trees and hedgerows has been incorporated as part of the Belcamp Green Infrastructure Corridor, which retains the hedgerow trees and drainage ditch along the northern boundary and extends around the perimeter lands. As part of the proposed development 28.3 hectares of public open space has been provided, which includes:

- Mayne River Greenway,
- Belcamp Green Infrastructure Corridor and Biodiversity Loop,
- Town Square,
- Local Green Infrastructure Corridors,
- Local Public Spaces, and
- Class 1 Open space; including playing pitches and changing rooms.

The design of the proposed development has placed considerable emphasis on the context of the site and location as well as the surrounding built environment. The proposed development successfully incorporates the criteria of the 'Urban Design Manual – A Best Practice Guide' and its 12 criteria, of which Planning Authorities are recommended to assess planning applications, including:

1. *Context;*
2. *Connections;*
3. *Inclusivity;*
4. *Variety;*
5. *Efficiency;*
6. *Distinctiveness;*
7. *Layout;*
8. *Public Realm;*
9. *Adaptability;*
10. *Privacy/Amenity;*
11. *Parking; and,*
12. *Detailed Design.*

It is evident that the form, layout, and architectural and landscaping design of the proposed development have been informed by the development's place and time. Well-designed homes in the right locations are fundamental to building strong, sustainable communities. Such communities will ensure Ireland's continued success in attracting and generating investment and improving the quality of life for residents.

Downey are of the considered opinion that the proposed development represents a development that has been carefully and appropriately designed, giving full consideration to its setting neighbouring lands and would integrate successfully with its environs. The proposed development has had regard to the surrounding environment and carefully assesses the proposal in light of same. The development positively contributes to the character and identity of the surrounding vicinity. The proposed scheme is also considered to be of an appropriate density which will help to support the efficient use of

serviceable lands and the existing public transportation. Downey are of the considered opinion that the provision of 2,527 no. residential units (1,780 no. apartments, 473 no. houses, and 274 no. duplex units) with 2 no. childcare facilities would be a positive addition to the surrounding built environment and to the identity of the locality. Furthermore, it is considered that the proposed new homes will meet the aspirations of a range of people and the design and layout of such allows easy access by all. For further detailed information on the proposed development's consistency with the Urban Design Manual, please refer to the Architectural Design Statements prepared by CCK Architects & Urban Designers and Wilson Architecture.

2.9 Delivering Homes, Sustaining Communities Best Practice Guidelines – Quality Homes for Sustainable Communities (2007)

The Department's policy statement 'Delivering Homes, Sustaining Communities' provides the overarching policy framework for an integrated approach to housing and planning. The statement notes that demographic factors will continue to underpin strong demand for housing, which in turn will present considerable challenges for the physical planning of new housing and the provision of associated services. The quality of the housing environment is recognised as being central to creating a sustainable community.

Sustainable neighbourhoods are areas where an efficient use of land, high-quality design and effective integration in the provision of physical and social infrastructure combine to create places people want to live in.

The 'Delivering Homes, Sustaining Communities' policy statement is accompanied by Best Practice Guidelines entitled 'Quality Housing for Sustainable Communities'. The purpose of these Guidelines is to promote high standards in the design and construction and the provision of residential units and services in new housing developments. Best use of land is encouraged and optimal utilisation of services and infrastructure in the provision of new housing; point the way to cost effective options for housing design that go beyond minimum codes and standards; promote higher standards of environmental performance and durability in housing construction; seek to ensure that residents of a new housing scheme enjoy the benefits of first-rate living conditions in a healthy, accessible and visually attractive environment; and provide homes and communities that may be easily managed and maintained.

This Strategic Housing Development application is accompanied by the Architect and Urban Designer's Statement and a Housing Quality Assessment (HQA) prepared by CCK Architects and Wilson Architecture, which demonstrates the proposed development is compliant with the relevant standards in the 'Quality Housing for Sustainable Communities' document, the Fingal County Development Plan 2017-2023 and the Dublin City Development Plan.

2.10 Sustainable Urban Housing Guidance: Design Standards for New Apartments (December 2020)

The Guidelines state that, *"in the longer term to 2040, the Housing Agency has identified a need for at least 45,000 new homes in Ireland's five cities (Dublin, Cork, Limerick, Galway and Waterford), more than 30,000 of which are required in Dublin City and suburbs, which does not include additional pent-*

up demand arising from under-supply of new housing in recent years”. It is also stated that it is “critical to ensure that apartment living is an increasingly attractive and desirable housing option for a range of household types and tenures.”

The Guidelines also state that, “aspects of previous apartment guidance have been amended and new areas addressed in order to:

- enable a mix of apartment types that better reflects contemporary household formation and housing demand patterns and trends, particularly in urban areas;
- make better provision for building refurbishment and small-scale urban infill schemes;
- address the emerging ‘build to rent’ and ‘shared accommodation’ sectors; and
- remove requirements for car-parking in certain circumstances where there are better mobility solutions and to reduce costs.”

Therefore, these Guidelines set out internal space and amenity space standards for apartments; address the emerging ‘build to rent’ and ‘shared accommodation’ sectors and remove car parking requirements at certain locations under certain circumstances. Locations suitable for large-scale high-density apartment developments include ‘Central and/or Accessible Urban Locations’. The Belcamp lands subject to this planning application are served by a high-quality bus corridor connecting Dublin City Centre and Clongriffin Train Station, within close proximity of the subject lands, and as such the lands would be classified as an ‘Accessible Urban Location’ and therefore an appropriate location for the proposed development. The HQAs prepared by CCK Architects & Urban Designers and Wilson Architecture submitted as part of this application outline how the proposed development is consistent with these standards.

The Guidelines also have specific planning policy requirements (SPPRS), which include:

Specific Planning Policy Requirement 1 – *Apartment developments may include up to 50% one-bedroom or studio type units (with no more than 20-25% of the total proposed development as studios) and there shall be no minimum requirement for apartments with three or more bedrooms. Statutory development plans may specify a mix for apartment and other housing developments, but only further to an evidence-based Housing Need and Demand Assessment (HNDA), that has been agreed on an area, county, city or metropolitan area basis and incorporated into the relevant development plan(s).*

In response to this, the proposed development will provide a mix of 31.9% as 1-bed apartments, 50.5% as 2-bed apartments and 17.6% as 3-bed apartments. It is noted that there are no studio apartments proposed. The proposal is therefore consistent with SPPR1 of the Guidelines.

Specific Planning Policy Requirement 3 – *Minimum Apartment Floor Areas:*

- Studio apartment (1 person) 37 sqm
- 1-bedroom apartment (2 persons) 45 sqm
- 2-bedroom apartment (4 persons) 73 sqm
- 3-bedroom apartment (5 persons) 90 sqm

The proposed apartments all meet or exceed the minimum floor areas required under SPPR 3 of the Guidelines and thus is consistent with SPPR 3, which is confirmed in the Housing Quality Assessments

prepared by both Wilson Architects and CCK Architects (the Board are invited to refer to these for full compliance details).

In this regard, the proposed development on the lands at Belcamp Hall (subject to this application) provides for 2,527 no. residential units (473 no. houses, 1,780 no. apartments and 274 no. duplex units), commercial & retail space, 2 no. childcare facility and a total of 2,179 no. car parking spaces, open space and communal open space. The development provides residents with the required level of amenity as outlined within the Guidelines. Downey are of the professional opinion that the proposed development complies with the SPPRs of the '*Sustainable Urban Housing: Design Standards for New Apartments*'.

This SHD application also includes a Housing Quality Assessment and Building Lifecycle prepared by CCK Architects (Fingal Lands) and Wilson Architects (Dublin City Lands), and a detailed Daylight, Sunlight, and Internal Light Analysis Report prepared by Waterman Moylan and submitted in accordance with Chapter 6 of the Guidelines. The proposed development will help to meet the current demand for apartment type developments. For further information in this regard, please refer to the enclosed architectural drawings and detailed Architectural Design Statement, Materials & Finishes Report and Housing Quality Assessment prepared CCK and Wilson Architects, which provide confirmation that the proposed development is consistent with the design standards of these Guidelines.

The Guidelines also note the following with regard to aspect of units under Specific Planning Policy Requirement 4 which states:

"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 33% of dual aspect units will be 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 ensure good street frontage where appropriate.*
- ii. In suburban or intermediate locations, it is an objective that there shall generally be a minimum of 50% dual aspect apartments in a single scheme.*
- iii. 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 33% minimum outlined above on a case-by-case basis, but subject to the achievement of overall high design quality in other aspects."*

Given the unique juxtaposition of the subject site across two administrative areas and over a site extending to c. 67 hectares, it is respectfully submitted that the subject site falls within a Centrally/Accessible location for the DCC lands (i.e., Belcamp south) as it is within close proximity to employment and high capacity public transport services. The more northerly and north westerly part of the lands within Fingal County Council can be considered to be a suburban or intermediate location given it is slightly removed from such employment and has less frequent high-capacity public transport

available. Therefore, the apartments within the Dublin City Council administrative area would require a minimum of 33% of the units to be dual aspect, while the apartments within the Fingal County Council administrative area would require a minimum of 50% of the units to be dual aspect.

The proposed development in this instance is consistent with these requirements as follows:

Fingal Lands:

- Block A and Block B provide for a dual aspect ratio of 87%,
- Block C provides for a dual aspect ratio of 59.25%,
- Block D provides for a dual aspect ratio of 64.26%,
- Block F1 and F2 provides for a dual aspect ratio of 52%,
- Block G provides for a dual aspect ratio of 51%,
- Block H, Block L & Block M provides for a dual aspect ratio of 57%,
- Block J provide for a dual aspect ratio of 60%,
- Block N provides for a dual aspect ratio of 60.7%,
- Block P provides for a dual aspect ratio of 82.6%, and,
- Duplex Block Type 1, Type 2 and Type 3 provides for a dual aspect ratio of 78%.
- Providing an average of 57.38%

Dublin City Lands:

- Block 1 provides for a dual aspect ratio of 55.7%
- Block 2 provides for a dual aspect ratio of 61.3%,
- Block 3 provides for a dual aspect ratio of 46.1%
- Block 4 provides for a dual aspect ratio of 52.6%
- Block 5 provides for a dual aspect ratio of 52.1%,
- Block 6 provides for a dual aspect ratio of 68.1%
- Providing an average of 55.98%

It is important to note also that where there are north facing apartments on the DCC lands, these generally will all face over the large Mayne River Corridor with its large expanse of open space and thus enjoy an excellent aspect and view.

In terms of Children's Play areas, the proposed development has considered the recreational needs of children and incorporates children play equipment as part of the communal amenity space within the scheme. As stated within the Guidelines,

"Children's play needs around the apartment building should be catered for:

- *within the private open space associated with individual apartments;*
- *within small play spaces (about 85-100 sqm) for the specific needs of toddlers and children up to the age of six, with suitable play equipment, seating for parents/guardians, and within sight of the apartment building, in a scheme that includes 25 or more units with two or more bedrooms; and,*
- *within play areas (200-400 sqm) for older children and young teenagers, in a scheme that includes 100 or more apartments with two or more bedrooms."*

The provision of children's play equipment with the proposed development is also consistent with Objective DMS76 of the Fingal County Development Plan 2017-2023, which requires that a minimum of 4sq.m. of play area for every unit and 1Nr piece of equipment per 50sq.m. Therefore, the development will require 5,188 sq.m. of play and recreation areas along with 10 no. pieces of play and recreation equipment, which is being provided as part of this development and indicated within the report by The Big Space.

As such, it is submitted that the proposed development is consistent with the Guidelines in this instance. Please refer to the enclosed landscape drawings and accompanying report prepared by TBS Landscape Architects for further information in this regard.

In relation to bicycle and car parking requirements, the Guidelines state that it must be ensured that, *"new development proposals in central urban and public transport accessible locations and which otherwise feature appropriate reductions in car parking provision are at the same time comprehensively equipped with high quality cycle parking and storage facilities for residents and visitors"*. The proposed development subject to this SHD has provided a total of 5,293 no. bicycle spaces, in high-quality, safe and accessible locations.

As stated within the Guidelines, *"the quantum of car parking or the requirement for any such provision for apartment developments will vary, having regard to the types of location in cities and towns that may be suitable for apartment development, broadly based on proximity and accessibility criteria"*. The proposed development is situated is located on appropriately zoned lands in a highly accessible location within the development boundary of Malahide.

In this regard, the proposed development provides for a total of 2,179 no. car parking spaces and a total of 5,293 no. bicycle spaces, in high quality, safe and accessible locations throughout the scheme. This is considered to be acceptable and in accordance with the requirements of the Guidelines.

2.11 Urban Development and Building Heights Guidelines for Planning Authorities (Dec 2018)

The *"Urban Development and Building Heights, Guidelines for Planning Authorities"* are intended to set out national planning policy guidelines on building heights in relation to urban areas, building from the strategic policy framework set out in the National Planning Framework 2040 (NPF). This document recognises that in recent years local authorities, through the statutory plan processes, have begun to set generic maximum height limits. However, such limits if inflexibly and unreasonably applied, can undermine national policy objectives to provide more compact urban forms as outlined in the National Planning Framework and instead can continue unsustainable patterns of development.

These Guidelines reinforce that, *"a key objective of the NPF is therefore to see that greatly increased levels of residential development in our urban centres and significant increases in the building heights and overall density of development is not only facilitated but actively sought out and brought forward by our planning processes and particularly so at local authority and An Bord Pleanála levels."*

The document states that it is critically important that development plans identify and provide policy support for specific geographic locations or precincts where increased building height is not only desirable but a fundamental policy requirement. Locations with the potential for comprehensive urban development or redevelopment (e.g., brownfield former industrial districts, dockland locations, etc.) should be identified where, for example, a cluster of higher buildings can be accommodated as a new neighbourhood or urban district or precinct.

In light of the above, the guidelines go on to further state that *“newer housing developments outside city and town centres and inner suburbs, i.e. the suburban edges of towns and cities, typically now include town-houses (2-3 storeys), duplexes (3-4 storeys) and apartments (4 storeys upwards). Such developments deliver medium densities, in the range of 35-50 dwellings per hectare net”*.

Section 1.11 of the Guidelines states, *“these guidelines therefore set out national planning policy that:*

- *Expand on the requirements of the National Planning Framework; and*
- *Applies those requirements in setting out relevant planning criteria for considering increased building height in various locations but principally (a) urban and city-centre locations and (b) suburban and wider town locations.”*

The proposed development on the lands at Belcamp Hall, Malahide Road, Dublin 17 is submitted to be in line with the foregoing development policies and with the physical and social infrastructure already in place which can easily accommodate the proposed apartment heights of up to 9 storeys.

The proposed scheme is situated within the wider Belcamp lands and contributes to the completion of the overall developments in the same lands and is considered capable of supporting taller buildings and increased density.

SPPR2: *“In driving general increases in building heights, planning authorities shall also ensure appropriate mixtures of uses, such as housing and commercial or employment development, are provided for in statutory plan policy. Mechanisms such as block delivery sequencing in statutory plans could be utilised to link the provision of new office, commercial, appropriate retail provision and residential accommodation, thereby enabling urban redevelopment to proceed in a way that comprehensively meets contemporary economic and social needs, such as for housing, offices, social and community infrastructure, including leisure facilities.”*

The proposed development seeks to provide for a residential development that is surrounded by a wide range of uses. As part of the scheme, 2 no. childcare facilities are also proposed. There are numerous retails, health, community, and commercial facilities within the vicinity of the subject site, as well as exceptional recreational/leisure amenities including Father Collins Park. A Community and Social Infrastructure Audit has been prepared by Downey, enclosed with this SHD application which provides an overview and assessment of existing social infrastructure and facilities within the locality that ensures compliance with the aforementioned specific planning policy.

SPPR3: *“It is a specific planning policy requirement that where;*

- (A) 1. *An applicant for planning permission sets out how a development proposal complies with the criteria above, and*

2. the assessment of the planning authority concurs, taking account of the wider strategic and national policy parameters set out in the National Planning Framework and these guidelines;

Then the planning authority may approve such development, even where specific objectives of the relevant development plan or local area plan may indicate otherwise.”

It is submitted that this SHD application contains sufficient reports, documentation, plans and justification to support the proposed development and outlines how the development is in accordance with the relevant planning policies and guidelines pertaining to the area. Such documents include architectural plans and elevations, Design Statement (Architects Report), DMURS statements, Traffic Assessment, EIA report, planning reports, and engineering reports. Furthermore, the development is compliant with the specific criteria set out within *Section 3.2* of the Building Height Guidelines which set out development management principles and criteria that proposals for higher buildings are to be assessed against, as follows:

Table 1: Development Management Criteria Assessment for Section 3.2 of the Guidelines

Development Management Criteria in Section 3.2 of the Guidelines:	
At the scale of the relevant city/town	
Criteria of Guidelines	Evaluation and consistency of proposed development
The site is well served by public transport with high capacity, frequent service and good links to other modes of public transport.	The subject site is well served by public transport, particularly Dublin Bus, which provides a QBC route within walking distance of the site. As outlined in Derry O’Leary’s Public Transport Capacity Report, the existing public transport serving the site is both high frequency and has high capacity, such that it can suitably serve the proposed development. Furthermore, the proposed Bus Connects and DART+ will further improve the public transportation offerings. It is anticipated that the BusConnects will be in place prior to the development being constructed. The site is also within approximately 2.5km walking distance of the Clongriffin DART station offering further transportation connections to and from the city centre and beyond. The public transport has the capacity to accommodate the development, as confirmed in Derry O’Leary’s Public Transport Capacity Report (submitted under separate cover). Furthermore, the

	<p>development itself will facilitate improved public transport offerings, such as the future N8 BusConnects Route, which could operate through the site itself. The Board are also referred to Systra's Sustainable Transport Report, which is also submitted under separate cover.</p>
<p>Development proposals incorporating increased building height, including proposals within architecturally sensitive areas, should successfully integrate into/enhance the character and public realm of the area, having regard to topography, its cultural context, setting of key landmarks, protection of key views. Such development proposals shall undertake a landscape and visual assessment by a suitably qualified landscape architect.</p>	<p>The taller buildings are removed from the more sensitive protected structures at Belcamp and have been designed such that views of the structures are retained.</p> <p>It is noted that a full suite of verified photomontages has been prepared by Digital Dimensions and are included as part of the development and a Visual Impact Assessment was carried out by The Big Space as part of the Environmental Impact Assessment Report submitted with the application.</p> <p>There are no sensitive or protected views in the vicinity of the site, which would be affected by the proposed development and taller buildings.</p>
<p>On larger redevelopment sites, proposed developments should make a positive contribution to place-making, incorporating new streets and public spaces, using massing and height to achieve the required densities but with sufficient variety in scale and form to respond to the scale of adjoining developments and create visual interest in the streetscape.</p>	<p>It is noted that there is significant variety in the design approach, which has been achieved in part by the use of two architectural practices (CCK Architects and Wilson Architects) designing different elements of the scheme, albeit in a coherent manner.</p> <p>There is significant variation in height being proposed across the scheme. However, the taller elements of the scheme are within the Dublin City Council administrative area, where the buildings are further removed from the main heritage quarter of the scheme, which is centred around Belcamp Hall and its Walled Garden.</p> <p>The taller buildings within the southern part of the development provide for a strong urban edge along the R139 and thus create a sense of place. There is also improved legibility with</p>

	<p>these taller elements marking out main road connections between the site and the R139.</p> <p>The scheme involves the provision of new streets and connections within the scheme, which can potentially connect to adjoining lands, such as at Northern Cross and to the IDA landbank in the west.</p> <p>Furthermore, the development creates a large area of public open space and a linear park along the Mayne River and Belcamp’s existing lakes and woodlands.</p> <p>The Board are invited to refer to the Design Strategy Overview, which has been prepared by the entire design team to set out the design approach and basis for the proposed development. Also, please refer to the architectural reports and landscape and public realm reports that are submitted under separate cover.</p>
<p>At the scale of the district/neighbourhood/street:</p>	
<p>The proposal responds to its overall natural and built environment and makes a positive contribution to the urban neighbourhood and streetscape.</p>	<p>The proposal for the height in the Dublin City Council administrative area will help to create added visual interest at the R139, which will be supported by the provision of areas of public open space and connections to the riverside public park, which will be accessible to the wider public.</p> <p>The development utilises and integrates with the sites existing built and natural environment, including features such as the Mayne River, Lakes and woodlands, which form part of the overall public open space. The Walled Garden also forms an interesting extension of the proposed Town Square in the northern part of the site.</p> <p>It is respectfully considered that the proposal introduces a high-quality development at an underutilised site within an urban setting, which can act as a catalyst to further development of</p>

	<p>the surrounding lands, particularly the IDA lands to the west.</p>
<p>The proposal is not monolithic and avoids long, uninterrupted walls of building in the form of slab blocks with materials/building fabric well considered.</p>	<p>The increased height will help to create a stronger urban design response to what is essentially an underutilised site, particularly along the R139.</p> <p>The design has been prepared by two different architectural practices, which results in differences in the architectural approach and palette of materials being proposed.</p> <p>The most significant difference is the unit typology between the DCC lands to the south, which are all apartments, and the Fingal lands to the north, which contain a mix of houses, duplex blocks and apartments, noting the greater constraints of the Fingal lands as a result of the existing natural and built heritage of the site. Such constraints the protected structures within the Belcamp lands, including Belcamp Hall along with its Walled Garden and the Washington Monument. There are also protected structures to the immediate north of the site at Belcamp Hutchinson. The northwestern part of the site, where density is lowest may also be considered to be the furthest distance away from public transport and thus less appropriate for higher densities.</p> <p>The proposed design includes an appropriate palette of materials that are sensitive to the overall development and avoids the creation of monolithic blocks.</p>
<p>The proposal enhances the urban design context for public spaces and key thoroughfares and inland waterway/marine frontage, thereby enabling additional height in development form to be favourably considered in terms of enhancing a sense of scale and enclosure while being in line with the requirements of <i>“The Planning System and</i></p>	<p>The site makes use and will enhance the existing Mayne River and lake system as well as woodlands, which are within the Belcamp lands. The main areas of public open space for the Dublin City Council lands will be fronting onto and utilising these existing natural features.</p>

<p><i>Flood Risk Management-Guidelines for Planning Authorities” (2009).</i></p>	<p>The sense of scale created by the taller buildings addressing this open space and natural features is to be welcomed.</p> <p>A site-specific flood risk assessment has been prepared by Waterman Moylan Consulting Engineers and is submitted under separate cover as part of the planning application, which confirms that the site and proposed development is not at risk from flooding.</p>
<p>The proposal makes a positive contribution to the improvement of legibility through the site or wider urban area within which the development is situated and integrates in a cohesive manner.</p>	<p>As previously mentioned, the proposed development provides for a strong streetscape along the R139 Road to the south, which is currently lacking. It will also create new roads connecting the R139 and the Malahide Road (R107), which are indicated on the Development Plan zoning maps for both local authorities. This will improve the legibility of the scheme as a whole. The fact that these major road infrastructural works are to be carried out within Phase 1 ensure that the scheme will be developed in a cohesive manner.</p>
<p>The proposal positively contributes to the mix of uses and/or building/ dwelling typologies available in the neighbourhood.</p>	<p>The development as a whole provides for a mix of unit types including traditional houses, duplexes, apartments as well as childcare facilities, retail and commercial floor space such as restaurants and cafes.</p> <p>There will also be a mix of tenure in the form of Build to Sell (private residential) and some Build to Rent, which will also add to the mix and variety within the development.</p>
<p>At the scale of the site/building</p>	
<p>The form, massing and height of the proposed developments should be carefully modulated so as to maximise access to natural daylight, ventilation and views and minimise overshadowing and loss of light.</p>	<p>The design of the development avoids long and uninterrupted blocks of apartments with a variation in the form and height of the buildings being a central element of the architectural design.</p>
<p>Appropriate and reasonable regard should be taken of quantitative performance approaches to daylight provision outlined in guidelines like the Building Research Establishment’s ‘Site</p>	<p>The proposed development will provide appropriate levels of daylight and sunlight and will not give rise to adverse overshadowing, as</p>

<p><i>Layout Planning for Daylight and Sunlight</i> (2nd Edition) or BS 8206-2:2008 – <i>‘Layout for Buildings – Part 2 Code of Practice for Daylighting’</i>.</p>	<p>confirmed in the report prepared by DKPI for the Dublin City Council administrative part of the site, which is included as part of the application. The results of the assessment by DKPI found that the development is in accordance with the relevant ADF standards, with the 2% standard being applied for kitchen/living/dining rooms. All bedrooms and habitable rooms also achieved the required standard. Initially, 1 room that was tested was found to be marginally below the required standard, but a mitigating design measure of increase the size of the relevant window glazing by a mere 200mm ensured that the unit then met and indeed exceeded the required ADF figure set in the Guidelines.</p>
<p>Where a proposal may not be able to fully meet all the requirements of the daylight provisions above, this must be clearly identified and a rationale for any alternative, compensatory design solutions must be set out, in respect of which the planning authority or An Bord Pleanála should apply their discretion, having regard to local factors including specific site constraints and the balancing of that assessment against the desirability of achieving wider planning objectives. Such objectives might include securing comprehensive urban regeneration and or an effective urban design and streetscape solution.</p>	<p>The development was also found to have no impact on third party lands or properties greater than that recommended in the relevant Guidelines. The Board are invited to refer to the DKPI assessment, submitted under separate cover, for full details.</p>
<p>Specific Assessment</p>	
<p>Specific impact assessment of the micro-climatic effects such as down-draft. Such assessments shall include measures to avoid/mitigate such micro-climatic effects and, where appropriate, shall include an assessment of the cumulative microclimatic effects where taller buildings are clustered.</p>	<p>A wind analysis report has also been prepared by IN2 engineering and submitted under separate cover as part of the application. The analysis from IN2 has helped to inform the design of the scheme. The Board can refer to the IN2 report for details, which found the scheme to be of a high quality in terms of micro-climate.</p>
<p>In development locations in proximity to sensitive bird and / or bat areas, proposed developments need to consider the potential interaction of the building location, building materials and artificial lighting to impact flight lines and/or collision.</p>	<p>Openfield Ecological Services have also prepared an Appropriate Assessment Screening Report and a Natura Impact Statement for the proposed development, which confirms that the development will not give rise to any adverse impacts on any European Site.</p> <p>The development itself will not result in any loss of protected species or their roosts, such as bats or badgers, which was confirmed within the reports prepared by Brian Keeley of Irish</p>

	<p>Wildlife Surveys, which are included under separate cover as part of this application.</p> <p>It is noted that the recommendations of the bat assessment have been taken into account by the design team, including light design and provision of bat boxes as part of the landscape design.</p> <p>In terms of any potential impact on flight lines or bird collisions, it is generally considered that the biggest risk to bird collision is the palette of materials to buildings with curtain glazing being the most serious generator of such risks. In this instance, the design team have chosen a palette of materials that would not give rise to increase bird collision. It is also important to note that the ecologists engaged as part of the design of the proposed development did not record the site as being within any noted bird flight paths. Furthermore, dark corridors are proposed within the development in order to protect birds and bats from artificial lighting. Such locations include along the Mayne River and at the proposed biodiversity Loop around the north and west site boundaries.</p> <p>An Environmental Impact Assessment Report has also been prepared as part of the application and confirms that the proposed development is acceptable from an environmental perspective.</p> <p>The Flood Risk Assessment included with the application also confirms that the development will not give rise to any flood risk either within the site or on third party lands.</p>
<p>An assessment that the proposal allows for the retention of important telecommunication channels, such as microwave links.</p>	<p>There are no telecommunication structures located within the subject site itself.</p> <p>We note that the full extent of any impact that the proposed development may have on existing telecommunication channels would not be fully determined until detailed construction design state or operational phase of the development. It is noted that it is</p>

	<p>standard practice for telecoms operators to reconfigure their equipment where necessary in order to compensate for any potential impact that new buildings may have, which is common in an urban environment.</p> <p>There is sufficient space at roof level of the development to provide for any future telecommunication equipment should the need arise at detailed design stage, in consultation with the relevant telecommunication providers. The Board are invited to refer to the specific report prepared by DKP International on this matter for further details.</p>
<p>An assessment that the proposal maintains safe air navigation.</p>	<p>The proposed height of the development will not affect air navigation. Downey Planning previously engaged with the Irish Aviation Authority and have assessed the height of the proposed buildings and can confirm that they will not impact the Dublin Airport Flight Procedures or Obstacle Limitation Surfaces.</p>
<p>An Urban Design Statement including as appropriate, impact on the historic building environment.</p>	<p>An Urban Design Statement/Architects Statement has been prepared by both Wilson Architects (for the southern part of the Belcamp lands) and CCK Architects (for the northern part of the Belcamp Lands). An overall Design Strategy Overview report has also been prepared by the design team as part of the background and subsequent lodgement of this application. These are all submitted under separate cover as part of the application. This sets out the existing context of the site along with the rationale for design approach and assessment of receiving environment.</p> <p>As part of the EIAR, Courtney Deery also carried out an assessment of the archaeological/heritage environment for the site and the development, while Sheehan & Barry and CORA have assessed the architectural heritage for the site. The Board are invited to refer to these for further details.</p>

Relevant environmental assessment requirements, including SEA, EIA, AA and Ecological Impact Assessment, as appropriate.	As previously noted, the planning application is being submitted along with the necessary Environmental Impact Assessment Report (including biodiversity chapter) and Appropriate Assessment screening report. A bat assessment was also prepared as part of the ecological and biodiversity assessments.
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It is important to emphasise that the height of the development is within the parameters set down in the Fingal County Development Plan and does not rely on these Guidelines to justify its height.

In particular, the proposed development is in accordance with SPPR 4 of the Guidelines, which state that:

SPPR4: *“It is a specific planning policy requirement that in planning the future development of greenfield or edge of city/town locations for housing purposes, planning authorities must secure:*

1. *The minimum densities for such locations set out in the Guidelines issued by the Minister under Section 28 of the Planning and Development Act, 2000 (as amended), titled “Sustainable Residential Development in Urban Areas (2007)” or any amending or replacement Guidelines;*
2. *A greater mix of building heights and typologies in planning for the future development of suburban locations; and*
3. *Avoid mono-type building typologies (e.g. two storey or own-door houses only), particularly, but not exclusively so in any one development of 100 units or more.”*

The proposed development provides for a total of 2,527 no. residential units comprising 1,780 no. apartments (624 no. 1-beds, 990 no. 2-beds, 165 no. 3 beds), 274 no. duplex units (22 no. 1-beds, 40 no. 2-beds, 212 no. 3-bed) and 473 no. houses (16 no. 2-bed, 385 no. 3-beds and 72 no. 4-bed),

This provides for a net density of 66.7 units per hectare for the proposed development, which is in accordance with relevant local and national policy guidelines. Additionally, there is an appropriate mix of housing typologies and heights ranging from 2 storey houses, 3 storey duplex apartments up to 9 storey apartment units. The development is therefore in accordance with SPPR 4 of these Guidelines, keep consistent with the aforementioned Guidelines.

In light of the above, it is considered that the proposed development is consistent with the requirements of these guidelines on building heights for urban developments. The proposed development steps in height from 1 to 9 storeys (across the Fingal and Dublin City lands) with cognisance given to existing built environment in the vicinity of the subject site and the provision of appropriate separation distances. The existing lands at Belcamp are zoned for development and are serviced with road and public transport infrastructure. Therefore, the proposed residential development can be achieved on the lands in accordance with the aforementioned policy guidelines.

2.12 Childcare Facilities: Guidelines for Planning Authorities (2001)

Government policy on childcare is to increase the number of childcare places and facilities available and to improve the quality of childcare services for the community. These Guidelines for Planning Authorities on Childcare Facilities provide a framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and developers and childcare providers in formulating development proposals.

The following definition of Childcare is included in the Guidelines:

“In these Guidelines, “childcare” is taken to mean full day-care and sessional facilities and services for pre-school children and school-going children out of school hours. It includes services involving care, education, and socialisation opportunities for children. Thus services such as pre-schools, naíonraí (Irish language playgroups), day-care services, crèches, playgroups, and after-school groups are encompassed by these Guidelines. Conversely childminding, schools, (primary, secondary and special) and residential centres for children are not covered by these Guidelines.”

For housing schemes, the Guidelines provide a benchmark provision of 1 no. 20 space childcare facility per 75 dwellings. The threshold for provision should be established having regard to existing location of facilities and the emerging demography of the area where new housing is proposed. The recommendations provided within the Guidelines must be considered in the context of the ‘Sustainable Urban Housing: Design Standards for New Apartments’ (2018), which state that:

“Notwithstanding the Department’s Planning Guidelines for Childcare Facilities, which are currently subject to review and recommend the provision of one childcare facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision in apartment scheme should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile for the area.”

As recommended in the Guidelines, 1 no. childcare facility may be required as part of the proposal to cater for the influx of population arising from the proposed scheme. It is worth noting that as stated within the apartment guidelines, *“one-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision and subject to location, this may also apply in part or whole, to units with two or more bedrooms”*.

With respect to the average household size in the area, which stood at 2.8 in Census 2016, and regarding the household size mix, it is suggested that not all the 2-bedroom dwellings are to be family-occupied. To provide for a more accurate estimation, therefore, the 1-bed units and half of the 2-bed units were excluded from the calculations on the basis that these will not be occupied by families, instead these are foreseen to be occupied by young professionals or singles. As such, the proposed development comprises a total of 2,527 no. residential units. When calculating childcare demand, 1-beds and 40% of 2-beds may be excluded from the calculations (646 no. 1-beds + 412 no. as 40% of 2-beds = 1,058 no. units), as such, the proposed development comprises a total of 1,468 no. residential

units which could be potentially family-occupied - and provision is therefore required for c. 501.3 children. This is calculated as follows:

$$(1,880 \div 75) \times 20 = 501.3 \text{ childcare places}$$

The proposed development provides for 2 no. childcare facilities; 1 no. 606.7msq creche in the Fingal County Council development area and 1 no. 500msq creche on the Dublin City Council development area. These childcare facilities are intended to cater for 165 no. children which is 336 spaces below the Guidelines requirement. However, an assessment of the existing childcare facilities indicates an overall maximum potential capacity of 1,112 no. spaces and cumulative demand of 1,131 no. childcare spaces, which is 19 childcare spaces above the actual existing childcare facilities.

A Childcare Assessment Report has been prepared by Downey and has been submitted as part of this application. This provides a detailed assessment of the existing childcare facilities within the subject area, thus assessing the current capacity of the surrounding environs as well as whether the proposed childcare facility would be sufficient to cater for the proposed development. The report confirms that the proposed development generates a requirement of 346 no. childcare spaces with regards to the demographic trends in the area. The proposed childcare facility would provide c. 165 no. childcare spaces to cater for the proposed residential scheme. It is considered that given the demographics of the area within which the subject site is located, as well as the current characteristics and trends as per data from the CSO results and the childcare facilities survey as set out within the report, the construction of 2 no. childcare facility on site is justified in this instance. Please refer to the enclosed report for further details.

In light of the above and noting the provision of a childcare facility within the scheme, it is submitted that the proposed development is consistent with the Childcare Facilities Guidelines.

2.13 Childcare facilities operating under the Early Childhood Care and Education (ECCE) Scheme (Circular Letter: PL 3/2016)

The purpose of this Circular, issued on 31st March 2016, is to revise the Childcare Facilities Guidelines for Planning Authorities 2001, and having regard to the extension of the ECCE scheme and the associated increased demands on childcare facilities with effect from September 2016, planning authorities are hereby requested to:

- Expedite all pre-planning application consultation requests from Childcare facility providers in relation to proposals to extend opening hours, to increase capacity or to provide new facilities.
- Expedite, insofar as is possible, consideration of all planning applications or Section 5 declaration submissions in respect of childcare facilities in order to facilitate the expansion of required capacity as appropriate.

The Childcare Facilities Guidelines for Planning Authorities 2001 outline general planning related standards for childcare facilities. Planning Authorities are advised that the Child Care (Pre-School Services) Regulations 2006 set out a range of childcare related standards for childcare facilities as stipulated by the Department of Children and Youth Affairs. The Child and Family Agency, also known as TUSLA, is responsible for inspecting pre-school services under, and enforcing compliance with, the afore-mentioned 2006 Regulations.

In light of the foregoing, planning authorities are requested to exclude matters relating to childcare facility standards outlined in Appendix 1 of the Childcare Facilities Planning Guidelines 2001 - including the minimum floor area requirements per child - from their consideration of planning applications relating to childcare facilities and to solely focus on planning related considerations that fall within the remit of the Planning and Development Act 2000, as amended, in the determination of such planning applications.

It is submitted that the scheme will bring forward new childcare facilities at central locations within the subject site, providing for full accessibility to future residents. The childcare facilities would also benefit from the adjacent main public open space to the north, which will be activated by the activity of the childcare facility and can be used as a complementary outdoor space, in addition to its own playground. The neighbouring apartments and duplex blocks will also enhance activity within the surrounding public realm, which would also contribute positively to achieve a safe and dynamic bounding public realm for the creche.

It is submitted that the no. 2 proposed childcare facilities provides for adequate capacity to cater for the influx of population arising from the proposed development. Therefore, it is suggested that the proposed development is consistent with Circular PL 3/2016.

2.14 Smarter Travel: A Sustainable Transport Future

In summary, *'Smarter Travel: A Sustainable Transport Future'* states that, *"to achieve the vision of a sustainable transport system, individual lifestyles will have to change and collectively we will have to work progressively on a range of solutions which deal with apparently conflicting goals: economic growth, reduced emissions, less use of motorised transport and better accessibility."*

The 5 key goals of this transport policy are as follows:

- *Improve quality of life and accessibility to transport for all and, in particular, for people with reduced mobility and those who may experience isolation due to lack of transport;*
- *Improve economic competitiveness through maximising the efficiency of the transport system and alleviating congestion and infrastructural bottlenecks;*
- *Minimise the negative impacts of transport on the local and global environment through reducing localised air pollutants and greenhouse gas emissions;*
- *Reduce overall travel demand and commuting distances travelled by the private car; and,*
- *Improve security of energy supply by reducing dependency on imported fossil fuels.*

It is considered that the proposed development complies with *"Smarter Travel: A Sustainable Transport Future"*.

The subject site is strategically located within cycling distance of the Clongriffin Train Station and is serviced by a frequent bus service at the R107 Malahide Road. The proposed development is to provide considerable secure, covered bicycle parking for future residents and visitors, particularly to residents of the apartment blocks, where it will encourage use of sustainable modes of transportation. Therefore, it is considered that the proposed development is consistent with this national transport

policy and will assist in its implementation. The Board are invited to refer to the Traffic and Transport Assessment prepared by Waterman Moylan and the Sustainable Transport Strategy prepared by Systra which have been submitted as part of this application.

2.15 Design Manual for Urban Roads and Streets (DMURS) (2013)

The '*Design Manual for Urban Roads and Streets*' (DMURS) 2013 and as updated in 2019, sets out design guidance and standards for constructing new and reconfigured existing urban roads and streets. It also sets out practical design measures to encourage more sustainable travel patterns in urban areas. The DMURS Report and Statement of Design Consistency, prepared by Waterman Moylan Engineering Consultants, confirms that the proposed development is consistent with DMURS. Please refer to the pertaining documents prepared by Waterman Moylan Engineering Consultants for further information in this regard.

2.16 Retail Planning Guidelines (2012) and Retail Design Manual (2012)

The Retail Planning Guidelines, which were first issued in 2000 and subsequently revised in 2005, and subsequently the third iteration of the Guidelines were published in 2012 accompanied by the Retail Design Manual (2012), providing the strategic policy framework for the spatial distribution of new retail development. Therefore, the Guidelines provide a comprehensive framework to guide both local authorities in preparing development plans and assessing applications for planning permission, and retailers and developers in formulating development proposals.

The guidelines specifically state that local retail units such as corner shops or shops located in local or neighbourhood centres serving local residential districts perform an important function in urban areas. Where a planning authority can substantiate the local importance of such units in defined local centres, they should safeguard them in development plans, through appropriate land-use zoning. Development management decisions should support the provision of such units, particularly where they encompass both food-stores and important non-food outlets such as retail pharmacies, and have significant social and economic functions in improving access to local facilities especially for the elderly and persons with mobility impairments, families with small children, and those without access to private transport. The guidelines identify five key objectives, of equal weight, which are as follows:

- to ensure that in future all Development Plans incorporate clear policies and proposals for retail development,
- to facilitate a competitive and healthy environment for the retail industry of the future,
- to promote forms of development which are easily accessible, particularly by public transport and in a location which encourages multi-purpose shopping, business and leisure trips,
- to support the continuing role of town and district centres, with
- a presumption against large retail centres located adjacent or close to existing, new or planned national roads/motorways.

The Guidelines clearly acknowledge that it is critical for the proper planning and sustainable development of an area that new retail development is located at the optimum location having regard to the type of retail offering and the context of the existing environs. It is submitted that the proposed scheme comprised of the following:

Breakdown of Commercial/Retail Provision within the Scheme

Block	Description	GFA (sqm)
Block D	Café/Restaurant/7 no. Retail Units (Ranging from 55 sqm to 132.5 sqm)	1,020.5
Block F	Café/Restaurant/ 5 no. Retail Units (Ranging from 152 sqm to 208 sqm)	1,162
Block G	A Retail Unit	140
Block J	4 no. Retail Units (Ranging from 91.3 sqm to 144.7 sqm)	472
Creche	Childcare	606.7
Clubhouse	Changing Rooms	97
FCC Sub-total		3,498.2
Block 3	Café/Retail	417.8
Block 3	Creche	508
DCC Sub-total		925.8
Total Retail/Commercial Provision		4,424

2.17 National Cycle Manual (June 2011)

The 'National Cycle Manual' 2011 embraces the Principles of Sustainable Safety as this will offer a safe traffic environment for all road users including cyclists. It offers guidance on integrating the bike in the design of urban areas. The Manual challenges planners and engineers to incorporate cycling within transport networks more proactively than before.

Outlined in the Manual, many residential and access streets already offer a high quality of service to cycling. Cycling two-abreast on quiet, interesting, well-surfaced streets and roads can be attractive to cyclists. In many cases there is no physical infrastructure involved, other than the self-evident and self-enforcing nature of the environment.

The Manual also gives guidance on the minimum number of spaces which should be provided initially at new private and public facilities in urban areas. For housing developments, this is stated to be:

- 1 no. private secure bicycle space per bed space (note - design should not require bicycle access via living area), minimum 2 spaces; and
- 1 visitor bicycle space per two housing units.

The following gives an overview of the varying characteristics of parking at residential areas that should be considered in determining the most appropriate parking facility.

- Convenience is essential for frequently used bicycles, and preferably not via living areas;
- Private parking should accommodate residents and visitors; and,
- Shared parking facilities can be suitable for multiple dwellings (e.g. apartment complex).

It is submitted that connections in the proposed development have been addressed by developing an integrated site strategy having full regard to cycle and pedestrian movement, in addition to efficient vehicular access points, including:

- The proposed development will include dedicated cycle facilities, including an off-road cycle track along the East-West Link Road and along the R139, separated from the vehicular carriageway by a verge. The proposed junction upgrade at the site entrance from Malahide Road includes new cycle stopping areas and new cycle lanes along the Malahide Road.
- Due consideration has been given to creating pedestrian & cycle links between Belcamp's natural & built heritages amenity including – Belcamp Hall, the Walled Garden, the Greenway Walk and the lakes.
- The proposed development provides sufficient, accessible and safe bicycle parking for residents & visitors. The secure bicycle spaces do not require access via living areas.

For further details on the cycle infrastructure proposed, please refer to the enclosed Traffic and Transport drawings and documentation prepared by Waterman Moylan Engineering Consultants for further details in this regard.

2.18 EIA Directive

The EIA Directive 85/337 EEC, as amended, is the key legislation in EU Environmental Policy. The EIA Directive aims to determine the likely significant effects of a project on the environment. Screening is the first stage in the EIA process required by Article 4 of the EIA Directive and this process determines whether an EIA is required for a specific project. The Directive outlines in Article 4(1) 24 Annex 1 projects that require a mandatory EIA. Article 4 (2) outlines Annex 2 projects that require consideration for EIA further to a case-by-case examination or through thresholds and criteria set out by Member States. In an Irish context, projects requiring a mandatory EIA or consideration for EIA further to a case-by-case examination or thresholds are listed in Schedule 5 of the Planning and Development Regulations.

Development projects requiring an Environmental Impact Assessment Report (EIAR) are set out in Schedule Five of the Planning and Development Regulations, 2001 (as amended). Part 1 of this schedule lists those projects that require a mandatory EIA irrespective of size in any EU Member State whereas Part II identifies the threshold limits for projects that require a mandatory EIA in Ireland. Article 10(b) (i) of Part II 'Infrastructure Projects' indicates that an EIA is required for the construction of more than 500 dwellings.

Another threshold is the size of the development site and in this regard, Article 10(b)(iv) requires that an EIAR be prepared for urban developments which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.

In this instance, given the nature of the lands with ecological and fluvial sensitivities, that 2,527 no. units are proposed and indeed noting that the application site extends to c. 67.6 hectares within what can be considered a built-up area, an Environmental Impact Assessment (EIAR) Report has been prepared undertaken as part of the proposed application. Please refer to the enclosed EIAR which

assesses the overall development and is enclosed with this SHD application for the consideration of the Board.

2.19 Bird and Habitats Directive - Appropriate Assessment

The proposed development has been screened for Appropriate Assessment in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/32/EEC). OPENFIELD Ecological Services has prepared a report for Screening for Appropriate Assessment for the proposed development. The screening report has evaluated the proposed development at Malahide to determine whether or not significant negative impacts on Natura 2000 sites are likely to arise by virtue of its construction and use.

The screening report concludes that

“On the basis of the screening exercise carried out above, it can be concluded, on the basis of the best scientific knowledge available, that the possibility of any significant effects on European Sites, other than Baldoyle Bay SAC and Baldoyle Bay SPA, whether arising from the project itself or in combination with other plans and projects, can be excluded.

Direct hydrological pathways exist to Baldoyle Bay; significant effects cannot be ruled out to the following areas:

- *Baldoyle Bay SAC and Baldoyle Bay SPA*

The potential for large quantities of sediment to be washed into the Bay, due to the proximity of works to the Mayne River, as well as the potential for the spread of Giant Hogweed, an alien invasive species, and surface water run-off in the absence of SUDS means that significant effects to habitats within the SAC, and species within the SPA, cannot be ruled out at this stage.

Significant effects are not likely to occur to any other Natura 2000 site”.

Accordingly, a Natura Impact Statement (NIS) has been prepared by OPENFIELD Ecological Services for the proposed development. The NIS contains an analysis of the proposed project and its relationship with areas designated under the Habitats and Birds Directives. Pathways exist between the development site and two such areas and these have been described in detail. Following this analysis, it is concluded that

“A pathway exists (the River Mayne) between the development site and two such areas and these have been described in detail. Following this analysis, it is concluded that significant effects to the Baldoyle Bay SPA/SAC could not be ruled out. Specifically, this may arise from the impact to intertidal habitats from pollution during the construction phase, pollution during the operation phase and the potential for contamination by Giant Hogweed, an alien invasive species. Arising from this assessment, mitigation measures have been proposed.

With the implementation of these mitigation measures, it can be concluded beyond any reasonable scientific doubt, that the proposed development either alone or in-combination with other plans or projects, will not adversely affect (either directly or indirectly) the integrity any European site. This conclusion is based on best scientific knowledge”.

For further information in this regard, please refer to the Appropriate Assessment Screening Report and Natura Impact Statement prepared by OPENFIELD Ecological Services. It is also noted that Brian Keeley B.Sc. has undertaken a Mammal Survey including bats, badgers and otters of the site which are included as part of this planning application to An Bord Pleanála.

2.20 The Planning System and Flood Risk Guidelines (2009)

These Guidelines require the planning system at all levels to avoid developments in areas at risk of flooding, particularly floodplains, except where there are no suitable alternative sites available in areas at lower risk that are consistent with the objectives of proper planning and sustainable development. Where such development has to take place, in the case of urban regeneration for example, the type of development has to be carefully considered and the risks should be mitigated and managed through location, layout and design of the development to reduce flood risk to an acceptable level. Applicants are advised to carefully examine their development proposals to ensure consistency with the requirements of these Guidelines including carefully researching whether there have been instances of flooding or there is the potential for flooding on specific sites and to carry out a site-specific flood risk assessment.

In accordance with these Guidelines, Waterman Moylan Consulting Engineers have carried out a flood risk assessment of the subject site. The site has been assessed in accordance with the Flood Risk Management Guidelines, with appropriate mitigation measures proposed such as SuDs design, green roofs, appropriate floor levels, and regular inspections. Therefore, it is considered that the proposed development is consistent with the requirements of this national flood risk management policy. For further information in this regard, please refer to the Flood Risk Assessment report prepared by Waterman Moylan Consulting Engineers which accompanies this application.

2.21 All-Ireland Pollinator Plan 2021-2025

The All-Ireland Pollinator Plan is a shared plan of action which is to bring about a landscape where pollinators can flourish over 2021-2025. To achieve this, the Plan sets out six objectives: (1) Making farmland pollinator friendly, (2) Making public land pollinator friendly, (3) Making private land pollinator friendly, (4) All-Ireland Honeybee Strategy, (5) Conserving rare pollinators, and (6) Strategic coordination of the Plan.

With respect to the aforementioned, the proposed development has taken into consideration the All-Ireland Pollinator Plan, reflecting the relevant guidelines and proposed measures by providing for an internal network of landscaped open spaces. Moreover, these high-quality landscaped areas retain the existing trees and hedgerows where possible, which will enhance the scheme by providing mature sylvan areas as a foil to the new streetscapes and buildings now proposed. Please refer to the Landscape drawings and report prepared by TBS landscape Architects for further details on inclusion of the Plan guidelines within the proposed landscape of the scheme.

2.22 National Adaption Framework: Planning for a Climate Resilient Ireland

In accordance with the *'Climate Action and Low Carbon Development Act 2015'*, this National Adaptation Framework (NAF) specifies the national strategy for the application of adaptation measures in different sectors and by local authorities in their administrative areas in order to reduce the vulnerability of the State to the negative effects of climate change and to avail of any positive effects that may occur. This NAF and its successors will set out the context to ensure local authorities, regions and key sectors can assess the key risks and vulnerabilities of climate change, implement climate resilience actions and ensure climate adaptation considerations are mainstreamed into all local, regional and national policy making.

The *'Built Environment and Spatial Planning'* section within this Framework recognises that, *"climate change considerations need to be taken into account as a matter of course in planning-related decision making processes and that the deepening of adaptation considerations in the planning and building standards processes is considered the most appropriate way of increasing the resilience of the built environment"*.

Furthermore, *"effective planning reduces vulnerability to the negative effects of climate change by integrating climate considerations into decision making in order to avoid inappropriate forms of development in vulnerable areas and promoting compact development in less vulnerable areas"*. It is important to mention that this Framework envisions *'flood resilience'* and *'access to wildlife and green space'* as no-regret benefits of effective adaptation which would continue to be worthwhile regardless of future climate scenarios.

As such, the proposed development has taken into consideration the context of the site and it can be noted that an assessment of Flood Risk has been prepared by Waterman Moylan Consulting Engineers, with appropriate mitigation measures proposed such as SuDS design attenuation ponds, overland flood routing, etc. Thus, the proposed development with access to high-quality green communal space and introduction of best practice energy efficiency measures as required to meet the Energy Strategy and Building Regulations and promoting a compact urban form for *'less vulnerable areas'* is consistent with this national framework.

2.23 Climate Action Plan 2021

Climate disruption is already having diverse and wide-ranging impacts on Ireland's environment, society, economic and natural resources. The Climate Action Plan 2021 sets out an ambitious course of action over the coming years to address this issue. The Plan clearly identifies the nature and scale of the challenge.

It outlines the current state of play across key sectors including Electricity, Transport, Built Environment, Industry and Agriculture and charts a course towards ambitious decarbonisation targets. The Plan sets out governance arrangements including carbon-proofing policies, establishment of carbon budgets, a strengthened Climate Change Advisory Council and greater accountability to the Oireachtas.

The Plan clearly recognises that Ireland must significantly step up its commitments to tackle climate disruption. The leadership role both the Government and public bodies can play in taking early action

on climate is fundamental to achieving our decarbonisation goals. The Plan notes that the built environment (residential and commercial) accounted for 12.7% of Ireland’s greenhouse gases in 2018; an increase from 11.7% in 2017. It is important that we improve the energy efficiency of our buildings, including our homes, workplaces, and schools by meeting higher energy performance standards and by increasing retrofit activity. This will not only reduce Ireland’s dependence on fossil fuels, but will also improve our living standards by making our buildings more comfortable, healthier, safer, and less costly to heat.

Our buildings are 70% reliant on fossil fuels, including oil fired boilers; over 80% of our homes and other buildings assessed for their BER have a rating of C or worse; and the current annual retrofit activity for existing stock is far too limited (approximately 23,000, mainly shallow, retrofits). A hierarchy of the most cost-effective investments underpin this, in addition to those already committed to in the 2019 Climate Action Plan, including:

- Improving the fabric and energy efficiency of our existing buildings.
- Rolling out zero-carbon heating solutions, predominantly heat pumps and district heating networks
- Planning for the full phase out of fossil fuels in buildings by 2050
- Progressive strengthening of building standards for all types of buildings
- Promoting the use of lower carbon alternatives in construction.
- Promoting behavioural change in how households use energy.

The proposed buildings are to be of a high energy rating and in full compliance with the relevant Guidelines. An Energy Statement has been prepared under separate cover, which details this. As such, the proposed development has taken into consideration the Climate Action Plan and measures have been included within the design of the development to reduce carbon emissions in line with the requirements of the Action Plan.

2.24 Architectural Heritage Protection Guidelines for Planning Authorities

These guidelines are issued under Section 28 and Section 52 of the Planning and Development Act 2000. Under Section 52 (1), the Minister is obliged to issue guidelines to planning authorities concerning development objectives: a) for protecting structures, or parts of structures, which are of special architectural, historical, archaeological, artistic, cultural, scientific, social, or technical interest, and b) for preserving the character of architectural conservation areas.

The Guidelines note that as indicated in the 2001 Regulations, a planning application for works to a protected structure or proposed protected structure must include (in addition to the normal requirements to supply maps and drawings) “such photographs, plans and other particulars as are necessary to show how the development would affect the character of the structure.”

Belcamp Hall is designated as Protected Structure No. 0463, this status includes 18th century original house, Washington Monument, walled garden, bridge & early 20th century chapel. As part of the development there are no works proposed for Belcamp Hall, however the following is proposed:

- Undertake works to the Washington Monument to preserve the character of the structure and prevent deterioration.

- The proposed development includes the restoration of the Mayne River and bridge. It is proposed that the woodland and Mayne River valley will form a significant new public amenity within the area, incorporating woodland walks within the Belcamp lands.
- It is the intention to conserve the icehouse as part of the overall conservation of the house and grounds.

In order to assist the Board and the Planning Authority in assessing the proposals for the Protected Structures, Sheehan & Barry Conservation Architects have prepared a comprehensive Architectural Assessment/ Conservation Report, which includes an architectural assessment, impact assessment and conservation and Methodology assessment with a photographic survey and fully detailed existing and proposed drawings with regards to the preservation of Belcamp Hall. As well plans and proposals for the landmark features on the Belcamp Lands including the icehouse, the Washington Tower and the lakes, causeway and weirs.

Please refer to the documentation prepared by Sheehan & Barry Conservation Architects for further details.

3.0 REGIONAL POLICY AND GUIDELINES

The key provisions of the regional planning policy as it relates to the proposed development are now set out in the following sections. The key regional policy of relevance includes:

- Regional Planning Guidelines for the Eastern & Midland Region 2019-2031; and,
- Transport Strategy for the Greater Dublin Area 2016-2035.

3.1 Regional Spatial & Economic Strategy for the Eastern & Midland Region

The '*Regional Spatial and Economic Strategy*' (RSES) was published by the Eastern and Midland Regional Assembly. The RSES outlines the long-term regional level strategic planning and economic framework in support of the National Planning Framework for the period 2019-2031.

The RSES identifies regional assets, opportunities, pressures and constraints and provides a framework for investment to better manage spatial planning and economic development throughout the Eastern & Midland Region. The RSES is tasked with the development of planning policy for future housing needs in the region upon consideration of the availability of land, resources, environment and infrastructure capacity.

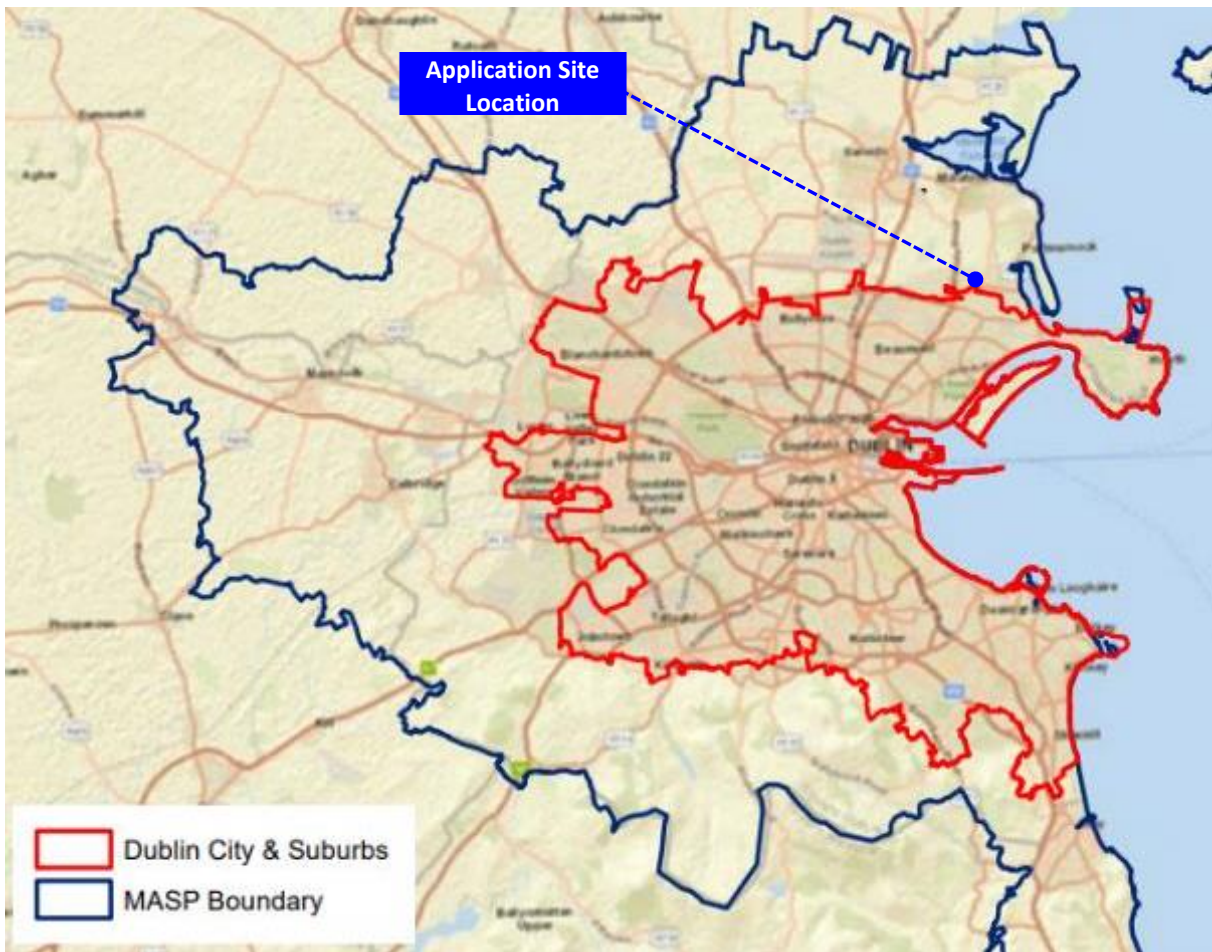


Figure 1: Application Site Location within the Dublin Metropolitan Area Strategic Plan' (MASP) Area under the Regional Spatial and Economic Strategy (Eastern & Midland Regional Assembly)

In conjunction with the NPF, the RSES predicts the Dublin Metropolitan Area under 'Dublin Metropolitan Area Strategic Plan' (MASP) to experience continued population growth over the period 2019-2031 with a predicted increase of 250,000. The NPF targets 50% of all housing to be provided within or contiguous to the built-up area of Dublin city and suburbs and a target of at least 30% for other metropolitan settlements, with a focus on healthy placemaking and improved quality of life. In order to combat and provide for compact residential development, the RSES outlines a number of key Regional Policy Objectives that pertain to the NPF targets. The key Regional Policy Objectives applicable to the development proposal are the following:

Regional Policy Objective (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 projects.”

Regional Policy Objective (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’.”

Regional Policy Objective (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 RSES seek to deliver strategic development areas identified in the MASP, located within existing settlement development boundaries including locations where there an excellent provision of public transport services. The proposed development at on the Belcamp Hall lands will provide for a sustainable residential development on appropriately zoned lands, in a highly accessible location within the development boundary of Belcamp/Balgriffin which promotes compact urban growth and a good quality of life. It is submitted that the provision of a high quality and medium density residential development (66.7 units per hectare) consisting of 2527 no. residential units (473 no. houses, 1780 no. apartments and 274 no. duplex units) with 2 no. childcare facility will assist in achieving the aforementioned objectives and it also complies with the pertaining policies and standards. For further details on how the proposed development is in accordance with these policies, please refer to the Housing Quality Assessments and Architectural Design Statements prepared by CCK Architects & Wilson Architects which is included as part of the architectural planning packs.

In relation to Settlement Strategies, Regional Policy Objectives (RPO) 4.1 and 4.2 of the RSES set out the rationale and basis for preparing these strategies. RPO 4.1 states:

“In preparing Core Strategies for development Plans, Local Authorities shall determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements in the RSES, within the population projections set out in the National Planning Framework to ensure that towns grow at a sustainable and appropriate level, by setting out a rationale for land proposed to be zoned for residential, employment and mixed-use development across the Region. Core strategies shall also be developed having regard to the infill/brownfield targets set out in the National Planning Framework, National Policy Objectives 3a-3c.”

RPO 4.2 states:

“Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.”

It is submitted that the proposed development on appropriately zoned lands will adhere with the policies and objectives of the Regional Spatial and Economic Strategy for the Eastern & Midland Regional Assembly area and will contribute to providing additional housing units within the existing envelop of Dublin Metropolitan Area.

3.2 Transport Strategy for the Greater Dublin Area 2016-2035

This transport strategy provides a framework for the planning and delivery of transport infrastructure and services in the Greater Dublin Area (GDA). The purpose of the Strategy is:

“To contribute to the economic, social and cultural progress of the Greater Dublin Area by providing for the efficient, effective and sustainable movement of people and goods.”

The core of the strategy seeks the better integration of land use planning and transport planning. This can be achieved through the consolidation of development into higher order centres. In terms of the provision of housing, the strategy seeks to directly enable the sustainable development of strategically important residential sites, particularly in Metropolitan Dublin, where demand is highest.

The proposed development on lands at Belcamp Hall, seeks to develop on appropriately zoned lands, in a highly accessible location within the Belcamp, Balgriffin & Clongriffin area. The application site is also located within walking distance of Dublin Bus stops located along R107 Malahide Road to the east of the application site. Additionally, the site is located approximately 2.7km for the Clongriffin Train Station. It is considered that the proposed application will represent an appropriate form of development in the context of supporting the vision and objectives of the Transport Strategy for the Greater Dublin Area 2016-2035.

4.0 LOCAL PLANNING POLICY

This section of the report provides an account of the relevant local planning policy framework pertaining to the application site and proposed development, all of which is contained within the Fingal County Development Plan 2017-2023 & the Dublin City Development Plan 2016-2022.

4.1 Dublin City Development Plan 2016-2022

4.1.1 Overarching Considerations

The subject site is located within the functional area of Dublin City Council. The development of the site is therefore informed by the policies and objectives of Dublin City Development Plan. The policies and objectives of the Development Plan are underpinned by the following statement:

“For the purposes of guiding this plan, both the long-term vision and the core strategy, as set out above, can be translated into three strongly interwoven strands:

- 1. Compact, Quality, Green, Connected City*
- 2. A Prosperous, Enterprising, Creative City*
- 3. Creating Sustainable Neighbourhoods and Communities*

The core strategy will guide development in both policy and spatial terms. Delivered together, these priorities represent an integrated and holistic approach to the delivery of essential infrastructure and services within an over-arching sustainable framework.”

4.1.2 Core Strategy & Housing Strategy

The purpose of the Core Strategy is to articulate a medium-to-longer term quantitatively based strategy for the spatial development of the area of the Planning Authority and in doing so, to demonstrate that a Development Plan and its policies and objectives are entirely consistent with national and regional policies and strategies.

The North Fringe lands (Clongriffin-Belmayne) have been identified as a Strategic Development and Regeneration Area (SDRA). *“The north fringe action area plan was first produced for the North Fringe lands in 2000, setting out the objective to extend the metropolitan core and create a new dynamic mixed-use urban quarter.”*

The vision of the Dublin City Development Plan is to grow Dublin in a sustainable fashion as it enters a period of sustained economic and population growth. *“Dublin city in its entirety lies within the metropolitan area and the RPGs give direction to Dublin city as the ‘gateway core’ for high-intensity clusters, brownfield development, urban renewal and regeneration”*. Significant housing demand exists in the Dublin city area and several Strategic Development and Regeneration Areas (SDRAs) have been identified to try and meet this demand; the proposed development is located within an SDRA (SDRA 1 North Fringe Clongriffin-Belmayne).

Further to this, the plan states that, *“a further key aspect is that future expansion, whether housing or mixed-uses, occur in tandem with high-quality rail-based public transport and on a phased basis. The development plan incorporates these principles in a settlement hierarchy which prioritises the inner city, key district centres and strategic development and regeneration areas (SDRAs).”*

The site in question is part of a SDRA and is located within close proximity to Clongriffin Train Station, as well as the Malahide Road QBC, ensuring development of these lands is consistent with development plan policy. The Development Plan estimates that 7,100 residential units can be produced within the SDRA 1 (Fig. 1). The overall proposed development provides for a total of 2,527 no. residential units (of which 1,230 no. units are within the functional area of Dublin City Council) and is considered consistent with the objectives of the Development Plan.

Table E – Capacity of Sub-areas of the City for Residential Development.

		Estimated Capacity – Number of Residential Units
	Inner City Area (excluding SDRA 7, SDRA 18, and SDRAs 10–16 inclusive)	8,900
SDRA 1	North Fringe (including Clongriffin/Belmayne)	7,100
SDRA 2	Ballymun	3,000
SDRA 3	Ashtown/Pelletstown	1,000
SDRA 4	Park West/Cherry Orchard	2,000
SDRA 5	Naas Road lands	2,100
SDRA 6	Docklands (including SDZ area and Poolbeg West)	4,600
SDRA 7	Heuston Station and Environs	1,200
SDRA 8	Grangegorman and Environs	800
SDRA 9	St Michael's Estate	500
SDRA 10	Dominick Street	200
SDRA 11	O'Devaney Gardens	1,000
SDRA 12	St Teresa's Gardens	800–1,000
SDRA 13	Dolphin House	600
SDRA 14	Croke Villas and Environs	100
SDRA 15	St James's Medical Campus and Environs	500
SDRA 16	Liberties (including Newmarket and Digital Hub)	2,500
SDRA 17	Oscar Traynor Road	650–700
SDRA 18	National Concert Hall	350–400
	Rest of City	14,400
	Total	52,300–52,600

Figure 2: Dublin City Council Capacity of Sub-areas of the City for Residential Development

In relation to the housing strategy for the city, there are several policies and objectives for the delivery of housing, however there are three core principles that inform and guide the overall core strategy which are as follows:

- 1. To ensure the provision of good quality housing across owner-occupied and rental housing tenures in sustainable communities,*
- 2. To ensure the planning and building of housing and residential space in the city contributes to sustainable and balanced development, and*
- 3. To ensure adequate provision of social rental housing for households unable to afford housing from their own resources.*

It is submitted that the proposed development at Belcamp is consistent with the housing strategy as it will assist in the delivery of housing, of a sustainable density, within the city, whilst providing a variety of unit types and mixed tenures for all, in a high-quality, vibrant community setting.

4.1.3 Quality Housing

In conjunction with the housing strategy, the Quality Housing chapter identifies the minimum standards required by Dublin City Council in relation to housing supply in the city area. At a general level, the development plan states that, *“the Department of Housing, Planning, Community and Local Government Planning Policy Statement 2015 encourages planning authorities to engage in active land management by leading and managing the development process and ensuring that land zoned for development actually comes into use in accordance with development plan policy and in tandem with supporting infrastructure.”*

It continues, *“building at higher densities makes more efficient use of land and energy resources, creating a consolidated urban form which fosters the development of compact neighbourhoods and a critical mass which contributes to the viability of economic, social, and transport infrastructure.”*

The proposed development at Belcamp is consistent with these broad level policy objectives, which include:

QH5: *“To promote residential development addressing any shortfall in housing provision through active land management and a coordinated planned approach to developing appropriately zoned lands at key locations including regeneration areas, vacant sites and under-utilised sites.”*

QH6: *“To encourage and foster the creation of attractive mixed-use sustainable neighbourhoods which contain a variety of housing types and tenures with supporting community facilities, public realm and residential amenities, and which are socially mixed in order to achieve a socially inclusive city.”*

QH7: *“To promote residential development at sustainable urban densities throughout the city in accordance with the core strategy, having regard to the need for high standards of urban design and architecture and to successfully integrate with the character of the surrounding area.”*

The Development Plan recognises the importance of building sustainable communities and on this basis, it is submitted that the proposed development at Belcamp is consistent with these policies.

In relation to apartment living, the Development Plan states that, *“it is envisaged that the majority of new housing in the city area will be apartments or another typology that facilitates living at sustainable urban densities. Successful apartment living requires that the scheme must be designed as an integral part of the neighbourhood.”*

QH18: *“To promote the provision of high quality apartments within sustainable neighbourhoods by achieving suitable levels of amenity within individual apartments, and within each apartment development, and ensuring that suitable social infrastructure and other support facilities are available in the neighbourhood, in accordance with the standards for residential accommodation.”*

QH19: *“To promote the optimum quality and supply of apartments for a range of needs and aspirations, including households with children, in attractive, sustainable, mixed-*

income, mixed-use neighbourhoods supported by appropriate social and other infrastructure.”

QH20: *“To ensure apartment developments on City Council sites are models of international best practice and deliver the highest quality energy efficient apartments with all the necessary infrastructure where a need is identified, to include community hubs, sports and recreational green open spaces and public parks and suitable shops contributing to the creation of attractive, sustainable, mixed-use and mixed-income neighbourhoods.”*

Downey are of the professional opinion that the proposed development at Belcamp is consistent with these policies and will further support future residential developments in the area given the quantum, variety and quality of residential units. Please refer to the enclosed architectural drawings, detailed Housing Quality Assessment and Architectural Design Statement prepared by Wilson Architecture, which provide confirmation that the proposed development is consistent with the design standards and policies of the pertaining Development Plan.

4.1.4 Sustainable Neighbourhoods and Communities

In terms of Sustainable Communities and Urban Design in residential developments, the Development Plan states that:

A Good Urban Neighbourhood: *“The urban neighbourhood in Dublin should be big enough to support a range of services and small enough to foster a sense of belonging and community; it should be sufficiently dense to enable all of its essential facilities to be within easy walking distance of the urban centre.”*

Objectives include:

SN1: *“To promote good urban neighbourhoods throughout the city which are well designed, safe and suitable for a variety of age groups and tenures, which are robust, adaptable, well served by local facilities and public transport, and which contribute to the structure and identity of the city, consistent with standards set out in this plan.”*

SN2: *“To promote neighbourhood developments which build on local character as expressed in historic activities, buildings, materials, housing types or local landscape in order to harmonise with and further develop the unique character of these places.”*

Neighbourhoods and Supporting Infrastructure: *“The importance of supporting infrastructure to underpin successful neighbourhoods and sustainable communities is now a long established and central tenet of government policy”. “A range of community facilities and infrastructure will be essential to support the emergence of sustainable neighbourhoods and communities throughout the city, especially in newly emerging or developing areas”.* Development Plan policy objectives include:

SN5: *“To ensure that applications for significant large new developments (over 50 units) are accompanied by a social audit and an implementation and phasing programme in relation to community infrastructure, so that facilities identified as needed are provided in a timely and co-ordinated fashion.”*

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 (please refer to the table below for details and also Section 2.1 of the State of Response to the ABP Opinion Letter, prepared by Downey Planning).

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

SN6: *“To support and encourage the future growth of a wide range of public, social and community services essential to local community life, and to promote and seek to provide multi-use, fit-for-purpose community facilities which are suitable for all ages and all abilities, are operated according to an effective and efficient management strategy, and which are accessible in terms of physical design, location, cost of use, and opening hours.”*

The Development Plan recognises the importance of building sustainable communities and on this basis, it is submitted that the proposed development is consistent with these policies. For further information on the proposed development's consistency with the Urban Design Manual, please refer to the enclosed architectural drawings, detailed Housing Quality Assessment and Architectural Design Statement prepared by Wilson Architecture, which provide confirmation that the proposed development is consistent with the design standards and policies of the pertaining Development Plan. A Community and Social Infrastructure Audit has also been prepared by Downey Planning and is enclosed under separate cover. This audit provides detailed information and assessment on the existing infrastructure currently serving Belcamp and surrounding environs.

4.1.5 Movement and Transport

As emphasised in the Development Plan, one of the major challenges facing Dublin City Council is the need to promote and provide for sustainable transport options, whilst maintaining the effectiveness of the County's road network. In this instance, the Development Plan states that in order to maximise the use of public transport infrastructure and minimise car dependence, higher densities and interactive mixed uses will be encouraged within walking distance of public transport corridors and

nodes (rail stations and interchanges) and at other key locations such as key district centres. Some of the policies and objectives in this regard include:

MT01: *“To encourage intensification and mixed-use development along existing and planned public transport corridors and at transport nodes where sufficient public transport capacity and accessibility exists to meet the sustainable transport requirements of the development, having regard to conservation policies set out elsewhere in this plan and the need to make best use of urban land. Dublin City Council will seek to prepare SDZs, LAPs or other plans for areas surrounding key transport nodes, where appropriate, in order to guide future sustainable development.”*

MT2: *“Whilst having regard to the necessity for private car usage and the economic benefit to the city centre retail core as well as the city and national economy, to continue to promote modal shift from private car use towards increased use of more sustainable forms of transport such as cycling, walking and public transport, and to co-operate with the NTA, Transport Infrastructure Ireland (TII) and other transport agencies in progressing an integrated set of transport objectives. Initiatives contained in the government’s ‘Smarter Travel’ document and in the NTA’s draft transport strategy are key elements of this approach.”*

MT7: *“To improve the city’s environment for walking and cycling through the implementation of improvements to thoroughfares and junctions and also through the development of new and safe routes, including the provision of foot and cycle bridges. Routes within the network will be planned in conjunction with green infrastructure objectives and on foot of (inter alia) the NTA’s Cycle Network Plan for the Greater Dublin Area, and the National Cycle Manual, having regard to policy GI5 and objective GIO18.”*

MT12: *“To improve the pedestrian environment and promote the development of a network of pedestrian routes which link residential areas with recreational, educational and employment destinations to create a pedestrian environment that is safe and accessible to all.”*

MT13: *“To promote best practice mobility management and travel planning to balance car use to capacity and provide for necessary mobility via sustainable transport modes.”*

MT17: *“To provide for sustainable levels of car parking and car storage in residential schemes in accordance with development plan car parking standards (section 16.38) so as to promote city centre living and reduce the requirement for car parking.”*

MT19: *“To safeguard the residential parking component in mixed-use developments.”*

MT20: *“To increase capacity of public transport, cycling and walking, where required, in order to achieve sustainable transportation policy objectives. Any works undertaken will include as an objective, enhanced provision for safety, public transportation, cyclists and pedestrians, and will be subject to environmental and conservation considerations.”*

It is submitted that the proposed development at Belcamp is consistent with these policies and objectives. The development completion of the Belcamp LAP lands will ensure walking and cycling are viable options for the community, with the area also well served by existing public transport infrastructure, all of which will ensure that the future population utilise sustainable public transport and active travel options rather than car transport. This is outlined further in the enclosed Traffic and Transport Assessment prepared by Waterman Moylan Engineering Consultants and the Belcamp SHD Sustainable Transport Strategy Study prepared by SYSTRA Ltd as well as the Public Transport Capacity Report prepared by Derry O’Leary, which are all submitted under separate cover.

4.1.6 Land Use Zoning

Under the current Dublin City Development Plan, the subject site is zoned as a ‘Strategic Development and Regeneration Area – Zone 14’ (SDRA) which seeks:

“To seek the social, economic and physical development and/or rejuvenation of an area with mixed use of which residential and “Z6” would be the predominant uses.”

The proposed residential use and complementary land uses are permitted in principle. The proposed development will build on the existing attributes within Belcamp/Balgriffin and will form part of the overall development for the Belcamp lands through the introduction of 1,230 no. high-quality residential units proposed across the lands, alongside 1 no. childcare facility retail/commercial floor space (901.4 sq.m. GFA) on lands within the functional area of Dublin City Council.

It is therefore considered that the proposed development is consistent with the objectives of the SDRA zoning designation.

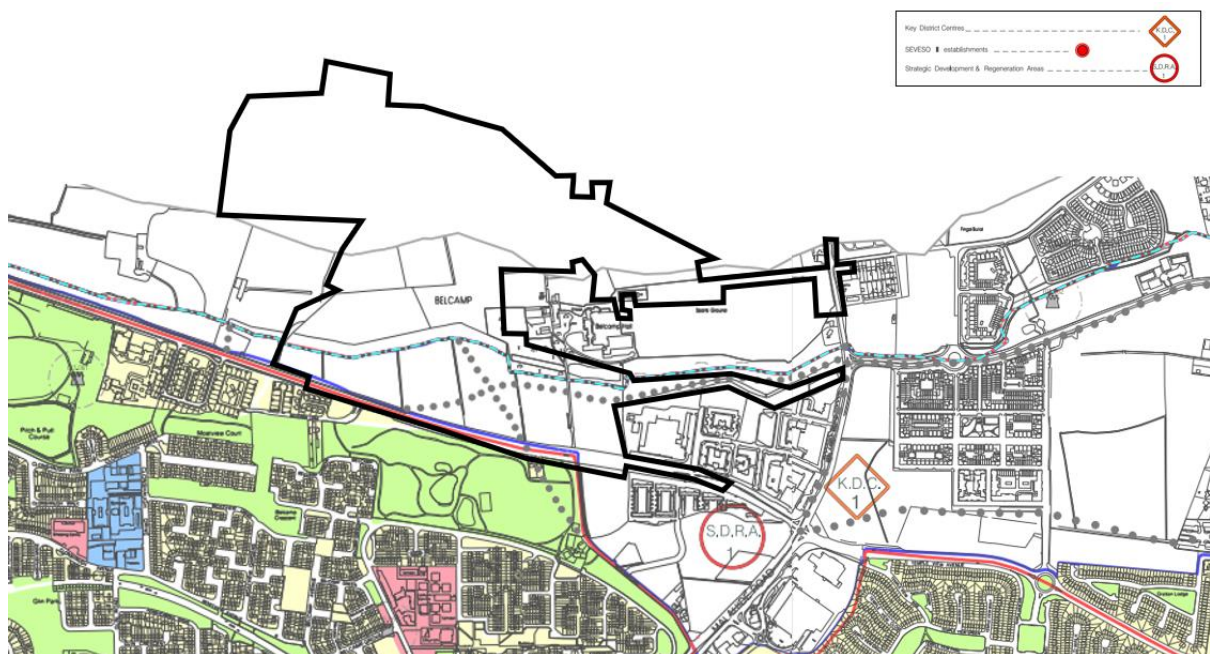


Figure 3: SDRA zoning (subject lands in black)

The following relevant use classes are related to this zoning objective:

Zoning Objective Z6	Zoning Objective Z14
<p>Permissible Uses</p> <p>Betting office, car park, childcare facility, conference centre, cultural/recreational building and uses, embassy office, enterprise centre, green/clean light industries, hotel, industry (light), live-work units, office (within canal ring), open space, park and ride facility, public service installation, restaurant, science and technology-based industry, shop (neighbourhood), training centre, cultural, creative and artistic enterprise and uses.</p>	<p>Permissible Uses</p> <p>Betting office, buildings for the health, safety and welfare of the public; childcare facility, community facility, conference centre, cultural/recreational building and uses, education, embassy office, embassy residential, enterprise centre, green/clean industries, halting site, home-based economic activity, hotel, industry (light), live-work units, media-associated uses, medical and related consultants, offices, open space, park and ride facility, part off-licence, place of public worship, public service installation, residential, restaurant, science and technology-based industry, shop (neighbourhood), training centre.</p>
<p>Open for Consideration Uses</p> <p>Advertisement and advertising structures, car trading, civic and amenity/recycling centre, factory shop, funeral home, garage (motor repair/service), nightclub, office, outdoor poster advertising, petrol station, place of public worship, public house, residential, veterinary surgery, warehousing (retail/non-food)/retail park, warehousing.</p>	<p>Open for Consideration Uses</p> <p>Advertisement and advertising structures, bed and breakfast, car park, car trading, civic and amenity/recycling centre, factory shop, financial institution, funeral home, garage (motor repair/service), garden centre, golf course and clubhouse, hostel, internet café, nightclub, off-licence, outdoor poster advertising, petrol station, pigeon lofts, public house, take-away, veterinary surgery, warehousing (retail/non-food)/retail park, warehousing.</p>

Figure 4: Permissible Uses under Zoning Designation Z6 and Z14

4.1.7 Strategic Development and Regeneration Areas (SDRA)

The proposed development is located in an area designated ‘SDRA 1 North Fringe (Clongriffin-Belmayne)’. The Development Plan states that, *“the north fringe action area plan was first produced for the North Fringe lands in 2000, setting out the objective to extend the metropolitan core and create a new dynamic mixed-use urban quarter. With a strong urban design framework in place, much has already been achieved including the development of over 3,400 new homes and 41,000 sq. m of commercial floor space. In addition, key water and drainage infrastructure, a new railway station and public square, sections of the new main boulevard and the much-acclaimed Father Collins Park are all in place.”*

A statutory local area plan was subsequently produced for the area and adopted by the City Council in December 2012 (Clongriffin-Belmayne Local Area Plan (LAP) 2012-2018, extended until 2022). It sets out a detailed framework and phasing mechanism for the development of the remaining key sites, with the aim of providing approximately 8,000 new homes upon completion. The local area plan is based on the following key objectives/guiding principles:

- “1. To create a highly sustainable, mixed use urban district, based around high quality public transport nodes, with a strong sense of place.*
- 2. To achieve a sufficient density of development to sustain efficient public transport networks and a viable mix of uses and community facilities.*

3. *To establish a coherent urban structure, based on urban design principles, as a focus for a new community and its integration with the established community.”*

It is submitted that the proposed development complies with the aforementioned objectives as set out in the Local Area Plan. The LAP is further assessed in Section 4.2 below.

4.1.8 Development Management Standards

The Dublin City Development Plan 2016-2022 sets out development standards and criteria from the policies and objectives of the City Development Plan to ensure that development occurs in an orderly and efficient manner and that it is in accordance with proper planning and sustainable development. The following section assesses the main set of standards and criteria required for high-quality, sustainable development:

Table 2: Development Management Standards

Criteria	Compliance
Design Principles and Standards	
Design Principles	<p>The Development Plan notes that all development is expected to incorporate exemplary standards of high quality sustainable and inclusive urban design and architecture which is appropriate to its context and surrounding built environment. <i>“In the appropriate context, imaginative contemporary architecture is encouraged, provided that it respects Dublin’s heritage and local distinctiveness and enriches its city environment”</i>. The Plan goes on to state that, <i>“in particular, development will respond creatively to and respect and enhance its context, and have regard to:</i></p> <ol style="list-style-type: none"> <i>1. The character of adjacent buildings, the spaces around and between them and the character and appearance of the local area and the need to provide appropriate enclosure to streets</i> <i>2. The character, scale and pattern of historic streets, squares, lanes, mews and passageways</i> <i>3. Existing materials, detailing, building lines, scale, orientation, height and massing, and plot width</i> <i>4. The form, character and ecological value of parks, gardens and open spaces, and</i> <i>5. Dublin’s riverside and canal-side settings.”</i> <p>The proposed Strategic Housing Development is located in the northern city fringe. The overarching design principle for the Dublin City lands is to establish a coherent urban structure, based on urban design principles, as a focus for a new community and its integration with the established community. Furthermore, the design successfully creates a strong urban edge which integrates effectively along the R139 – which opens to the River Mayne Walkway and the setting adjacent the Belcamp Hall lands; thus, enhancing the character and context of the local area. Downey submit that the building design respects & enhances the existing context</p>

	<p>of the North Dublin Fringe. The Board are invited to refer to the Design Statement Prepared by Wilsons Architecture.</p>
<p>Sustainable Design</p>	<p>As stated with the Dublin City Development Plan 2016-2022 <i>“good design has a key role to play in both reducing waste and emissions which contribute to climate change and ensuring future occupants will be able to adapt to the impacts of changing climate”</i>.</p> <p>As outlined, Sustainable Design can be achieved through the use of the following systems:</p> <ul style="list-style-type: none"> • Green roofs and raised courtyards • Attenuation ponds, swales, wetlands and detention basins (in larger schemes) • Permeable paving • Infiltration planters • Water butts • Energy efficiency • Passive solar design including the orientation, location and sizing of windows. <p>Sedum-based Green Roof systems are proposed for the roof level of all the Blocks on the Dublin City Lands – which provide both Sustainable Urban Drainage and Open Space. Robust and energy efficient finishings have been chosen for a fully sustainable design solution. The Board are invited to refer to the Materials & Finishes Report and the Building Lifecycle Report Prepared by Wilson Architects and the Landscape Plan by RMDA Landscape Architects for details on sustainable building design within the functional area of Dublin City Council.</p>
<p>Inclusive Design</p>	<p>As stated with the Dublin City Development Plan 2016-2022 inclusive design ensures; <i>the needs of occupants of different ages and stages of life should also be considered, ensuring scale, form, construction and internal arrangement of the building will enable future adaptability</i>.</p> <p>A key design element throughout the Dublin City Lands is inclusivity and connectivity; located close to established and recent neighbourhoods, new connection points will be provided to existing local amenities through natural routes/walkways promoted by an active landscape scheme demonstrating the routes to individual destinations in the immediate and wider context. A potential to provide a range of unit mix, inclusivity is ensured for all households and so resulting in a vibrant and dynamic neighbourhood. The public open spaces and the public pedestrian routes are clearly identifiable as such and are open to all for access. The Board are invited to refer to Section 4.12.6 (Universal Design Statement) of the Architects Design Statement prepared by Wilson Architects and the Building Lifecycle Report for more details.</p>
<p>Design Standards</p>	

<p>Large-Scale Development</p>	<p>Dublin City Council will seek to ensure the following considerations are incorporated in proposals for large-scale development:</p> <ul style="list-style-type: none"> • <i>To create new compositions and points of interest</i> • <i>To provide high-quality new streets, squares and open spaces, where appropriate, linked to the surrounding street pattern, to maximise accessibility</i> • <i>To provide an appropriate mix of uses comprising retail, residential, entertainment, recreational, cultural, community- and/or employment generating uses; particular emphasis should be given to new and complementary uses and facilities that expand and improve the existing range of uses and facilities in the area</i> • <i>To carefully integrate appropriate planting and trees</i> • <i>To take into account existing and likely future patterns of traffic and pedestrian movement, including pedestrian desire lines</i> • <i>To retain existing and create new features to make an easily understandable urban environment, including active building frontages with clearly defined edges and safe public routes</i> • <i>To build in capacity to incorporate services to meet changing demands including pipe subways and infrastructure to allow future connection to district energy networks</i> • <i>Ensure waste storage facilities, servicing and parking are sited and designed sensitively to minimise their visual impact and avoid any adverse impacts on users of highways in the surrounding neighbourhood.</i> <p>Downey can confirm that the proposed development complies with Dublin City Councils Standards for Large-Scale Developments and that all necessary assessments have been undertaken as part of the application. For a full design overview and details on the urban design criteria used as part of this large-scale development, please refer to Wilson Architecture’s Urban Design Statement. The findings from the TTA (prepared by Waterman Moylan) has been incorporated into the overall design, particularly in relation to the route and alignment of the proposed road network, provision of bus stops within the site and also pedestrian and cycle connections through the site.</p> <p>It is also noted that Waterman Moylan engaged with the relevant service providers, such as Irish Water and have provided for appropriate capacity. This is confirmed within the Statement of Design Acceptance, which is submitted under separate cover.</p>
<p>Landscaping</p>	
<p>Hard Landscaping</p>	<p>All hard landscaping elements have been chosen to define the character of public open spaces. Please refer to the Public Realm Strategy and Design Strategy prepared by RMDA Landscape Architects for details on the materials, surface water management, boundaries and street furniture proposed as part of the development of Dublin City Lands.</p>

<p style="text-align: center;">Soft Landscaping Including Trees</p>	<p>As stated with the Dublin City Development Plan; <i>key requirements in relation to site development and landscaping works include the following:</i></p> <ul style="list-style-type: none"> • <i>Existing trees and vegetation should be retained where possible. See next section (16.3.3) for requirements relating to trees.</i> • <i>For larger sites, including institutional lands, development proposals must take cognisance of the existing landscape character and quality.</i> • <i>Where a large site adjoins a green corridor, public open space or area of high ecological value, any new public open space on the site should be contiguous to same to encourage visual continuity and expansion of biodiversity; this can assist in expanding the green infrastructure network.</i> • <i>Landscaping works should be integrated with sustainable urban drainage systems such that landscaping plans may include associated biodiversity areas or wetlands which can reduce surface water run-off.</i> • <i>Landscaping schemes should provide a hierarchy of different types of planting throughout the development in order to give visual variety. Green roofs, walls and permeable surfaces will be encouraged.</i> <p>As part of the overall Public Realm Strategy for the site, existing tree and hedgerow have been utilised long the River Mayne Greenway and Green Infrastructure Corridor. Furthermore, the intention is to connect each of the SuDs elements along public space corridors within the development lands where existing topography allows. Green roofs are used throughout the development within Dublin City Lands.</p> <p>Please refer to the Arborist Report prepared by the Tree File which includes a detailed assessment of existing trees on the development lands. The Planning Authority are also invited to refer to the Landscape Plan prepared by RMDA Landscape for details on how tree retention has been incorporated into the design, within the Dublin City lands.</p>
<p style="text-align: center;">Public Open Spaces</p>	<p>As stated within the Dublin City Development Plan 2016-2022; <i>there is a 10% requirement specifically for all residential schemes as set out in Section 16.10.1. This requirement also relates to other zonings such as Z6 and Z10.</i></p> <p>Appropriate and adequate open public space had been provided on the Dublin City lands to the north of the site at along the Mayne River. Two playgrounds have been provided which include kickabout areas, natural multi use play areas and playground equipment. Please refer to the Public Open Space drawing prepared by RMDA Landscape.</p>
<p>Building Height in a Sustainable City</p>	
<p>Height Limits and Areas for Low-Rise, Mid-rise and Taller Development* (See Building</p>	<p>The Dublin City Development Plan takes “<i>a co-ordinated approach... to the potential positioning of higher building forms across the city to create clusters, where appropriate, and prevent visual clutter or negative disruption of the city skyline.</i>” Within the Building Height in Dublin table the Northern City Fringe is classified as a Mid-rise area- up to 50m.</p>

<p>Height in Dublin)</p>	<p><i>Proposals for mid-rise and taller buildings must have regard to the assessment criteria for high buildings as set out below:</i></p> <ul style="list-style-type: none"> • Relationship to context, including topography, built form, and skyline having regard to the need to protect important views, landmarks, prospects and vistas • <i>Effect on the historic environment at a city-wide and local level</i> • <i>Relationship to transport infrastructure, particularly public transport provision</i> • <i>Architectural excellence of a building which is of slender proportions, whereby a slenderness ratio of 3:1 or more should be aimed for</i> • <i>Contribution to public spaces and facilities, including the mix of uses</i> • <i>Effect on the local environment, including micro-climate and general amenity considerations</i> • <i>Contribution to permeability and legibility of the site and wider area</i> • <i>Sufficient accompanying material to enable a proper assessment, including urban design study/masterplan, a 360 degree view analysis, shadow impact assessment, wind impact analysis, details of signage, branding and lighting, and relative height studies</i> • <i>Adoption of best practice guidance related to the sustainable design and construction of tall buildings</i> • <i>Evaluation of providing a similar level of density in an alternative urban form.</i> <p>The building heights proposed within the Dublin City lands materially contravene guidance on Building Height in Dublin. However, it is considered that the proposed development is consistent with the requirements of the <i>Urban Development and Building Heights Guidelines for Planning Authorities</i>. Please refer to Urban Design Statement prepared by Wilson Architects for details on building heights with the Dublin City lands, as well as the Material Contravention Statement prepared by Downey, which addresses this matter.</p>
<p>Access for All</p>	<p><i>Dublin City Council recognises the need for equality of access for everybody to all aspects of the built and external environment as an essential prerequisite of equal opportunities and the development of an inclusive society.</i></p> <p>It is noted that the design of the proposed development has taken cognisance of people with reduced mobility through the provision of universally accessible dwelling units as well as readily adaptable dwellings.</p> <p>It is submitted that inclusivity and access have fully influenced the design of the scheme, as follows:</p> <ul style="list-style-type: none"> - The development will be fully Part M compliant with easy access. Physical and visual barriers have been avoided and full passive surveillance has been designed into overlook all public realm areas. Street layouts, footpath arrangements, street and verge planting combine to allow pedestrians and cyclists easily navigate the scheme through the different character areas.

	<p>- An adequate compliance with Part V, delivering over a 20% of affordable/social apartments, 273 units will be provided on the Dublin City Lands - comprised within the three phases of development and including 1, 2 & 3 bed apartments.</p> <p>-The proposed development is also submitted to be designed in accordance with the recommendations of 'Buildings for Everyone' 2002 published by the National Disability Authority and Technical Guidance Document M Access and Use of the Building Regulations 2010.</p>
Historic Buildings and Access	<p><i>In assessing planning applications which relate to protected structures, regard shall be had to the protected status of the structure and the need to protect the special character.</i></p> <p>Belcamp Hall is recorded as a Protected Structure (RPS 463) under the current Fingal County Development Plan 2017-2023-Record of Protected Structures. The record includes the eighteenth-century original house, the Washington Monument, the Walled Garden, the bridge and the early twentieth-century chapel. All relevant Architectural Heritage impact assessments have been undertaken as part of this application. It is important to note that Belcamp Hall itself is not included within this SHD application.</p> <p><i>As summarised in Sheehan + Barry's report, the proposed SHD accords with established strategy for restoring and consolidating the historic buildings and landscape as the core asset within the overall development.</i></p>
Roads and Services	<p>The multidisciplinary design team considers that the proposed road and street design is consistent with the principles and guidance outlined in the Design Manual for Urban Roads and Streets (DMURS). Please refer to the DMURS Statement of Design Consistency and Engineering Assessment Report prepared by Waterman Moylan and submitted under separate cover.</p>
Standards for Residential Accommodation	
Floor Areas:	<p>Minimum overall apartment floor area*</p> <p>Studio-type 40 sq.m</p> <p>1-bed 45 sq.m</p> <p>2-bed 73 sq.m</p> <p>3-bed 90 sq.m</p> <p>Each building proposal is designed to meet or exceed these requirements. Please also refer to Architectural Design Statement prepared by Wilson Architecture and HQA for details on the Minimum Floor Area and Standards for apartments on the Dublin City lands.</p>
Mix of Residential Units:	<p>Each apartment development shall contain: A maximum of 25-30% one-bedroom units. A minimum of 15% three- or more bedroom units, however, the above mix of unit types will not apply to managed 'build-to-let' apartment schemes for mobile workers where up to 42-50% of the total units may be in the form of one bed or studio units.</p>

Block	Unit Type							Total No. of Units
	Studio	1-Bed	2-Bed Apt	2-Bed Duplex	3-Bed Apt	3-Bed Duplex	4-Bed	
Block 1	0	94	131	8	10	30	0	273
Block 2	0	71	65	8	0	16	0	160
Block 3	0	96	172	4	6	19	0	297
Block 4	0	70	165	13	20	17	0	285
Block 5	0	37	44	7	0	8	0	96
Block 6	0	19	72	8	13	7	0	119
Total	0	387	649	48	49	97		
Unit Mix (%)	0.0%	31.5%	52.8%	3.9%	4.0%	7.9%	0.0%	
Total	1230 Units							

The unit mix proposed as part of the development on Dublin City land Materially Contravenes the Dublin City Development Plan 2016-2022. Please refer to the Material Contravention Statement which has been prepared by Downey.

The proposal is designed to meet the requirements of Sustainable Urban Housing – Design Standards for New Apartments (December 2020) which sets out unit mix. The Planning Authority are invited to refer to Wilson Architectural Design Statement for details on *Aspect, Natural Lighting, Ventilation and Sunlight Penetration, Block Configuration, Entrance Lobbies, Circulation and Internal Space Configuration for Apartments.*

Aspect, Natural Lighting, Ventilation and Sunlight Penetration:

The Dublin City Development Plan 2016-2022 follows planning policy requirement in the 2015 Department Guidelines that the minimum number of dual aspect apartments that may be provided in any single apartment scheme shall be 50%. In certain circumstances, usually on inner urban sites, this may be further reduced to an absolute minimum of 33% where it is necessary to ensure good street frontage and subject to high quality design.

- Block 1 provides for a dual aspect ratio of 55.7%
- Block 2 provides for a dual aspect ratio of 61.3%,
- Block 3 provides for a dual aspect ratio of 46.1%
- Block 4 provides for a dual aspect ratio of 52.6%
- Block 5 provides for a dual aspect ratio of 52.1%,
- Block 6 provides for a dual aspect ratio of 68.1%

This provides an average of 55.98% across the apartment blocks within the DCC administrative area. We would state that the DCC lands are a central/accessible location and as such a rate of 33% for dual aspect would apply.

The units all meet the required levels of floor-ceiling height and ADF and sunlight values when assessed against the BRE209 Guide. This is confirmed within the report prepared by DKPI, submitted under separate cover.

Private & Communal Amenity Space

There are high-quality communal areas of open space provide across the overall scheme, which have been designed by RMDA Landscape Architects & Consultants, the details of which are provided within their plans and relevant documentation enclosed as part of this pre-application consultation request. Children play areas/equipment as well as areas where residents can relax and

integrate have also been successfully designed. The Development Plan, in accordance with the Apartment Guidelines, required approximately 8,559 sq.m. of communal open space. The communal courtyards and outdoor amenities within the development measure approximately 14021.6 sq.m. This area does not include the perimeter areas of open space that may be considered more incidental areas of open space. Thus, the development is consistent with the requirements of the Development Plan and Guidelines.

Required Communal Amenity				Proposed Communal Amenity				
Type	No. of Units	Rate	Area	Indoor Amenity	Area	Outdoor Amenity	Area	Area
Studio	0	x 3 m ²	0 m ²	Block 1	1190.6 m ²	Podium Courtyard		3726.9 m ²
1-Bed	387	x 5 m ²	1935 m ²	Block 2	161.1 m ²	Podium Courtyard		882.2 m ²
2-Bed	697	x 7 m ²	4879 m ²	Block 3	321.2 m ²	Podium Courtyard		2135.5 m ²
3-Bed	146	x 9 m ²	1314 m ²	Block 4	933.6 m ²	Podium Courtyard		2845.9 m ²
				Block 5	299.6 m ²	Podium Courtyard		603.3 m ²
				Block 6	349.9 m ²	Podium Courtyard		571.8 m ²
						Pocket Parks / Playgrounds / Landscaped Open Space		0.0 m ²
					3256.0 m ²			10765.6 m ²
Total	1230		8128.0 m²				14021.6 m²	

In general, each apartment unit has been provided with adequately sized balconies or patios/terraces which have been designed in accordance with quantitative and qualitative standards. Those units at ground floor level have been provided with appropriate boundary treatments to ensure privacy and security whilst also providing visual interest and distinction between spaces. Appropriate separation distances have been provided between apartment buildings to ensure privacy without compromising internal residential amenity of the apartments. Please refer to the RMDA Landscape Architects & Consultants plans and documents for further information.

Car Parking Standards

The development lands are classified as Zone 3 Parking Standards within the Dublin City Development Plan; for residential use within Area 3 there is a requirement for 1.5 spaces per dwelling. The parking requirements are shown in the table below:

Land Use Category	Parking Standard	No. of Units (DCC Lands Only)	Parking Requirement	Max/ Norm ?
Residential (Houses, Apartments and Duplexes)	1.5 per unit	1,230	1,845.0	Max
Pre-school facilities/crèche	1.0 per classroom	6 no. classrooms	6.0	Max
Café	1 per 150m ² Seating	417.8m ²	3	Max
Retail	1 per 75m ² GFA	417.8m ²	6	Max
Total	-	-	1,857	-

The proposed parking within the Dublin City lands is shown on the bellow table:

Description		No. of Units	No. of Spaces	Location	Ratio
Dublin City Council	Block 1	273	128	Under Podium	0.5
	Block 2	160	48	On-Street/Under Podium	0.3
	Block 3	297	76	On-Street/Under Podium	0.3
	Block 4	285	163	On-Street/Under Podium	0.6
	Block 5	96	52	Under Podium/Basement	0.5
	Block 6	119	23	Under Podium	0.2
	Visitor Spaces	N/A	25	On-Street	-
Commer	Crèche	6 Classrooms	3	On-Street	-
	Block 3 Café/Retail	393.4m ²	13	Under Podium	-
DCC Subtotal		1,230	531	-	0.4

	<p>Provision for parking materially contravenes the Dublin City Development Plan, this has been addressed as part of the Material Contravention Statement prepared by Downey as part of this application. It must be noted that relaxation of parking standard will be considered if the development is located in close proximity to quality public transport. Furthermore, Blocks 1 and 2 are proposed as Build-to-Rent, which warrants relaxation of minimum carparking standards.</p>																																																																																							
<p>Cycle Parking:</p>	<p>Secure cycle parking facilities shall be provided in new public transport Interchanges, Luas stops (in association with TII), Park and Ride facilities, office blocks, apartment blocks, shopping centres, hospitals, etc., in accordance with the standards set out in Table 16.2.</p> <p>In all parking zones - 1 per unit is required (Additional requirements for larger units and visitor parking will be decided on a case-by-case basis).</p> <table border="1" data-bbox="427 772 1332 1070"> <thead> <tr> <th rowspan="2">Description</th> <th rowspan="2">No. of Units</th> <th rowspan="2">No. of Bedspaces</th> <th rowspan="2">Total Requirement</th> <th colspan="3">No. of Bicycle Spaces Proposed</th> </tr> <tr> <th>Residential</th> <th>Visitor</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Dublin City Council Apartments</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Block 1</td> <td>273</td> <td>492</td> <td>629</td> <td>618</td> <td>26</td> <td>644</td> </tr> <tr> <td>Block 2</td> <td>160</td> <td>265</td> <td>345</td> <td>345</td> <td>14</td> <td>359</td> </tr> <tr> <td>Block 3</td> <td>297</td> <td>523</td> <td>672</td> <td>640</td> <td>42</td> <td>682</td> </tr> <tr> <td>Block 4</td> <td>285</td> <td>537</td> <td>680</td> <td>752</td> <td>46</td> <td>798</td> </tr> <tr> <td>Block 5</td> <td>96</td> <td>163</td> <td>211</td> <td>240</td> <td>24</td> <td>264</td> </tr> <tr> <td>Block 6</td> <td>119</td> <td>239</td> <td>299</td> <td>290</td> <td>20</td> <td>310</td> </tr> <tr> <td>Additional Visitor</td> <td>-</td> <td>-</td> <td>-</td> <td>-</td> <td>5</td> <td>5</td> </tr> <tr> <td>Crèche</td> <td>6 Classrooms</td> <td>-</td> <td>-</td> <td>-</td> <td>3</td> <td>3</td> </tr> <tr> <td>Block 3 Café/Retail</td> <td>418m²</td> <td>-</td> <td>-</td> <td>-</td> <td>19</td> <td>19</td> </tr> <tr> <td>DCC Subtotal</td> <td>1,230</td> <td>2,219</td> <td>2,834</td> <td>2,885</td> <td>199</td> <td>3,084</td> </tr> </tbody> </table> <p>Provision for bicycle parking is well above the minimum standers set within the Development Standards of the Dublin City Development plan. Overall, this will contribute to the sustainable mode of transport within the area.</p>	Description	No. of Units	No. of Bedspaces	Total Requirement	No. of Bicycle Spaces Proposed			Residential	Visitor	Total	Dublin City Council Apartments							Block 1	273	492	629	618	26	644	Block 2	160	265	345	345	14	359	Block 3	297	523	672	640	42	682	Block 4	285	537	680	752	46	798	Block 5	96	163	211	240	24	264	Block 6	119	239	299	290	20	310	Additional Visitor	-	-	-	-	5	5	Crèche	6 Classrooms	-	-	-	3	3	Block 3 Café/Retail	418m ²	-	-	-	19	19	DCC Subtotal	1,230	2,219	2,834	2,885	199	3,084
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4.1.9 Childcare Facilities

The Development Plan requires that childcare facilities be provided for residential schemes of 75 units or more. The childcare provision should be at a rate of *20 spaces per 75 units*. The proposed development should provide for up to *160 no. childcare spaces*. It is important to note that the calculations do not include 1-bedroom apartment units, they are not of a significant nature in terms of childcare demands as they cater for single persons or young professionals. As such, it has been reasonably assumed that the 2-bedroom apartments are unlikely to be used by families and thus will not generate a demand for childcare. This is in accordance with Section 4.7 of the 2018 guidelines ‘Sustainable Urban Housing: Design Standards for New Apartments’, which state:

*“Notwithstanding the Planning Guidelines for Childcare Facilities (2001), in respect of which a review is to be progressed, and which recommend the provision of one childcare facility (equivalent to a minimum of 20 child places) for every 75 dwelling units, the threshold for provision of any such facilities in apartment schemes should be established having regard to the scale and unit mix of the proposed development and the existing geographical distribution of childcare facilities and the emerging demographic profile of the area. **One-bedroom or studio type units should not generally be considered to contribute to a requirement for any childcare provision***

and subject to location, this may also apply in part or whole, to units with two or more bedrooms.”

There are 2 no. childcare facilities being proposed as part of the scheme, with a potential capacity of approximately 165 no. childcare spaces. It is submitted that this quantum would be below the required childcare provision as per aforementioned standards, however, it is considered that the quantum of existing childcare facilities available within the area, alongside the additional childcare facility proposed, would be sufficient to cater for the existing and future demands in the vicinity of the site. It should also be noted that there is a childcare facility granted in the parent permission for Belcamp and also a separate childcare facility is being proposed as part of Phase 1C, to the northwest of Belcamp Hall. A recent planning application has been lodged in this regard and is pending decision with Fingal County Council.

A Childcare Provision Assessment was undertaken as part of this application, which found that regarding the Childcare Facilities Guidelines; 362 no. childcare spaces, which is 165 no. childcare spaces above the proposed childcare spaces in the scheme. When utilising the demographic trending of the area over 2011-2016, the proposed development is anticipated to generate a requirement of 471 no. childcare spaces, which is 306 no. spaces above what is proposed as part of the scheme. However, an assessment of the existing childcare facilities indicates an overall maximum potential capacity of 961 no. spaces and a cumulative demand of 884 no. children in 2023. For full details on childcare facilities and demand within the locality for the development site please see the Childcare Provision Assessment prepared by Downey.

4.2 Clongriffin-Belmayne Local Area Plan 2012-2018

The Clongriffin-Belmayne Local Area Plan (LAP) 2012-2018, extended until 2022, *“provides a framework for proper planning and sustainable development of Clongriffin-Belmayne (the North Fringe) area in accordance with the policies and objectives of the Dublin City Development Plan”*. The lands around the North Fringe area were first proposed for development in 1999/2000 with the publication of an action plan to guide the development. As stated within the LAP, *“the two main objectives of the plan have been to provide a coherent urban structure with distinct identity and to integrate new and existing communities successfully.”*

4.2.1 Movement and Transport

In relation to Movement and Transport, the main aim seeks *“to promote eases of movement within and access to the area by incorporating a high quality, integrated transport network through improvements to the existing road, rail and public transport network, together with improved cycling and pedestrian facilities within the local area.”*

Some of the key objectives from the Movement and Transport section which are relevant to the proposed scheme include:

Objective - MTO2: “To provide new patterns of pedestrian and cycle movement in both the east-west and north-south directions throughout the area that is coherent, direct, safe and convenient.”

Objective – MTO4: *“To facilitate enhanced patronage and efficient utilisation of public transport and promote walking and cycling, through a range of means including a reduced provision of car parking for commercial development.”*

Objective - MTO8: *“To seek well integrated design solutions for adequate car parking within the design and layout of schemes with particular attention to visitor parking and car storage.”*

This subject site is well served by public transport, located in close proximity of a high-quality bus corridor connecting Dublin City Centre and Clongriffin Train Station. The proposed development complies with DMURS, has an adequate quantum of car parking and bicycle parking proposed which will further support the use of sustainable transport. In light of the above, it is submitted that the proposed development is consistent with the movement and transport objectives of the Local Area Plan.

4.2.2 Urban Design

The Urban Design section indicates *“that the principles of urban design will drive future development in the North Fringe to achieve a high-quality urban environment creating a neighbourhood where people will want to live, work and visit, now and in the future.”*

Some of the key objectives from the Urban Design section which are relevant to the proposed scheme include:

Objective - UD02: *“To promote the development of family orientated, high quality, adaptable, life long homes within the LAP area through creative design that still delivers a sustainable density to support the provision of services.”*

We note that a mix of unit types are provided within the subject lands, including own-door units and apartments, ranging from 1-3 bedroom units. Mixed tenure is being designed into the scheme including build to sell residential and build to rent as well as social and affordable housing.

Objective - UD03: *“To promote public spaces that provide both passive and active recreation and a connection to those forms of activities in the surrounding area.”*

This is being created through the provision of active public open space beside the Mayne River, which will be overlooked by the apartments and commercial spaces. Passive open space is also provided as part of the public open space.

Objective - UD04: *“To ensure high quality streetscapes are achieved through distinctive high quality street furniture, lighting, paving and public artwork that creates a distinctive character associated with the North Fringe.”*

This is all being provided for and set out on the Landscape plans and report (prepared by RMDA), which also includes for the provision of public art as well as street furniture, such as seating areas.

Objective - UD05: *“To design park spaces and all open spaces linkages to be part of the larger green network in particular from Father Collins Park to the surrounding area and*

along the River Mayne incorporating a dedicated network of cycle paths and pedestrian routes.”

A large public open space south of the Mayne River is being provided. This will form part of an existing linked space incorporating pedestrian and cycle facilities towards the Malahide Road, which has been partially constructed as part of the earlier Phase 1 scheme at Belcamp (Fingal Reg. Ref. F15A/0609 refers).

Objective - UD06: *“To achieve creative and unique character through public realm enhancements in all key development sites through development contribution levies and partnership with the divisions of Dublin City Council.”*

Objective - UD07: *“The height strategy for the LAP will seek positive integration of new building height with established character. Locations identified for special height character are the designated Key District Centres (in general 5 storeys minimum) and the Main Street Boulevard axis (in general four to five storeys). Heights of 2-6 storeys (including a set back at the top floor of a 5/6 storey building) may be facilitated subject to quality design criteria and set back requirements along the river corridor to complete the urban form of pavilion buildings to complete Marrsfield. One location for a landmark profiled building (10-14 storey office height equivalent) is designed adjacent to Clongriffin train station. In other locations, where 4 storeys residential height is proposed, some flexibility will be allowed on height equivalent (13m) to achieve design improvements to the façade.”*

We note that the height may exceed Objective UD07. However, the justification for the height of the proposed development is outlined in the Material Contravention Statement prepared by Downey Planning.

The Architectural Design Statement prepared by Wilson Architecture, along with the Landscape Rationale prepared by RMDA Landscape Architects & Consultants, which accompany this pre-application consultation request, outlines the urban design approach taken for this scheme. It aims to achieve the highest quality of residential and mixed-uses development which meets the needs of residents and visitors to the site.

4.2.3 Community and Social Infrastructure Policy

In relation to Community and Social Infrastructure, the LAP notes that, *“taking into account methods that have worked in the past and identifying the opportunities for enhancement of the community in the future Dublin City Council seek to create neighbourhood revitalisation, and promote principles of active citizenship and civic responsibility in the new and innovative ways. New developments should contribute to sustainable communities through the provision of sustainable social infrastructure that will ensure optimum use of community facilities.”*

Some of the key objectives from the Community and Social Infrastructure section which are relevant to the proposed scheme include:

Objective – CS01: *“To promote well designed, accessible and sustainable urban neighbourhoods throughout the LAP area that are well served by local facilities and public transport.”*

Objective – CS02: *“To ensure access for all to community and social infrastructure for community integration.”*

Objective – CS03: *“To ensure that buildings intended for community related facilities are designed as adaptable flexible spaces that accommodate a range of uses.”*

Objective – CS06: *“To seek to create safe and useable open spaces with each residential development for play through overlooking and passive surveillance.”*

Objective – CS08: *“To promote and encourage a socially inclusive community that cater for all age groups, that accord with the principles of universal design and that offer quality of opportunity and good services to all.”*

Objective – CS010: *“To encourage the provision of accessible sports, recreation and community facilities as part of a sustainable mix of uses for future development proposals within the LAP area.”*

The Belcamp lands enjoy the benefit of a granted residential development currently under construction. The proposed scheme includes additional lands to the east and south of the granted permission (Reg. Ref. F15A/0609 (ABP Ref. PL06F.248052), and subsequent amendments under Reg. Ref. F18A/0058, Reg. Ref. F19A/0220, and Reg. Ref. F19A/0221), thus enabling an improved form and design for a wider residential scheme to be developed. A Community and Social Infrastructure Audit was prepared by Downey as part of this planning application and is included under separate cover. It is noted that there is sufficient infrastructure in the area, which will be supported by additional on-site facilities to cater for this proposed development. The development is therefore consistent with the above objectives.

4.2.4 Infrastructure and Services Strategy

As stated within the Infrastructure and Services Strategy section, it is sought *“to deliver the necessary infrastructure to ensure adequate capacity to accommodate the quantum of development envisaged by the local area plan, and to ensure that the delivery of this infrastructure enhances the quality of the areas environment and facilitates the sustainable economic growth and co-ordinates development of the North Fringe.”*

Some of the key policies and objectives from the infrastructure and Services Strategy section which are relevant to the proposed scheme include:

Policy – ISP1: *“It is the policy of the council that infrastructure delivery shall facilitate and enhance the redevelopment of the key North Fringe LAP area to achieve its potential as a key Developing Area of the City, as identified in the Dublin City Development Plan.”*

Policy – ISP3: *“To ensure that development is permitted in tandem with available water supply and only where network capacity is available. New development must include details on water conservation measures and demand management measures.”*

Objective – ISO1: *“To protect existing and future infrastructure through the protection of wayleaves and co-ordination of developments with the requirements of infrastructure service providers.”*

Objective – ISO6: *“To require all proposed developments to carry out a detailed Flood Risk Assessment in accordance with the Departmental Guidelines on Flood Risk Management.”*

Objective – ISO7: *“All new developments shall be required to comply with the standards set out in the Greater Dublin Strategic Drainage Study (GSDS).”*

It is noted that Waterman Moylan Engineering Consultants have prepared detailed drawings and documentation which demonstrate consistency with the aforementioned objectives. Additionally, a site-specific flood risk assessment was carried out as part of the application and confirms that the site is not susceptible to flood risk. For further information in this regard, please refer to the enclosed engineering drawings and documentation, particularly the Engineering Assessment Report, submitted as part of this pre-application consultation request.

4.2.5 Sustainability Strategy

The Sustainability Strategy section begins with the statement: *“Developing the LAP area in a sustainable way will help to provide opportunities for citizens to live and work close to the city centre, close to suburban communities they may have grown up in and close to the natural amenities of the coast and north County Dublin. The opportunity is presented by the LAP is to consolidate the city and prevent sprawl and encroachment into further green field areas.”*

Some of the key policies and objectives of the Sustainability Strategy section which are relevant to the proposed scheme include:

Policy - SSP1: *“To support sustainable design and sustainable formats of development in the LAP area which will help Dublin City Council achieve its targets in reducing energy consumption and reducing carbon dioxide emissions in accordance with the Dublin City Energy Action Plan.”*

Objective - SSO1: *“To seek best practice in sustainable design and incorporation of green technology for all future development proposal in the LAP area across the levels of the individual buildings, the overall scheme and overall neighbourhood.”*

Objective – SSO2: *“To encourage the development of exemplary projects within the LAP area that demonstrate best practice in energy efficiency (both residential and commercial) and sustainable design.”*

The proposed development in this instance is consistent with the proper planning and sustainable development of the area. The development comprises a high-quality residential development well serviced by public transport, with frequent bus and rail services to and from Dublin City Centre. The

open space provisions will ensure a high-quality standard of living for residents and for visitors to the area. The scheme has been designed to minimise energy use and thus minimise carbon emissions through the use of energy efficient heating systems and encouraging sustainable transport.

4.2.6 Density

In relation to density, the LAP states:

“The LAP proposes a design-led approach to density, to achieve the optimum use of land resources and investment in infrastructure. Density is expressed in units per hectare (uph) and density standards are indicative. Clongriffin-Belmayne (North Fringe) LAP is located within a public transport corridor and based on the guidelines published by Department of Environment, Heritage and local Government on Sustainable Residential Development in Urban Areas a general minimum standards of 50 units per hectare should be achieved subject to appropriate design and amenity standards in the LAP area.”

“In areas outside the immediate 500 metre catchment of existing and future proposed public transport but still within a 1km catchment of a rail station, sustainable higher densities for high quality lifetime housing with associated community uses will be sought (general densities of 50 units per ha).”

“In areas outside the 1km catchment of the rail station, high quality family housing areas with associated community uses will be required at sustainable densities that achieve general target densities of 40-50 units per ha with some flexibility for schemes achieving 35-50 units per ha if the site location context in the LAP is considered appropriate, urban design criteria for the successful frontage onto streets and public open space is achieved, high standards of quality design are achieved and a quality mix of housing typology to include own door family housing is included.”

The subject site is located outside the 1km catchment of the Clongriffin Train Station, thus general target densities of 40-50 units per hectare is required. However, in this instance, the development proposes a total net density of c.112.8 units per hectare (66.7 units per hectare for the overall combined development across DCC and FCC administrative areas), which is consistent with the objectives of the LAP and national planning guidelines.

4.2.7 Height

In relation to taller buildings, the LAP states:

“The LAP will seek to protect the urban structure and landscape character of the North Fringe while encouraging well located new developments and higher densities, including where suitable, appropriately sited and designed taller buildings. The two designated KDC locations, as gateway locations with town centre functions are the most appropriate locations for higher profile buildings.”

“In recognition of this character, the LAP identifies three areas for potential future height, which are the Key District Centre's at Clongriffin rail station and the R139/Malahide Road Junction and the axis of the Main Street Boulevard connecting the two. These locations have been identified based on the understanding of the

existing urban structure of North Fringe and the vision to create a compact and sustainable urban neighbourhood.”

“Outside the KDC and Main Street locations, where 4 storeys residential height is proposed, some flexibility will be allowed on the height equivalent (13m) as set out under Section 17.6.2 of the Dublin City Development Plan to achieve design improvements to the façade. This will be considered on the merits of the urban design of the scheme, design of the façade and roofscape and on a case-by-case basis.”

“Proposals for buildings with height will be assessed against the policy of the Dublin City Development Plan. A tall building is defined as any building that is significantly taller than the prevailing height. A significant increase in building height may be accepted where it can be demonstrated that there is a strong urban design rationale for doing so, and where specific social, economic or architectural gains will be delivered by increasing height above the established height. All proposals for tall buildings must have regard to the criteria set out in section 17.6.3 of Dublin City Development Plan 2011-2017.”

The proposed development is generally consistent with the policies and objectives pertaining to building height within the Local Area Plan and the Dublin City Development Plan 2016-2022. Please refer to the Architectural Design Statement prepared by Wilson Architecture for further details on the proposed heights. It is noted that the objectives of the LAP in relation to building heights have also been superseded by the ‘*Urban Development and Building Heights, Guidelines for Planning Authorities*’ (2018).

4.2.8 Phasing & Implementation

Section 16.2 of the Clongriffin-Belmayne Local Area Plan outlines a long-term strategy for phasing. As stated within the Plan, *the emphasis on phasing next developments shall be to achieve positive integration of any new proposal with the existing residential developments which are currently separated from each other, in particular the locations of Belmayne, Marrsfield and Clongriffin.*

The phasing strategy for the LAP will be based on the following priorities:

- *Achieve the completion of the internal street network to improve movement across the Z14 zoned developing lands and connect communities.*

This shall be achieved through this development, including the provision of the Belcamp Parkway Road and East-West Link Road.

- *Prioritise walking and cycling routes that connect new residential estates in a direct way with local facilities that include Fr Collin's Park, the rail station, bus stops, town centre services and school facilities.*

This shall be achieved through the provision of dedicated cycle and pedestrian paths in the development that will include the connection to the existing River Mayne walkway connecting to the Malahide Road, where it can then further connect to the existing network and onto Fr. Collins Park and Clongriffin.

- *Deliver a sequence of interconnected neighbourhood parks along a green route suitable for walking and cycling and maximise the integration of this route and parkland amenities with development lands adjoining.*

This shall be achieved through the provision of an integrated network of public open spaces, which are clearly indicated in the Design Strategy Document and Landscape Plans and report prepared by RMDA.

- *Create a well defined sequence of next phase sites, with appropriate boundary treatments and improved physical and visual condition of vacant sites awaiting future development.*

The development of this phase of the development is justified and set out in Section 2.1 of the Statement of Response Document, prepared by Downey Planning.

- *Deliver incremental progress towards achieving a coherent spatial structure for the overall area with legible distinction between residential character areas, buildings defining important movement routes, buildings defining important park locations and buildings that define the key town centres.*

The Belcamp SHD represents a coherent and plan led approach to the future development of this large landbank. This was set out in the overarching Design Strategy document submitted with the application and set out in more detail within each of the architects and landscape architects design reports.

- *Require that the next planning applications seeking development /modification to previous permissions include within the application key sections of the internal street network, green route and open space network to incrementally achieve the completion of these services.*
- *Require that the next planning applications seeking development/modifications to previous permissions include within the planning application a management plan that demonstrates how the remaining vacant lands will be appropriately treated and bounded.*

These requirements have been achieved and included within the planning application.

Furthermore,

In consultation with the landowners and NAMA, who are key stakeholders to implement positive progress in the area and completion of the developing lands, a phasing strategy is presented which;

- *is considered to be responsive to the current and forecast property markets,*
- *brings forward the optimal locations to help re-integrate separate residential developments into an overall coherent spatial structure,*

- capitalises, through good integration, on investment in services and infrastructure made to date, and
- helps to achieve the priorities 1-7 as outlined above.

A phasing strategy is provided as part of this application with all of the key infrastructural works being provided for at the initial stage of the development.

Sequential mapping has been undertaken as part of this application, which shows that development along this northern city fringe has taken place from Clongriffin Station, where there are now limited available lands for development. Area's 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 Belcamp 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. 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 the next landbank to be developed. For further details on the sequential mapping undertaken as part of this application, please refer to the Statement of Response to An Bord Pleanála Pre-Application Consultation Opinion prepared by Downey.



Figure 5: Sequential Land Analysis of Clongriffin/Belmayne Lands

4.3 Fingal County Council Development Plan 2017-2023

4.3.1 Overarching Considerations

The subject site is located within the functional area of Fingal County Council. The development of the site is therefore informed by the policies and objectives of the Fingal County Council Development Plan. The policies and objectives of the Development Plan are underpinned by the following vision:

“Within the next 25 to 30 years, Dublin will have an established international reputation as one of Europe’s most sustainable, dynamic and resourceful city regions. Dublin, through the shared vision of its citizens and civic leaders, will be a beautiful, compact city, with a distinct character, a vibrant culture and a diverse, smart, green, innovation based economy. It will be a socially inclusive city of urban neighbourhoods, all connected by an exemplary public transport, cycling and walking system and interwoven with a quality bio-diverse green space network. In short, the vision is for a capital city where people will seek to live, work, experience, invest and socialise, as a matter of choice”.

4.3.2 Core Strategy & Housing Strategy

The purpose of the Core Strategy is to articulate a medium-to-longer term quantitatively based strategy for the spatial development of the area of the Planning Authority and in doing so, to demonstrate that a Development Plan and its policies and objectives are entirely consistent with national and regional policies and strategies.

Belcamp & Balgriffin have been identified as Consolidation Areas Within Gateway in the Development Plan. It is the goal of the Development Plan to *consolidate the new and existing areas of Balgriffin and Belcamp to create vibrant residential communities with appropriate local services and community facilities to serve the new population. Ensure that the necessary infrastructure is delivered in tandem with development and that the new built form respects the rich built and natural heritage of the surrounding environment and recognises the ecological sensitivity and hydrological connection with adjacent European Sites.*

The vision of the Fingal Development Plan is to grow the county in a long-term sustainable way as it enters a period of economic and population growth. The plan states, *“the emphasis of this Plan is to continue to consolidate the existing zoned lands and to maximise the efficient use of existing and proposed infrastructure. In this way the Council can ensure an integrated land use and transport strategy in line with national and regional policy. [...]. The development of larger areas of residential or mixed-use lands will only take place subject to the necessary infrastructure being available and to this end will be subject to a Local Area Plan. It is through the LAP process that, within the towns and villages, the detailed phasing and distribution of housing will be determined in line with the population and housing targets established at a strategic level.”*

In this instance, the subject site forms part of the overall landholding for the Belcamp lands, which have been identified as being subject to a Local Area Plan (LAP 9.B) which has not yet been implemented, and a specific objective for strategic road infrastructure. The proposed development forms part of the adjoining residential scheme for the Belcamp lands granted under Reg. Ref.

F15A/0609 (ABP Ref. PL06F.248052), and subsequent amendments under Reg. Ref. F18A/0058, Reg. Ref. F19A/0220, and Reg. Ref. F19A/0221, in various phases, thus ensuring the development of these lands is consistent with development plan policy.

The Development Plan estimates that 2,791 residential units can be produced within the Fingal administrative area of Belcamp (within 'Other Settlements'). The proposed development provides for an overall net density of c.47.9 dwellings per hectare (66.7 units per hectare for the overall combined development across DCC and FCC administrative areas), which is considered an appropriate density for the subject lands and in accordance with the objectives of the Development Plan and national policy guidance.

With regards to the housing strategy as set out within the Development Plan, there are three core principles which inform and guide the core strategy which are as follows:

- *“To ensure Fingal County Council provides for the development of sufficient housing to meet its obligations as set out in the Regional Planning Guidelines. - To identify the existing and likely future need for housing in the area of the Development Plan.*
- *To ensure that sufficient zoned lands are provided to meet the needs of the different categories of households.”*

It is submitted that the proposed development at Belcamp is consistent with the housing strategy as it will assist in the delivery of housing, of a sustainable density on appropriately zoned lands, in a highly accessible location, and within within a wider residential scheme for the Belcamp lands (granted under Reg. Ref. F15A/0609 (ABP Ref. PL06F.248052), and subsequent amendments under Reg. Ref. F18A/0058, Reg. Ref. F19A/0220, and Reg. Ref. F19A/0221). The subject site is also located within close proximity of a high-quality bus corridor connecting Dublin City Centre and Clongriffin Train Station, whilst providing a variety of unit types and mixed tenures for all, in a high-quality, vibrant community setting.

Variation No. 2 of Fingal County Development Plan 2017-2023

Variation No. 2 to the Fingal Development Plan 2017-23 responds to the recent changes in National and Regional planning policy, namely the publication of the National Planning Framework (NPF) in 2018 and the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES) in 2019. The NPF includes a National Strategic Outcome (NSO) to achieve compact growth and consolidation of Ireland's cities as a top priority.

Under the variation, with *Table 2.5 Fingal Settlement Hierarchy* Belcamp is classified as a *Dublin City and Suburbs Consolidation Area* within the *Metropolitan Area* with the remaining capacity for residential units in *Other Settlements* is 2,791 units (Table 2.2) of the potential 43,104 units for the county as a whole. The key tenet of the overall Settlement Strategy is the continued promotion of sustainable development through positively encouraging consolidation and densification of the existing urban built form – and thereby maximising efficiencies from already established physical and social infrastructure.

The variation notes that Consolidation Areas within the Metropolitan Area are *settlements across the County which have their own distinct character and sense of place but given their location in close proximity to Dublin City, respectively form consolidation areas within the Metropolitan Area.*

As a Consolidation Area within the Metropolitan the policy approach in these areas will be to gain maximum benefit from existing transport, social, and community infrastructure through the continued consolidation of the city and its suburbs. Future development will happen in a planned and efficient manner utilising opportunities to achieve increased densities where appropriate. Objective SS15 & SS16 of the variation to the Development Plan seeks to:

Strengthen and consolidate existing urban areas adjoining Dublin City through infill and appropriate brownfield redevelopment in order to maximise the efficient use of existing infrastructure and services.

Examine the possibility of achieving higher densities in urban areas adjoining Dublin City where such an approach would be in keeping with the character and form of existing residential communities, or would otherwise be appropriate in the context of the site.

The Development Strategy for Belcamp & Balgriffin seeks to promote the planned and appropriate infill & brownfield redevelopment to maximised existing infrastructure & services. Furthermore, as an area adjoining Dublin City, Belcamp can examine achieving higher densities.

It is submitted that the proposed development for the phased delivery of 1,296 units over a 10-year period within the Fingal lands, complies with the objectives of Variation No. 2 to Fingal County Development Plan 2017-2023 to promote sustainable development of infill lands within the Dublin City fringe. Belcamp adjoins the city boundary and is within close proximity the Dublin Airport, a major regional economic driver, allowing the lands to achieve higher densities.

4.3.3 Sustainable Neighbourhoods and Communities

In terms of sustainable communities and urban design in residential developments, the Development Plan states that “successful areas are places where people want to live, work and visit”. The Development Plan emphasises several characteristics that attractive places have in common:

- “Include a range of facilities focused in a consolidated area with a critical mass of attractions and make best use of the already established investment in the built environment; these attractions include a mix of shops as well as a wide range of financial, professional and government services together with cultural, entertainment and leisure facilities.

- Include a thriving local residential population which adds to the vitality and vibrancy of the area as it ensures activity outside of standard retail and office opening hours.

- Are easily accessible by a range of transport modes including cycling and walking, have sufficient good quality short stay car parking close to the core area, have good transport linkages within the centre, and have efficient arrangements for delivery of goods.

- *Present an attractive amenity in terms of the built environment and streetscape, streets and public spaces which are considered clean and safe, and have a sense of local identity and character, all of which greatly enhances the attraction of the centre.*
- *Have the vision and mechanisms in place to build on these existing assets, can overcome problems, adapt to both market and consumer needs and can secure appropriate and necessary improvements where required.*
- *Encourage and facilitate sustainable lifestyles and livelihoods.”*

It is submitted that the proposed development at Belcamp Hall is consistent with these criteria. The proposed residential development is located in an area which benefits from ease of access to a range of transport modes (including bus and rail) with cycling and walking also a key consideration of the proposed development. The influx of population arising from the proposed development will increase the critical mass required to further support public transport infrastructure. There is a range of retail, health, community and commercial facilities in the immediate vicinity of the subject lands, as well as a number of recreational amenities including parks and sports clubs. The design of the proposed development provides for an attractive development with a sense of character and place that will integrate the proposed development with the surrounding area and assist in the completion of the wider residential scheme for the LAP lands.

4.3.4 Movement and Transport

In relation to movement and transport, the Development Plan states that it will:

- Promote and facilitate movement to, from, and within the County of Fingal, by integrating land use with a high quality, sustainable transport system that prioritises walking, cycling and public transport.
- Provide an appropriate level of safe road infrastructure and traffic management, in particular to support commercial and industrial activity and new development.
- Work with all relevant stakeholders to seek a reduction in greenhouse gas emissions from transport.

The Plan notes that the integration of land-use and transport involves locating trip intensive land uses (such as high-density housing) near high-capacity public transport (such as DART, Metro, Luas, and Bus Rapid Transit). It benefits the land uses by providing high quality public transport for the greatest number of residents and employees. It benefits public transport by providing sufficient customers within its catchment to sustain the high cost of public transport infrastructure and services. Allowing higher density development to occur along public transport corridors increases the number of people within the walking catchment of the public transport service, which in turn increases the patronage of the service, and leads to an increase in its financial and economic viability and positive environmental impact. In this instance, the proposed development provides for a residential development of sustainable density in close proximity of high-frequency public transport in accordance with objectives set out within the Development Plan including:

Objective MT01 – *“Support National and Regional transport policies as they apply to Fingal. In particular, the Council supports the Government’s commitment to the*

proposed new Metro North and DART expansion included in Building on Recovery: Infrastructure and Capital Investment 2016-2021. The Council also supports the implementation of sustainable transport solutions.”

Objective MT02 – *“Support the recommendations of the National Transport Authority’s Transport Strategy for the Greater Dublin Area 2016-2035 to facilitate the future sustainable growth of Fingal.”*

Objective MT03 – *“Implement Smarter Travel – A Sustainable Travel Future policy and work to achieve the Key Goals set out in this policy.”*

Objective MT04 – *“At locations where higher density development is being provided, encourage the development of car-free neighbourhoods, where non-motorised transport is allowed and motorised vehicles have access only for deliveries but must park outside the neighbourhood, creating a much better quality public realm with green infrastructure, public health, economic and community benefits.”*

Objective MT05: *“Integrate land use with transportation by allowing higher density development along higher capacity public transport corridors.”*

Objective MT13: *“Promote walking and cycling as efficient, healthy, and environmentally friendly modes of transport by securing the development of a network of direct, comfortable, convenient and safe cycle routes and footpaths, particularly in urban areas.”*

Objective MT19: *“Design roads and promote the design of roads, including cycle infrastructure, in line with the Principals of Sustainable Safety in a manner consistent with the National Cycle Manual and the Design Manual for Urban Roads and Streets.”*

Objective MT22: *“Improve pedestrian and cycle connectivity to stations and other public transport interchanges.”*

Objective MT37: *“Implement traffic calming on particular roads and in appropriate areas of the County, especially residential areas, to reduce vehicle speeds in the interests of road safety and residential amenity. Ensure that where appropriate, traffic calming is included as a pre-condition as part of the development of all new estates or extensions to existing estates.”*

It is submitted that the proposed development at Belcamp is consistent with these policies and objectives. The proposed scheme will ensure walking and cycling are viable options for the community, with the area also very well served by existing public transport infrastructure, all of which will ensure that the future population utilise sustainable public transport and active travel options rather than car transport. Please refer to the enclosed Traffic and Transport Assessment prepared by Waterman Moylan Engineering Consultants for further details in this regard.

4.3.5 Cultural Heritage

Heritage is defined as including monuments, archaeology, heritage objects, architecture, flora, fauna, wildlife habitats, landscapes, seascapes, wrecks, geology, heritage gardens and parks and inland

waterways. It is the duty of the Planning Authority to protect Fingal's heritage in the interest of the proper planning and sustainable development of the area.

Architectural Heritage

Protected Structures – Belcamp Hall is categorised as a Protected Structure (Ref. 448). The Council's Register of Protected Structures specifically includes the following as being protected:

“Late 18th or early 19th century house, outbuildings & walled garden”.

It is a specific objective of the Development Plan for all development proposals to adhere to the following key specific objectives that apply to Protected Structures:

Objective CH20 – *Ensure that any development, modification, alteration, or extension affecting a Protected Structure and/or its setting is sensitively sited and designed, is compatible with the special character, and is appropriate in terms of the proposed scale, mass, height, density, layout, materials, impact on architectural or historic features, and junction with the existing Protected Structure.*

Objective CH21 – *Seek that the form and structural integrity of the Protected Structure is retained in any redevelopment and that the relationship between the Protected Structure and any complex of adjoining buildings, designed landscape features, or designed views or vistas from or to the structure is conserved.*

Objective CH22 – *Encourage the sympathetic and appropriate reuse, rehabilitation and retention of Protected Structures and their grounds including public access seeking that the Protected Structure is conserved to a high standard, and the special interest, character and setting of the building preserved. In certain cases the relaxation of site zoning restrictions may be considered in order to secure the preservation and conservation of the Protected Structure where the use proposed is compatible with the existing structure and this will only be permitted where the development is consistent with conservation policies and the proper planning and sustainable development of the area.*

Objective CH25 – *Ensure that proposals for large scale developments and infrastructure projects consider the impacts on the architectural heritage and seek to avoid them. The extent, route, services and signage for such projects should be sited at a distance from Protected Structures, outside the boundaries of historic designed landscapes, and not interrupt specifically designed vistas. Where this is not possible the visual impact must be minimised through appropriate mitigation measures such as high quality design and/or use of screen planting.*

Objective CH26 – *Prevent the demolition or inappropriate alteration of Protected Structures.*

Objective CH27 – *Demonstrate best practice in relation to the management, care and maintenance of Protected Structures by continuing the programme of commissioning*

Conservation Plans for the principal heritage properties in the Council's ownership and implementing the policies and actions of these Conservation Plans where they already exist.

Objective CH29 – *Ensure that measures to up-grade the energy efficiency of Protected Structures and historic buildings are sensitive to traditional construction methods and materials and do not have a detrimental physical, aesthetic or visual impact on the structure. They should follow the principles and direction given in the Department of Arts, Heritage and the Gaeltacht's publication Energy Efficiency in Traditional Building.*

The focus of the proposed development lies in strengthening the historic triangle of Belcamp House & Chapel – the Walled Garden – the Woodlands as the communal area within the proposed development for residents as well as visitors. The client intends to consolidate these assets as an amenity for the whole new community. The development lands under consideration within the SHD application do not contain any of the key Protected Structures nor do they impact directly on retained and restored historic landscape, as they were subject to the parent permission (F15A/0609 and subsequent amendment applications). They will however be adjacent or proximate to the historic core and restored landscape. For full details on the architectural heritage of the Belcamp lands, please refer to the Architectural Heritage Report prepared by Sheehan and Barry Conservation Architects and also the Historic Landscape Report, prepared by The Big Space. The overall setting and development proposal is also outlined in the Design Strategy report, which is also submitted under separate cover and was prepared as a collaborative document between the design team.

4.3.6 Land Use Zoning

Under the current Fingal County Council Development Plan, there are 3 different land use zonings pertaining to the subject site. The majority of the site is zoned "RA – Residential Area" which seeks:

"Provide for new residential communities subject to the provision of the necessary social and physical infrastructure."

The vision for the "RA – Residential Area" seeks to:

"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."

The proposed development represents an opportunity to create a high-quality residential and mixed-use environment. Firstly, the proposed site's layout & landscaping measures create distinctive neighbourhoods and residential characters within the site. Features of high amenity value that are key elements of the proposed development include the Mayne River and ponds, woodlands, and parts of the existing Belcamp lands, including Belcamp Hall and Walled Garden (which are outside the red line boundary of the application). Wayfinding and pedestrian routes through the site will offer residents and visitors "breathing space" within an open and unique setting. Furthermore, the provision of children's play equipment exceeds the standards in the Fingal County Development Plan 2017-2023.

Secondly, the residential mix facilitates a balanced community which contribute to the scheme's variety of ages and tenures thus, creating a high-quality and more socially inclusive residential development. This is achieved through the provision of 1-bedroom units through to 4- bedroom units in varying house types and tenure. This is in line with the goals within Housing For All (2021) which has recognised the need to cater for a broad range of buyers within the market, in order to achieve a sustainable housing system. The residential mix provides a good choice for future residents and caters for a broad range of housing requirements within the market, namely first-time buyers, young families, singles, downsizers, and retirees.

The subject site is also zoned 'OS – Open Space' which aims to *"Preserve and provide for open space and recreational amenities"*, and there are two sections to the north of the site zoned 'GB – Greenbelt' which aims to *"Protect and provide for a Greenbelt"*. In this instance, the vision for the 'OS – Open Space' seeks to:

"Provide recreational and amenity resources for urban and rural populations subject to strict development controls. Only community facilities and other recreational uses will be considered and encouraged by the Planning Authority."

Additionally, the 'GB – Greenbelt' seeks to:

"Create a rural/urban Greenbelt zone that permanently demarcates the boundary (i) between the rural and urban areas, or (ii) between urban and urban areas. The role of the Greenbelt is to check unrestricted sprawl of urban areas, to prevent coalescence of settlements, to prevent countryside encroachment and to protect the setting of towns and/or villages. The Greenbelt is attractive and multifunctional, serves the needs of both the urban and rural communities, and strengthens the links between urban and rural areas in a sustainable manner. The Greenbelt will provide opportunities for countryside access and for recreation, retain attractive landscapes, improve derelict land within and around towns, secure lands with a nature conservation interest, and retain land in agricultural use. The zoning objective will have the consequence of achieving the regeneration of undeveloped town areas by ensuring that urban development is directed towards these areas."

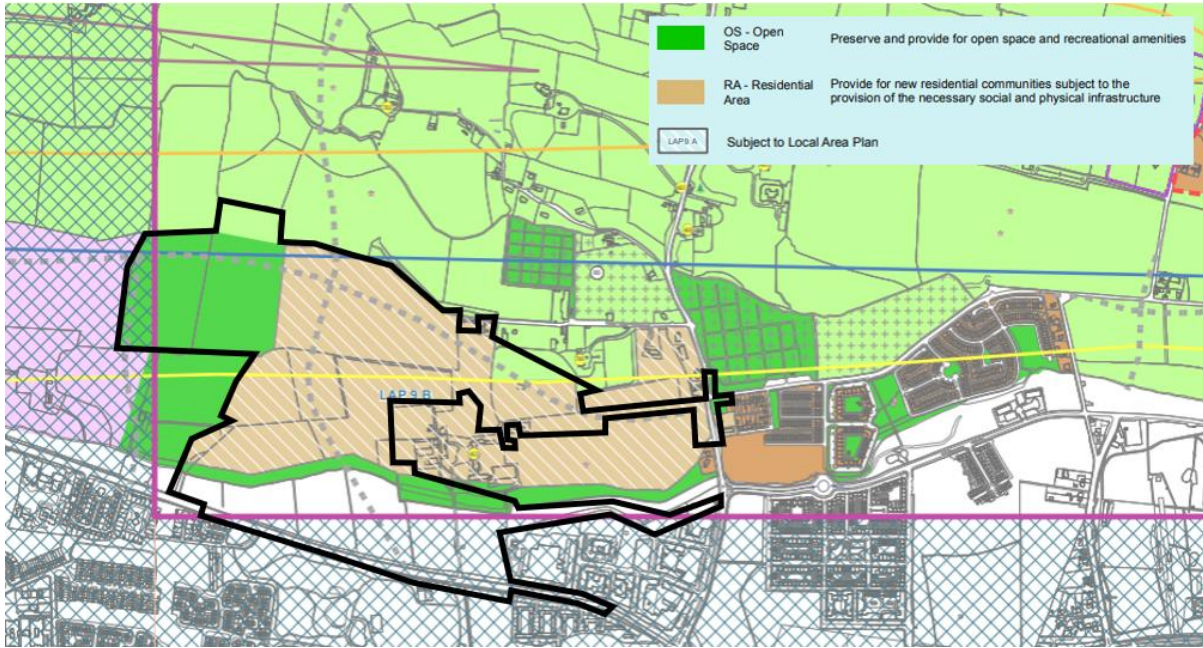


Figure 6: Land Use Zoning Map (application site outlined in black)

Under the 'RA' zoning objective (Fig. 9), the 'OS' zoning objective (Fig. 10), and the 'GB' zoning objective (Fig. 11), the following uses are permitted in principle:

Permitted in Principle		
Amusement Arcade ⁹	Bed and Breakfast	Betting Office ⁹
Childcare Facilities	Community Facility	Education
Funeral Home/Mortuary ⁹	Guest House	Health Centre
Health Practitioner	Hospital	Office Ancillary to Permitted Use
Office ≤ 100sqm ⁹	Office > 100sqm and < 1,000sqm ¹¹	Open Space
Place of Worship	Public House ⁹	Public Transport Station
Recreational Facility/Sports Club	Residential	Residential Care Home/ Retirement Home
Restaurant/Café ⁹	Retail - Local < 150 sqm nfa	Retail - Convenience ≤ 500 sqm nfa ⁹
Retail - Comparison ≤ 500 sqm nfa ⁹	Retail - Supermarket ≤ 2,500 sqm nfa ⁹	Retirement Village
Sheltered Accommodation	Sustainable Energy Installation	Taxi Office
Traveller Community Accommodation	Utility Installations	Veterinary Clinic

⁹ In a local centre only

¹¹ Only located in a local centre and of a scale appropriate to that centre

Figure 7: RA Land Use Zoning Matrix

Permitted in Principle		
Community Facility	Golf Course	Open Space
Recreational Facility/Sports Club		

Figure 8: OS Land Use Zoning Matrix

Permitted in Principle		
Agricultural Buildings	Agri-Tourism	Bed and Breakfast ³
Boarding Kennels ³	Burial Grounds ²⁹	Childcare Facilities ³
Community Facility	Farm Shop ²⁰	Golf Course
Guest House ³	Health Practitioner ³	Holiday Home/Apartments ⁷
Office Ancillary to Permitted Use	Open Space	Recreational Facility/Sports Club
Research and Development ¹⁴	Residential ⁴	Restaurant/Café ¹³
Veterinary Clinic ²¹	Campsite ²⁵	

³ Where the use is ancillary to the use of the dwelling as a main residence

⁴ Subject to compliance with the Rural Settlement Strategy

⁷ Only permitted where the development involves conversion of a protected structure

¹³ Ancillary to tourism uses or conversion of protected or vernacular structures where appropriate

¹⁴ Rural related research and development only

²⁰ Only where the bulk of the produce is produced on the farm

²¹ Only where a demonstrated need to locate in a rural environment because of the nature of the clinic required is established

²⁵ No static mobile homes or permanent structures (unless ancillary to the operation of the campsite) shall be permitted

²⁹ And appropriately scaled ancillary facilities

Figure 9: GB Land Use Zoning Matrix

The proposed development is therefore permitted in principle under the pertaining zoning objectives and is considered in accordance with the zoning objective and the necessary social and physical infrastructure for the area.

4.3.7 Site Specific Objectives and Designations

Under the current Development, the lands are subject to the following Objectives:

Objective BALGRIFFIN/BELCAMP 1: *“Promote high quality residential development which meets the needs of all stages of the life cycle through an appropriate mix of house type and local amenities.”*

The development proposes a high-quality residential and mixed-use development with a mix of house types, including houses, duplex apartments and apartment blocks with different unit sizes. A range of local amenities are also proposed, including childcare, recreational playing fields, urban plaza's, public open spaces, children's play equipment as well as retail units. This is in addition to the facilities already in place at Belcamp, including a Walled Garden and riverside walk.

Objective BALGRIFFIN/BELCAMP 2: *“Ensure that new communities are adequately served with accessible local services.”*

The development will be well served by both existing and proposed local services, which are readily accessible. A full assessment of this is outlined in the Community and Infrastructure Audit, prepared by Downey, which is submitted under separate cover.

Objective BALGRIFFIN/BELCAMP 5: *“Consider a limited quantum of development on the Belcamp LAP lands to facilitate the rehabilitation and preservation of Belcamp House prior to the adoption of Belcamp LAP. A design brief including the quantum and location of any such development, which shall not prejudice any future road requirements, shall be agreed with the Planning Authority prior to a planning application being lodged. Not more than 50% of any residential units permitted shall be sold or occupied pending the full re-instatement of Belcamp House to the satisfaction of the Planning Authority.”*

Objective BALGRIFFIN/BELCAMP 6: *“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.”*

In relation to Local Area Plans, the Development Plan indicates that, *“the preparation of Local Area Plans will enable a high degree of flexibility in the application of zoning and planning policies and assist in the application of the Council’s policies in relation to:*

- *Ensuring appropriate residential densities, especially where near to public transport links, with a requirement for a high standard of layout design and a mix of housing types.*
- *Providing for industrial and commercial uses to a high standard of design.*
- *Providing for the implementation of the Council’s objectives in relation to Green Infrastructure which seeks to address provision for biodiversity, parks and open space, sustainable water management, landscape character, and architectural and archaeological heritage in a coherent and integrated manner.*
- *Considering the feasibility of facilitating specific uses to provide appropriate employment opportunities.*
- *Providing for appropriate, viable and sustainable uses of the Greenbelts.*
- *Providing for the development of land to be phased with the provision of infrastructural and social facilities.*
- *Ensuring an appropriate mix of social, affordable and private housing.*
- *Providing for the development of viable rural communities.”*

The subject lands at Belcamp, whilst zoned for residential development, are also located in an area marked LAP 9.B and therefore are subject to a Local Area Plan. To date a Local Area Plan has not been prepared or adopted for the Belcamp lands by Fingal County Council. Therefore, the proposed development materially contravenes Objective BALGRIFFIN/BELCAMP 6 of the Fingal County Development Plan in that a Local Area Plan has not yet been prepared or adopted for the lands at Belcamp Hall.

In this regard, it is important to note that the proposed development forms part of the overall Belcamp LAP lands, thus representing an expansion on the already granted Phase 1 development for the

Belcamp lands (under Reg. Ref. F15A/0609 – ABP Ref. PL06F.248052, and subsequent amendments under Reg. Ref. F18A/0058, Reg. Ref. F19A/0220, and Reg. Ref. F19A/0221) and provides a design, layout, and scale, which follows from the already approved permissions mentioned above. The layout and street pattern of the proposal provide permeability between the adjacent lands and overall landholding.

Furthermore, it is submitted that the proposed scheme will also contribute to improving pedestrian and cycle linkages in the area, with dedicated cycle lanes are proposed across the scheme, while the street pattern allows easy cycle connection to Phase 1 of the Belcamp LAP lands, and the linear woodland park along the Mayne River. Pedestrian linkages are provided throughout the scheme in order to facilitate pedestrian crossing to connect the proposed development to the wider area.

As such, it is considered that the proposed residential development will assist in achieving quality developments in terms of urban design, structure, delivery of community/amenity facilities and permeability. The Architectural Design Statement prepared by CCK Architects & Urban Designers, which is enclosed under separate cover, sets out the site analysis for the entire Belcamp lands. Please refer to the enclosed supporting documentation which sets out the design principles for the development of the Belcamp lands in the context of the specific policies and objectives for the lands as set out in the Fingal Development Plan 2017-2023.

4.3.8 Development Management Standards

Criteria	Compliance
12.1 Background	
Pre-Planning	<p>Downey and the applicant engaged in pre-application consultation meetings with representatives of Dublin City Council regarding the proposed Strategic Housing Development on lands at Belcamp, Malahide Road, Dublin 17 on 31/05/2018, 18/01/21, 12/03/21 & 01/07/21.</p> <p>Downey and the applicant engaged in pre-application consultation meetings with Fingal County Council regarding the proposed Strategic Housing Development on lands at Belcamp, Malahide Road, Dublin 17 on 23/02/21 & 15/06/21.</p> <p>On 24th November 2021, Downey and the applicant engaged in a pre-application consultation meeting with representatives of An Bord Pleanála and Fingal County Council regarding the proposed development as part of a Stage 2 consultation meeting. On 08/11/2021, An Bord Pleanála issued the notice of pre-application consultation opinion for the proposed development, under case reference ABP- 311570-21.</p> <p>For the detailed response to this opinion and to source the requested information within the application documentation, please refer to the “Statement of Response to An Bord Pleanála’s Pre-Application Consultation Opinion” prepared by Downey.</p>
12.2 Common Principles for all Planning Applications	

Access for All	<p>It is noted that the design of the proposed development has taken cognisance of people with reduced mobility through the provision of universally accessible dwelling units as well as readily adaptable dwellings.</p> <p>It is submitted that inclusivity and access have fully influenced the design of the scheme, as follows:</p> <ul style="list-style-type: none"> - The development will be fully Part M compliant with easy access. Physical and visual barriers have been avoided and full passive surveillance has been designed into overlook all public realm areas. Street layouts, footpath arrangements, street and verge planting combine to allow pedestrians and cyclists easily navigate the scheme through the different character areas. - The provision of 1 to 4-bed units in a proportioned mix will include a wide diversity of households, bringing a new inclusive community at Belcamp & Balgriffin. - An adequate compliance with Part V, delivering over a 20% of affordable/social apartments and houses, 532 units in total, comprised within the three phases of development and include apartments, duplexes and houses. Please refer to architectural drawings for further detail on the Part V plan. -The proposed development is also submitted to be designed in accordance with the recommendations of 'Buildings for Everyone' 2002 published by the National Disability Authority and Technical Guidance Document M Access and Use of the Building Regulations 2010. - Disabled parking is also being provided for within the scheme. <p>For further details in this regard, please refer to Universal Access Statement prepared by CCK Architects and submitted as part of this application.</p>
Green Infrastructure	<p>A key element of the proposed development's design strategy has been the incorporation of existing and new green infrastructure. The principal green infrastructure existing within the proposed development lands include hedgerows and drainage ditches, while new green infrastructure is comprised of high-quality public spaces, creation of links to existing parkland, new tree lines and SUDS (SW detention basins, swales and integrated construction wetlands)</p> <p>The Mayne River Greenway and the Belcamp Greenway Corridor are new strategic recreational amenities proposed as part of the proposal which incorporate green infrastructure. Please refer to TBS Landscape Architects for further details on landscape and public realm strategy which incorporate green infrastructure.</p>
Sustainable Design	<p>Efficiency through design has been achieved in the macro scale in terms of layout and site configuration with good attention to detailing of the individual dwelling plan forms providing energy efficiency and reduced lifetime running costs of the overall scheme. Efficient planning and design have also been brought into the layouts of the individual dwelling units planned, along with apartments and duplex units.</p>

	<p>The design brief was set to create an exemplar of sustainable design to ensure all new development can be delivered in a manner that protects and enhances the biodiversity of the local environment, mitigates climate change and delivers high energy efficiency in accordance with NZEB strategies.</p>
<p>Environmental Impact Assessment</p>	<p>Given that 2,527 no. units are proposed (of which 1,296 no. are proposed on Fingal County Council lands) and indeed noting that the application site extends to an overall of c. 67.8 hectares within what can be considered a built-up area, an Environmental Impact Assessment Report has been prepared as part of the proposed application. Please refer to the enclosed EIAR which assesses the overall development and is enclosed with this SHD application for the consideration of the Board.</p>
<p>Screening for Appropriate Assessment</p>	<p>The Fingal Development Plan 2017-2023 states that all plans and projects are to comply with Article 6 of the Habitats Directive and adhere with the following Development Plan objectives:</p> <p>Objective DMS01 – Ensure that all plans and projects in the County which could, either individually or in combination with other plans and projects, have a significant effect on a European site or sites are subject to Screening for Appropriate Assessment.</p> <p>Objective DMS02 – Ensure Local Authority development proposals are subject to environmental assessment, as appropriate, including Screening for Appropriate Assessment and Environmental Impact Assessment.</p> <p>An Appropriate Assessment Screening report and NIS have been carried out by Pádraic Fogarty of Openfield Ecological Services as part of this Strategic Housing Development Planning Application which indicate that surface hydrological pathways exist to Baldoyle Bay and significant effects cannot be ruled out for the Baldoyle Bay SAC and SPA. It was considered that the potential for large quantities of sediment or other construction pollutants to be washed into Baldoyle Bay, due to the proximity of works to open water courses, means that significant effects to habitats and species within the SAC cannot be ruled out at this stage. All other European sites were screened out.</p> <p>A Natura Impact Statement has also been prepared to assess the possibility of adverse effects on the integrity of Baldoyle Bay SAC and SPA. with mitigation measures proposed These assessments have shown the development, when assessed either alone or in combination with other plans and projects, taking into account best scientific information, will not result in adverse effects on the integrity of European sites.". Please refer to the enclosed Appropriate Assessment Screening Report and Natura Impact Statement prepared by Openfield Ecological Services for further details.</p> <p>An Environmental Impact Assessment Report has also been prepared and is submitted under separate cover as part of this application.</p>
<p>12.3 Design Criteria for Urban Development</p>	

<p>High Quality Urban Design</p>	<p>The Development Plan defines several objectives to support high quality urban design. It will allow the creation of accessible places where people want to live, work and spend time. It is the policy of the Council to ensure all development is of a high-quality design and promotes the achievement of accessible, safe and sustainable built and natural environments, which reflect the special character and heritage of the County and its varied townscapes and landscapes. Design principles are based on the ‘<i>Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities</i>’ and ‘<i>Best Practice Urban Design Manual</i>’. Which contains twelve design principles to be applied to all developments with Objective DMS03 requiring:</p> <p><i>“Submit a detailed design statement for developments in excess of 5 residential units or 300 sqm of retail/commercial/office development in urban areas. The design statement is required to:</i></p> <ul style="list-style-type: none"> ▪ <i>Explain the design principles and design concept.</i> ▪ <i>Demonstrate how the twelve urban design criteria (as per the ‘Urban Design Manual - A Best Practice Guide’) have been taken into account when designing schemes in urban areas. Each of the twelve criteria is of equal importance and has to be considered in an integrated manner.</i> ▪ <i>Outline how the development meets the Development Plan Objectives, and the objectives of any Local Area Plan, Masterplan, Urban Centre Strategy, Framework Plan or other similar Plan affecting the site.</i> ▪ <i>Include photographs of the site and its surroundings.</i> ▪ <i>Include other illustrations such as photomontages, perspectives, sketches.</i> ▪ <i>Outline detailed proposals for open space and ensure the provision of open space is designed in from the beginning when designing a new scheme.</i> ▪ <i>Outline a detailed high-quality open space and landscape design plan including specifications, prepared by suitably qualified professionals.</i> ▪ <i>Outline how Green Infrastructure integrates into the scheme.”</i> <p>In accordance with the aforementioned objective, an Architectural Design Statement has been prepared by CCK Architects which sets out the proposed development’s compliance with the 12 Urban Design criteria and how the proposed development accords with the requirements of Objective DMS03. Please refer to the enclosed Architectural Design Statement and associated drawings prepared by CCK Architects for further information in this regard. Please also refer to the detailed landscaping proposals prepared by TBS Landscape Architecture and the photomontages and CGI’s prepared by Digital Dimensions.</p>
<p>12.4 Design Criteria for Residential Development</p>	

<p>Residential Zoning</p>	<p>The Fingal Development Plan 2017-2023 states that some RA zoning areas will be subject to either a Local Area Plan or a Masterplan.</p> <p><u>Local Area Plan:</u></p> <p>It is an objective of the Development Plan to prepare/implement a Local Area Plan for the lands at Belcamp during the lifetime of the Development Plan under ‘Objective BALGRIFFIN/BELCAMP 6’, which states:</p> <p><i>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.</i></p> <p>To date a Local Area Plan has not been prepared or adopted for the Belcamp lands by Fingal County Council. The proposed development materially contravenes the Fingal County Development Plan 2017-2023 as it relates to Objective Balgriffin/Belcamp 6 regarding the preparation of a Local Area Plan. The Board are invited to refer to the Material Contravention Statement and the Statement of Response to An Bord Pleanála for details on the need for a Local Area Plan on the lands.</p>
<p>Mix of Dwelling Types</p>	<p>The Development Plan states that the dwelling mix in any residential scheme should provide a balanced range of dwelling types and sizes to support a variety of household types. In this regard, the proposed development provides for 2527 no. new residential units with ancillary amenity facilities and 2 no. childcare facility. This provides for a variety of unit types encompassing a mix of one, two and three bed apartments, two, three and four bed houses, one, two and three bed duplex units, all of which provide for a mix and variety of unit types in accordance with the Development Plan and indeed the mix requirements as set out within the <i>‘Design Standards for New Apartments Guidelines for Planning Authorities’</i> and the <i>‘Delivering Homes, Sustaining Communities: Statement on Housing Policy’</i>.</p> <p>Whilst there are different apartment unit types and different house unit types provided, in terms of bedroom provision, it is also important to note that within these units, there is a significant amount of diversity in terms of size, layout, storage, aspect, room dimensions, etc. This ensures that the proposed development provides for the various needs of potential future residents and that it is a sustainable form of residential development which can cater for all age demographics and is adaptable and flexible for their future needs, be it, single professionals, young couples, small young families, older families, the elderly, those looking to downsize, etc.</p>
<p>Residential Density & Height</p>	<p>The Development Plan provides that the number of dwellings to be provided on a site should be determined with reference to the <i>‘Sustainable Residential Development in Urban Areas – Guidelines for Planning Authorities’</i> (2009). As a general principle and to promote sustainable forms of development, higher residential densities will be promoted within walking distance of town and district centres and high-capacity public transport facilities. In this regard, the proposed development provides for a sustainable development with an overall</p>

net density of c. 47.9 dwellings per hectare on the Fingal lands (66.7 units per hectare for the overall combined development across DCC and FCC administrative areas), on appropriately zoned lands, in a highly accessible location within Belcamp/Balgriffin and therefore accords with the density requirements of both the Development Plan and national guidelines.

Under the Fingal Development Plan 2017-2023, the lands are subject to the specific objectives under 'Objective BALGRIFFIN/BELCAMP 6' which seeks to prepare and/or implement a Local Area Plan on the Belcamp lands, in order 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.*

However, the Development Plan has another specific objective, '**Objective PM41**', which aims to,

"Encourage increased densities at appropriate locations whilst ensuring that the quality of place, residential accommodation and amenities for either existing or future residents are not compromised."

We shall now demonstrate that restricting the height of development through these specific local objectives at such a well-served location under the Fingal Development Plan 2017-2023 is a direct contravention of National Policy which promotes increased densities at well served sites and discourages general blanket height standards in certain urban areas, such as the subject site. Please also refer to the Material Contravention Statement prepared by Downey Planning for further information in this regard.

It is also noted that the Development Plan requires that Local Area Plans be prepared by Fingal County Council for designated lands. The subject lands are designated for the preparation for a Belcamp LAP. However, such a plan has yet to be prepared for the lands under Objective PM13. In the absence of a Local Area Plan for the lands, the proposed development materially contravenes Objective PM13 of the Development Plan.

However, the proposed development lands which are subject to the LAP, represent a limited quantum of lands available for development within the Dublin City fringe. Additionally, a sequential analysis has shown that development has taken place from Clongriffin Station in a westerly direction and the Belcamp landbank is the next available area for development. Moreover, it is considered that due to the nature of the lands, which has a single landowner, that the proposed development is appropriate in the absence of an adopted LAP 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 the lands in 2005.

The proposed development does materially contravene the objectives for Unit Mix and height as set out in the Development Plan. However, the justification for materially contravening the mix and height for the proposed development is

	<p>set out in full within the Material Contravention Statement prepared by Downey, which is submitted under separate cover.</p>
<p style="text-align: center;">Apartment Development</p>	<p>The ‘Design Standards for New Apartments Guidelines for Planning Authorities’ have superseded the design standards for apartments as set out in the Development Plan. However, the Fingal Development Plan contains a specific objective to support apartment development with the following objectives.</p> <p>Objective DMS20 – <i>Require the provision of a minimum of 50% of apartments in any apartment scheme are dual aspect.</i></p> <p>Objective DMS21 – <i>Allow a reduced percentage of dual aspect apartments only in circumstances where it is necessary to ensure good street frontage and subject to high quality design. In no instance will the provision be less than 33% of the number of apartments in the scheme.</i></p> <p>Objective DMS22 – <i>Require a minimum floor to ceiling height of 2.7 metres in apartment units, at ground floor level.</i></p> <p>Objective DMS23 – <i>Permit up to 8 apartments per floor per individual stair/lift core within apartment schemes.</i></p> <ul style="list-style-type: none"> • Block A and Block B provide for a dual aspect ratio of 87%, • Block C provides for a dual aspect ratio of 59.25%, • Block D provides for a dual aspect ratio of 64.26%, • Block F1 and F2 provides for a dual aspect ratio of 52%, • Block G provides for a dual aspect ratio of 51%, • Block H, Block L & Block M provides for a dual aspect ratio of 57%, • Block J provide for a dual aspect ratio of 60%, • Block N provides for a dual aspect ratio of 60.7%, • Block P provides for a dual aspect ratio of 82.6%, and, • Duplex Block Type 1, Type 2 and Type 3 provides for a dual aspect ratio of 78%. • Providing an average of 57.38% <p>With regards to Dual Aspect, the proposed apartment and duplex units are in accordance with Objective DMS20 and DMS21 of the Development Plan. The proposed development provides for 2.7 metres in apartment units, at ground floor level in accordance with Objective DMS22 of the Development Plan.</p> <p>The development is designed to have either one, two, three or four stair-cores to serve each apartment building, these all contain a lift to comply with the requirements of Part M of the Building Regulations. The number of units per core complies with SPPR 6. It is noted that some blocks have more units per core than recommended in the Development Plan, but this is justified within the Material Contravention Statement.</p> <p>Architect and Urban Design Statement prepared by CCK Architects. Please refer to the enclosed report for full details on the proposed development’s compliance with standards for apartment developments.</p>

<p>Quantitative Standards</p>	<p>The development proposal adheres with the Quality Housing for Sustainable Communities; Best Practice Guidelines for Delivering Homes and Sustaining Communities (DEHLG, 2007) and Sustainable Urban Housing: Design Standards for New Apartments Guidelines for Planning Authorities (DEHLG, 2020) when assessing proposals for apartment development.</p> <p>Please refer to the Accommodation Schedule and Architectural Design Statement prepared by CCK Architects for compliance in this regard.</p>
<p>Separation Distances</p>	<p>The Development Plan contains a specific objective where the minimum between opposing windows will apply. In certain instances, depending on orientation and location in built-up areas, reduced separation distances may be acceptable. Any relaxing of standards will be assessed on a case-by-case basis.</p> <p><i>Objective DMS28 – A separation distance of a minimum of 22 metres between directly opposing rear first floor windows shall generally be observed unless alternative provision has been designed to ensure privacy. In residential developments over 3 storeys, minimum separation distances shall be increased in instances where overlooking or overshadowing occurs.</i></p> <p><i>Objective DMS29 – Ensure a separation distance of at least 2.3 metres is provided between the side walls of detached, semidetached and end of terrace units.</i></p> <p>In this regard, the proposed development achieved various levels of separation distance between opposing windows. The development plan in certain cases does facilitate development having regard to the layout, orientation, and location of the units proposed as they are in areas where there will be little to no impact on existing or proposed housing units, i.e., end house locations. It is viewed that the proposed development is designed in accordance with Objective DMS28 & DMS29 of the Development Plan.</p>
<p>Daylight, Sunlight and Overshadowing</p>	<p>Objective DMS30 of the Development Plan requires that all new residential units comply with the recommendations of ‘<i>Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice</i>’ (B.R.209, 2011) and B.S. 8206 ‘<i>Lighting for Buildings, Part 2 2008: Code of Practice for Daylighting</i>’ or other updated relevant documents.</p> <p>The scheme has been designed to maximise daylight and sunlight; c.60% of apartments are dual aspect. Please refer to the detailed preliminary Daylight and Sunlight reports carried out by Waterman Moylan Engineers, which confirmed 100% compliance with the required standard.</p>
<p>Acoustic Privacy</p>	<p>Objective DMS31 of the Fingal County Development Plan requires that sound transmission levels in semi-detached, terraced, apartments and duplex units comply as a minimum with the 2014 Building Regulations Technical Guidance Document Part E or any updated standards.</p> <p><i>Objective DMS31 – Require that sound transmission levels in semidetached, terraced, apartments and duplex units comply as a minimum with the 2014 Building Regulations Technical Guidance Document Part E or any updated</i></p>

	<p><i>standards and evidence will need to be provided by a qualified sound engineer that these levels have been met.</i></p> <p>Downey submits that the proposed development intends to comply with the 2014 Building Regulations Technical Guidance Document Part E or any updated standards.</p> <p>For full details please refer to the Noise Impact Statement which has been submitted as part of the application under a separate cover letter.</p>
Open Plan Estates	The removal of the exempted development rights is subject to agreement with the Planning Authority and An Bord Pleanála as part of a condition to the granting planning permission.
Gated Communities	Objective DMS32 of the Fingal County Development Plan prohibits proposals that would create a gated community for any new residential developments. It is viewed that the proposed development is not a 'gated community' and will adhere with Objective DMS32 of the Development Plan in this instance.
Management Companies and Facilities for Apartment Developments	<p>Outlined in the Development Plan, higher-density apartment type development will require a management company to maintain communal areas. It is a specific objective to adhere with the following: -</p> <p>Objective DMS33 - <i>Require properly constituted management companies in apartment type schemes are set up and necessary management structures are put in place for the benefit of the residents.</i></p> <p>Objective DMS34 - <i>Provide in high density apartment type schemes in excess of 100 units facilities for the communal use of residents as deemed appropriate by the Council.</i></p> <p>Objective DMS35 - <i>Require the provision of communal laundry rooms and storage facilities in high density apartment type developments where deemed appropriate.</i></p> <p>The proposed design provides for a high-quality development of purpose-built residential dwellings and apartment units, including Build-to-Rent units (within the Dublin City lands). The public and communal open spaces areas together with new local amenities will afford a high standard of residential environment to future residents. The development will also include a proposed community facilities, commercial space, and no. 2 creche facility together within a high quality public open space area which utilises & enhances the existing green infrastructure on the lands at Belcamp Hall and surrounding areas. It is envisaged that the open spaces, apartment schemes and communal areas will be controlled by a management company at a later post planning stage.</p> <p>Please refer to BTR Operational Management Plan prepared by Cortland Consult and the Building Management Plan (for private residential) and taking in charge map prepared by CCK Architects, which have been prepared as part of this application and submitted under a separate covers.</p>
Refuse Storage and Bins	The proposed development provides for refuse storage areas in accordance with Objective DMS36 and DMS37 of the Development Plan.

Objective DMS36 – Ensure all new residential schemes include appropriate design measures for refuse storage areas, details of which should be clearly shown at pre-planning and planning application stage. Ensure refuse storage areas are not situated immediately adjacent to the front door or ground floor window, unless adequate screened alcoves or other such mitigation measures are provided.

Objective DMS37 – Ensure the maximum distance between the front door to a communal bin area does not exceed 50 metres.

The proposed development provides for convenient and well-designed proposals for the storage of refuse within the apartment schemes. The storage of refuse is proposed at ground floor level at Blocks A, B, C and D, and the remaining apartment blocks are situated in enclosed spaces ensuring that refuse storage and bins are in accordance with objectives of the Development Plan.

For further details, please refer to the Housing Quality Assessment and Architect and Urban Designer’s Statement prepared by CCK Architects and the Operational Waste Management Plan prepared by Enviroguide.

12.7 Open Space

Table 12.5 of the Fingal Development Plan outlines the public open space hierarchy and accessibility standards. The standards allow the provision of a wide variety of accessible public open spaces to meet the diverse needs of the County’s residents. For all developments with a residential component a mix of public open space types should be provided where achievable.

Table 12.5 Open Space Hierarchy and Accessibility

Type of Public Open Space	Areas	Accessibility from homes	Note
Pocket Parks (Class 2 as per Development Contribution Scheme) Facilities for smaller children, but not necessarily formal play facilities. Have an important visual and social function also. Pocket parks must not be to the side or back of houses and must be adequately overlooked.	Between 500 sq m – 0.2 hectares	Every home within 150m walking distance	Provide pocket parks in all cases. No contributions in lieu
Small Parks (Class 2 as per Development Contribution Scheme) Depending on their size, these will accommodate playground facilities, kick about areas, and passive recreation.	Between 0.2 – 2 hectares	Within 400m walking distance of homes	
Local Parks (Class 1 as per Development Contribution Scheme) Accommodate playground facilities and a number of playing fields. Passive recreational and biodiversity areas will also be accommodated in these parks.	Between 2 hectares – 20 hectares.	400 metres.	
Urban Neighbourhood Parks (Class 1 as per Development Contribution Scheme). A wide variety of facilities and uses can be provided here due to their size. Biodiversity areas will also be accommodated in these parks.	Between 20 hectares – 50 hectares	Within 1km	
Regional Parks (Class 1 as per Development Contribution Scheme) Provide for a large range of uses. Formal and informal play areas, passive recreation areas, biodiversity areas and often a distinct attraction will be available on site.	Over 50 hectares	Within 5km	

Hierarchy and Accessibility

A detailed landscape plan has been prepared by TBS Landscape Architects. The proposed development provides for c.19.5ha of the total site area for open space which includes outdoor play opportunities for children in the form natural play areas, exercise stations and class 1 open space & active recreation (i.e

	<p>sports pitches with ancillary clubhouse, gym and changing rooms) which are accessible to all within the scheme and the wider community.</p> <p>The design of the development has been carefully considered with the public open space integrated as part of the development proposal that encompasses the grounds of Belcamp Hall and key landmarks such as the walled garden, the new town square and the Mayne Valley Park, which will provide for a substantial green space area that will cater for the residents of the subject site and the immediate local area. It is submitted that the provision of public open space is appropriate in this instance as the development utilises the historical & natural setting of Belcamp Hall and grounds as part of the public open space area.</p> <p>Father Collins Park (Class 1 Open Space Area) is located within 1.5 km east of the application site which extends to over 54 acres and encompasses some natural woodland as well as a 1.5km running track, six playing pitches, a concert amphitheatre and picnic areas with outdoor chess/draughts boards. It is submitted that given the proximity of the application site to Father Collins Park, the provision of public open space is appropriate in this instance given the provision of public open space facilities in the locality.</p> <p>Overall, the high-quality open space and public facilities proposed for the Belcamp lands will contribute to creating a self-sustaining community and enhance the offering for the wider community. Please refer to the relevant drawings and documentation prepared by TBS Landscape and RMDA Landscape.</p>
<p>Quantity</p>	<p>The Fingal Development Plan states that the minimum public open space should be carefully considered as part of new residential developments.</p> <p>Objective DMS57 – <i>Require a minimum public open space provision of 2.5 hectares per 1000 population. For the purposes of this calculation, public open space requirements are to be based on residential units with an agreed occupancy rate of 3.5 persons in the case of dwellings with three or more bedrooms and 1.5 persons in the case of dwellings with two or fewer bedrooms.</i></p> <p>The public open space requirement for the proposed development is therefore considered to be c.19.5 hectares (across the entire SHD lands). The proposed development provides for c.19.5 hectares of the site area within the Fingal administrative area for open space which includes outdoor play opportunities for children in the form of play areas which are accessible to all within the scheme and the wider community. The proposed development provides for open space which includes outdoor play opportunities for children in the form of a soft play area (i.e., playground) which are accessible to all within the scheme and the wider community.</p> <p>For further information on the children’s playground facility proposed as part of this Strategic Housing Development application, please refer to the Housing Quality Assessment, the Architect and Urban Designer’s Statement and associated drawings prepared by CCK Architects. Also, please refer to the enclosed landscape drawings and reports prepared by TBS Landscape Architects and RMDA Landscape for further information in this regard.</p>

<p>Design of Public Open Space</p>	<p>The proposed development provides for public open space in accordance with Objective DMS66 – DMS70 of the Development Plan.</p> <p>Objective DMS66 – Ensure open spaces are not located to the side or the rear of housing units.</p> <p>Objective DMS67 – Ensure open space provision is suitably proportioned and inappropriate narrow tracts are not provided.</p> <p>Objective DMS69 – Ensure developers lay out and maintain open space areas to a high standard, until such a time as they are taken in charge and facilitate the early handover of areas of public open space to the Council. The Council, at its discretion, may in certain circumstances accept a financial contribution in order to complete the landscaping and development of these areas.</p> <p>Objective DMS70 – Require properly constituted management companies to be set up and ensure that the necessary management structures are put in place where it is intended that open spaces will be retained in private ownership. Arrangements must be approved by the Council before completion of the project and must be in operation before release of required bonds.</p> <p>The proposed development provides for c.19.5 hectares of the total site area for open space which includes outdoor play opportunities for children in the form of play areas and playing pitches which are accessible to all within the scheme and the wider community.</p> <p>The design of the development has been carefully considered with the public open space integrated as part of the development proposal that encompasses Belcamp House, the key landmarks, town square, the Mayne River Greenway and the Greenway corridor, which will provide for a substantial green space area that will cater for the residents of the subject site and the immediate local area. It is submitted that the provision of public open space is appropriate in this instance as the development utilises the historical setting of Belcamp House and grounds as part of the public open space area. For further information in this regard, please refer to the Architect and Urban Designer’s Statement prepared by CCK Architects. Please also refer to the detailed landscaping proposals prepared by TBS Landscape Architects.</p>
<p>Green Corridors</p>	<p>The Development Plan states that green corridors should be incorporated into all new large developments, as part of Green Infrastructure provision, linking large areas of open space and linking with areas outside the development site.</p> <p>Objective DMS71 – Provide green corridors in all new developments where the opportunity exists.</p> <p>The proposed development will retain and utilise the natural ‘green corridor’ in order to:</p> <ul style="list-style-type: none"> • Create high quality public spaces that respond to their environment, are well designed, allow for a mix of active and passive recreation, facilitate ease of maintenance and are visually attractive.

	<ul style="list-style-type: none"> • To create multi-functional public spaces that provide a setting for amenity, biodiversity and water management. • To retain existing hedgerows (where achievable) and create new corridors that will encourage biodiversity and informal recreational use (refer to arborist hedgerow survey and report as prepared by The Tree File). • To create surface water elements based on the sites natural drainage that function as semi-natural spaces and sustainable drainage management (refer to Waterman Moylan’s engineering drawings) <p>The proposed development will retain and utilise the ‘green corridor’ setting of Belcamp through the provision of open spaces and tree lined linear paths within the Mayne River Greenway and the Greenway Corridor - these will provide opportunities for walking and cycling and informal recreation in areas where biodiversity is abundant. Please refer to TBS Belcamp Design Strategy & Public Realm Strategy for full details on the Belcamp GI Corridor/Biodiversity Loop and River Mayne Walkways.</p>
<p>Sustainable Urban Drainage Systems</p>	<p>The Development Plan encourages properly designed and located SuDS features can be incorporated within and can complement the amenity and aesthetic value of open spaces.</p> <p>Objective DMS73 – <i>Ensure as far as practical that the design of SuDS enhances the quality of open spaces. SuDS do not form part of the public open space provision, except where it contributes in a significant and positive way to the design and quality of open space. In instances where the Council determines that SuDS make a significant and positive contribution to open space, a maximum 10% of open space provision shall be taken up by SuDS. The Council will give consideration to the provision of SuDS on existing open space, where appropriate.</i></p> <p>Objective DMS74 – <i>Underground tanks and storage systems will not be accepted under public open space, as part of a SuDS solution.</i></p> <p>Please refer to the pertaining documents and drawings prepared by Waterman Moylan Consulting Engineers for further information in this regard.</p>
<p>Playground Facilities</p>	<p>Objective DMS75 of the Development Plan requires that children’s playground facilities within residential development be incorporated as part of a new residential developments.</p> <p>Objective DMS75 – <i>Provide appropriately scaled children’s playground facilities within residential development. Playground facilities shall be provided at a rate of 4 sq m per residential unit. All residential schemes in excess of 50 units shall incorporate playground facilities clearly delineated on the planning application drawings and demarcated and built, where feasible and appropriate, in advance of the sale of any units.</i></p>

	<p>Objective DMS76 – <i>Ensure that in the instance of an equipped playground being included as part of a specific facility, it shall occupy an area of no less than 0.02 hectares. A minimum of one piece of play equipment shall be provided for every 50 sq m of playground.</i></p> <p>The proposed development provides for open space which includes outdoor play opportunities for children in the form of a soft play area (i.e., playground) and play equipment which are accessible to all within the scheme and the wider community which is in accordance with objectives of the Development Plan:</p> <p>We are providing 104Nr pieces of play and recreational equipment will be provided for a range of age groups and abilities.</p> <p>(Note: as per FCC requirements: 4sq.m. of play area for every unit and 1Nr piece of equipment per 50sq.m. New dwellings proposed in FCC lands: 1,297 - 1297x4= 5,188 sq.m. play and recreation areas/ 50sq.m= 104Nr pieces of play and recreational equipment).</p> <p>For further information on the children’s playground facility and outdoor play equipment proposed as part of this Strategic Housing Development application, please refer to the associated drawings prepared by TBS Landscape Architects.</p>
Tree Policy	<p>Trees provide both valuable amenity and wildlife habitat. Fingal County Council sets out the Council’s policy for street tree planting, management and maintenance under the following objectives.</p> <p>Objective DMS77 – <i>Protect, preserve and ensure the effective management of trees and groups of trees.</i></p> <p>Objective DMS78 – <i>Ensure during the course of development, trees and hedgerows that are conditioned for retention are fully protected in accordance with ‘BS5837 (2012) Trees in relation to the Design, Demolition and Construction – Recommendations’ or as may be updated.</i></p> <p>Objective DMS79 – <i>Require the use of native planting where appropriate in new developments in consultation with the Council.</i></p> <p>Objective DMS83 – <i>Ensure roadside verges have a minimum width of 2.4 metres at locations where large trees are proposed and where necessary provide for constructed tree pits as part of the landscape specification. Road verges shall be a minimum of 1.2 metres wide at locations where small canopy trees are proposed.</i></p> <p>The retention of the existing trees and hedgerows has been a priority of the landscape & design strategy. It must be noted that a large proportion of the site was until recently, arable agricultural land. Much of the land is level and is historically devoid of trees. The existing hedgerows that are to be retained will be pruned, tidied, and replanted with native species where the hedgerow is of poorer quality. During the construction phase the existing trees and hedgerows that are to be retained will be protected from construction traffic, material</p>

	<p>storage, ground level changes and any other disturbances, in accordance with the recommendations set out in and detailed in the arborist's report.</p> <p>For further information on the tree retention proposed as part of this Strategic Housing Development application, please refer to the enclosed landscape drawings and reports prepared by TBS Landscape Architects and the Arborist's report for further information in this regard.</p>
<p>Private Open Space</p>	<p>The Development Plan requires that all residential units be they traditional type housing or apartments are to be provided with private open space.</p> <p>Objective DMS84 – <i>Ensure trees removed from residential areas are replaced, where appropriate, as soon as resources allow.</i></p> <p>Objective DMS85 – <i>Ensure private open spaces for all residential unit types are not unduly overshadowed.</i></p> <p>Objective DMS86 – <i>Ensure boundary treatment associated with private open spaces for all residential unit types is designed to protect residential amenity and visual amenity.</i></p> <p>For further information on the private open space proposed as part of this Strategic Housing Development application, please refer to the Housing Quality Assessment, the Architect and Urban Designer's Statement and associated drawings prepared by CCK Architects. Also, please refer to the enclosed landscape drawings and reports prepared by TBS Landscape Architects for further information in this regard.</p>
<p>Houses</p>	<p>The development plan requires that all dwelling houses are provided with private open space in accordance with Objective DMS87 and Objective DMS88.</p> <p>Objective DMS87 – <i>Ensure a minimum open space provision for dwelling houses (exclusive of car parking area) as follows:</i></p> <ul style="list-style-type: none"> • 3 bedroom houses or less to have a minimum of 60 sq m of private open space located behind the front building line of the house. • Houses with 4 or more bedrooms to have a minimum of 75 sq m of private open space located behind the front building line of the house. Narrow strips of open space to the side of houses shall not be included in the private open space calculations. <p>Objective DMS88 – <i>Allow a reduced standard of private open space for 1 and 2 bedroom townhouses only in circumstances where a particular design solution is required such as to develop small infill/corner sites. In no instance will the provision of less than 48 sq m of private open space be accepted per house.</i></p> <p>All homes have useable private outdoor space. Garden sizes for houses comply with the objective DMS87 of Fingal Development Plan. Apartments, maisonettes and duplex units in FCC and DCC comply with the minimum depth (1.5m), minimum privacy threshold and minimum areas set out in S.28 Planning</p>

	<p>Guidelines Design Standards for New Apartments (2018). Please refer to the HQA document for private areas of all units.</p> <p>For further information on the private open space proposed for the dwelling houses as part of this Strategic Housing Development application, please refer to the Housing Quality Assessment, the Architect and Urban Designer’s Statement and associated drawings prepared by CCK Architects. Also, please refer to the enclosed landscape drawings and reports prepared by TBS Landscape Architects for further information in this regard.</p>															
<p>Apartment and Duplex Units</p>	<p>The Development Plan requires that all apartment and duplex units contain private open space and communal amenity space.</p> <p>Objective DMS89 – <i>Require private balconies, roof terraces or winter gardens for all apartments and duplexes comply with or exceed the minimum standards set out in Table 12.6.</i></p> <p>Objective DMS90 – <i>Require balconies, ground floor private open space, roof terraces or winter gardens be suitably screened in a manner complimenting the design of the building so as to provide an adequate level of privacy and shelter for residents.</i></p> <p>Objective DMS91 – <i>Require communal amenity space within apartment developments, in the form of semiprivate zones such as secluded retreats and sitting out areas, complies with or exceeds the minimum standards set out in Table 12.6.</i></p> <p>Objective DMS92 – <i>Permit in appropriate layouts (e.g. courtyard layouts) the provision of a combination of private and semi-private open spaces.</i></p> <p>Table 12.6 - Open Space requirement for Apartment and Duplex Units</p> <table border="1" data-bbox="443 1301 1377 1462"> <thead> <tr> <th></th> <th>Private amenity space</th> <th>Communal amenity space</th> </tr> </thead> <tbody> <tr> <td>Studio</td> <td>4 sqm</td> <td>4 sqm</td> </tr> <tr> <td>One bed</td> <td>5 sqm</td> <td>5 sqm</td> </tr> <tr> <td>Two bed</td> <td>7 sqm</td> <td>7 sqm</td> </tr> <tr> <td>Three bed</td> <td>9 sqm</td> <td>9 sqm</td> </tr> </tbody> </table> <p>In this regard, it is evident that the private open space and communal amenity space to serve the proposed development complies with both the Fingal Development Plan 2017 – 2023 and the Design Standard for New Apartments (December 2020) requirements. For further details, please refer to the Housing Quality Assessment and Architect and Urban Designer’s Statement prepared by CCK Architects.</p>		Private amenity space	Communal amenity space	Studio	4 sqm	4 sqm	One bed	5 sqm	5 sqm	Two bed	7 sqm	7 sqm	Three bed	9 sqm	9 sqm
	Private amenity space	Communal amenity space														
Studio	4 sqm	4 sqm														
One bed	5 sqm	5 sqm														
Two bed	7 sqm	7 sqm														
Three bed	9 sqm	9 sqm														
<p>12.8 Community Infrastructure, Facilities and Services</p>																
<p>Childcare Facilities</p>	<p>All childcare facilities shall be provided in accordance with the ‘Childcare Facilities: Guidelines for Planning Authorities’ (DEHLG). The proposed SHD development will provide for 2 no. purpose-built childcare facility to accommodate approximately 165 children within the site with appropriate outdoor play space, drop off facilities, etc.</p>															

<p>Community Buildings</p>	<p>The Fingal Development Plan encourages the location and provision of community facilities is a pre-requisite to the creation and enhancement of viable, sustainable and successful local communities.</p> <p>Objective DMS93 – Any application for community facilities such as leisure facilities, sports grounds, playing fields, play areas, community halls, organisational meeting facilities, medical facilities, childcare facilities, new school provision and other community orientated developments, shall have regard to the following:</p> <ul style="list-style-type: none"> • Overall need in terms of necessity, deficiency, and opportunity to enhance or develop local or County facilities. • Practicalities of site in terms of site location relating to uses, impact on local amenities, desirability, and accessibility. • Conformity with the requirements of appropriate legislative guidelines. <p>A strong mix of activities is promoted by the scheme, with local retail and other commercial activity focussed on the town square, while community and office uses are located at Belcamp Hall in Phase 1. There is provision for a club house relating to the Class One Open Space.</p>
<p>12.10 Movement and Infrastructure</p>	
<p>Car Parking Standards</p>	<p>Objective DM113 of the Fingal County Development Plan states that the number of car parking spaces at new developments will be in accordance with the standards set out in Table 12.8.</p> <p>Objective DM113 – Limit the number of car parking spaces at places of work and education so as to minimise car-borne commuting. The number of car parking spaces at new developments will be in accordance with the standards set out in Table 12.8.</p> <p>Where demand can be managed by pricing, i.e. retail developments, the pricing should favour shoppers, who generally stay for shorter times, over employees, who generally stay for longer times.</p> <p>The car parking standards for both residential and non-residential land uses are set out in Table 12.8 of the Development Plan. The relevant standards are as follows:</p>

Table 12.8 - Car Parking Standards

Land Use	Criterion	Proposed	Notes	Category	Norm or Max
House - urban/suburban 1 or 2 bedrooms	Unit	1-2	Within curtilage	Residential	Norm
House - urban/suburban 3 or more bedrooms	Unit	2	Within curtilage	Residential	Norm
House - rural	Unit	2-3	Within curtilage	Residential	Norm
Apartment, townhouse 1 bedroom	Unit	1	Plus 1 visitor space per 5 units	Residential	Norm
Apartment, townhouse 2 bedrooms	Unit	1.5	Plus 1 visitor space per 5 units	Residential	Norm
Apartment, townhouse 3+ bedrooms	Unit	2	Plus 1 visitor space per 5 units	Residential	Norm
Sheltered housing	Unit	0.5	Plus 1 visitor space per 5 units	Residential	Norm
Caravan / mobile home park	Stand	1		Residential	Norm
Hotel, Motel, Motor Inn, Guest House	Bedroom	1		Residential	Norm
Pre-school facilities / creche	Classroom	0.5		Education	Maximum

Based on the car parking standard set out in the Fingal Development Plan, the total car parking required to serve the proposed development is below the standard set out in the Development Plan as it relates to the apartment and duplex element of the scheme. This is set out and justified in the Material Contravention Statement, which is prepared by Downey Planning and set out under separate cover.

Car Parking Required is show in the bellow (Calculated Using the Standards in Table 12.8 of the Development Plan, Source: Table 2 from Moylan's Car Parking Strategy Report):

Land Use Category	Parking Standard	No. of Units (FCC Lands Only)	Parking Requirement
House - urban/suburban 1 or 2 bedrooms	1-2	16	16-32
House - urban/suburban 3 or more bedrooms	2	457	914.0
Apartment, townhouse 1 bedroom	1, plus 1 visitor space per 5 units	253	303.6
Apartment, townhouse 2 bedrooms	1.5, plus 1 visitor space per 5 units	348	591.6
Apartment, townhouse 3+ bedrooms	2, plus 1 visitor space per 5 units	223	490.6
Pre-school facilities/crèche	0.5 per classroom	6 no. classrooms	3.0
Restaurant/Pub/Café	1 per 15m ²	479.0m ²	31.9
Retail	1 per 20m ²	2,315.5m ²	115.8
Total	-	-	2,466.5

Table 2 | Fingal Development Plan 2017-2023 Parking Standards

Carparking provision on the Fingal Lands is outlined with the table below:

		Description	No. of Units	No. of Spaces	Location	Ratio	
Fingal County Council	Houses	2-Bed	16	16	On-curtilage	1.0	
		3-Bed	385	770	On-curtilage	2.0	
		4-Bed	72	144	On-curtilage	2.0	
		Block 1.1	18	18	Curtilage/Under-Croft	1.0	
	Block 1.2	18	18	Curtilage/Under-Croft	1.0		
	Block 1.3	18	18	Curtilage/Under-Croft	1.0		
	Block 1.4	18	18	Curtilage/Under-Croft	1.0		
	Block 1.5	18	18	Curtilage/Under-Croft	1.0		
	Block 2.1	8	8	On-Street/Curtilage	1.0		
	Block 2.2	16	16	On-curtilage	1.0		
	Block 2.3	16	16	On-curtilage	1.0		
	Block 2.4	8	8	On-curtilage	1.0		
	Block 2.5	12	12	On-curtilage	1.0		
	Block 2.6	16	16	On-Street/Curtilage	1.0		
	Block 3.1	12	12	On-curtilage	1.0		
	Block 3.2	12	12	On-curtilage	1.0		
	Block 3.3	12	12	On-curtilage	1.0		
	Block 3.4	12	12	On-curtilage	1.0		
			Description	No. of Units	No. of Spaces	Location	Ratio
			Block 3.5	12	12	On-curtilage	1.0
Block 3.6			16	16	On-curtilage	1.0	
Block 3.7			16	16	On-curtilage	1.0	
Block 3.8			8	8	On-curtilage	1.0	
Block 3.9			8	8	On-curtilage	1.0	
Apartments		Block A	23	16	On-Street/Curtilage	0.7	
		Block B	23	16	On-Street/Curtilage	0.7	
		Block C	27	18	On-Street/Curtilage	0.7	
		Block D	42	12	On-Street	0.3	
		Block F	103	91	Under Podium/Basement	0.9	
		Block G	65	40	Under Podium	0.6	
		Block H	46	32	On-Street/Curtilage/Under-Croft	0.7	
		Block J	40	28	Curtilage/Under-Croft	0.7	
		Block L	46	32	On-Street/Curtilage/Under-Croft	0.7	
Block M		56	39	Curtilage/Under-Croft	0.7		
Blocks N & P		79	58	On-Street/Curtilage	0.7		
Commer- cial		Crèche	6 Classrooms	7	On-Street	-	
	Block F	1,163m ²	26	Under Podium	-		
	Town Square Environs	1,603m ²	35	On-Street	-		
FCC Subtotal			1,297	1,654	-	1.2	

The Development Plan requires that each 3-bed dwelling house be provided with 2 no. car parking spaces, which is being provided for in this scheme.

Further to the above, it is evident that the car parking provision is below the Development Plan requirements. This has been addressed within the Material Contravention Statement prepared by Downey and submitted as part of this application.

	<p>It's important to note that, the 'Design Standards for New Apartments – December 2020' does facilitate the relaxation of car parking standards for apartment developments where it states the following:</p> <p><i>“In suburban/urban locations served by public transport or close to town centres or employment areas and particularly for housing schemes with more than 45 dwellings per hectare net (18 per acre), planning authorities must consider a reduced overall car parking standard and apply an appropriate maximum car parking standard.”</i></p> <p>It is proposed to provide a total of 1,654 no. car parking spaces as part of the development proposal within the Fingal lands. The reduced provision of 1 car parking space per apartment / duplex unit reflects the location of the development in relation to existing public transport services. Parking will also be provided for visitors and for the Childcare Facility. This is in line with the Design Standards for New Apartments as outlined above and is considered adequate to serve the proposed development. For further information, please refer to the Architect and Urban Designer's Statement prepared by CCK Architects and Car Parking Strategy report prepared by Waterman Moylan Consulting Engineers for further details.</p>
<p>Bicycle Parking Standards</p>	<p>The proposed development provides considerable secure, covered bicycle parking for the apartment and duplex units as part of the development proposal (a total of 5,303 spaces in total).</p> <p>This ensures that future residents and visitors are encouraged to use sustainable modes of transportation. It is considered that the bicycle parking provision as part of the proposed development is consistent with Table 12.9 - Bicycle Parking Standards of the Development Plan.</p> <p>For further information on the bicycle parking as part of this Strategic Housing Development application, please refer to the Housing Quality Assessment, the Architect and Urban Designer's Statement and associated drawings prepared by CCK Architects.</p>
<p>Roads</p>	<p>The Fingal Development Plan states that the County is very reliant on its road infrastructure for intra-and-inter-county movement and access. For new developments, securing access onto the road network is a key issue and where new entrances are necessary, the relevant road design standards will be applied (DMRB in rural situations and DMURS in urban situations).</p> <p>Objective DMS126 – <i>Restrict unnecessary new accesses directly off Regional Roads. Ensure premature obsolescence of all county/local roads does not occur by avoiding excessive levels of individual entrances. Ensure that necessary new entrances are designed in accordance with DMRB or DMURS as appropriate, thereby avoiding the creation of traffic hazards.</i></p> <p>Objective DMS127 – <i>Presume against the removal of on-street parking spaces to facilitate the provision of vehicular entrances to single dwellings in</i></p>

	<p><i>predominantly residential areas where residents are largely reliant on on-street car parking spaces.</i></p> <p>Objective DMS128 – <i>Require developers to provide a Traffic Impact Assessment where new development will have a significant effect on travel demand and the capacity of the surrounding transport network.</i></p> <p>Each proposed access/egress point to a public road will have regard to the NRA DMBRAS and DRMB Road Geometry Standards. A Traffic Impact Assessment (TIA) and Road Safety Audit have been prepared for the development by Waterman Moylan Consulting Engineers, in accordance with the Development Plan’s requirements on traffic and transportation.</p>
<p>Waste Management</p>	<p>Objective DMS146 requires that all new large-scale residential and mixed-use developments include appropriate facilities for source segregation and collection of waste.</p> <p>Objective DMS146 – <i>Ensure all new large-scale residential and mixed-use developments include appropriate facilities for source segregation and collection of waste.</i></p> <p>The proposed development provides for convenient and well-designed proposals for the storage of refuse within the apartment and duplex element of the scheme. The storage of refuse is proposed at ground floor level in dedicated areas, ensuring that refuse storage and bins are in accordance with objectives of the Development Plan.</p> <p>In addition, the proposed development provides for a number of apartments and dwellings at ground floor level which have own door access in addition to the two storey houses.</p> <p>For further details, please refer to the Housing Quality Assessment and Architect and Urban Designer’s Statement prepared by CCK Architects.</p>
<p>12.11 Archaeological and Architectural Heritage</p>	
<p>Architectural Heritage (Protected Structures)</p>	<p>Under Objective DMS154 it is a requirement that all planning applications for works to a Protected Structure shall have regard to the information outlined in Table 12.10 of the Fingal County Development Plan 2017-2023:</p> <p>Objective DMS155 also recommends that where necessary, the Planning Authority shall require a detailed Architectural Heritage Impact Assessment for an application for works to a Protected Structure. This shall be carried out in accordance with Appendix B of the Department of the Arts Heritage and Gaeltacht’s Architectural Heritage Protection Guidelines for Planning Authorities.</p> <p>It is viewed that the proposed development is consistent with objective DMS154 and DMS155 of the Fingal Development Plan 2017-2023. It is important to note that no actual works are proposed to Belcamp Hall, the Walled Garden or Washington Monument as part of this application and they are located outside the applications red line boundary. For more information on this, please refer to</p>

	<p>the Architectural Assessment/ Conservation Report prepared by Sheehan & Barry Conservation Architectures for further details.</p>
<p>Designed Landscapes – Historic Gardens, Demesnes & Country Estates</p>	<p>It is a requirement under Objective DMS159 for all development proposals within ‘Historic Gardens, Demesnes & Country Estates’ to adhere to the following specific objective:</p> <p><i>“A Designed Landscape Appraisal should accompany any development proposal for an historic demesne and/or designed landscape, to include:</i></p> <ul style="list-style-type: none"> • <i>Identification and description of the original development, history, structures, features and boundaries of the designed landscape Ecological assessment, including identification of any protected habitats or species.</i> • <i>Evaluation of the significance of the historical landscape.</i> • <i>Determination of the carrying capacity of the lands which should not be exceeded, to be agreed with the Council.</i> • <i>Assessment of the development proposal and its impact on the designed landscape.</i> • <i>Recommendations for mitigation and management of the built and natural heritage.”</i> <p>It is viewed that the proposed development will adhere with objective DMS159 of the Fingal Development Plan 2017-2023. For more information on this, please refer to the Landscape Plan TBS Landscape Architects and Arboricultural Report.</p> <p>It must be noted that a large proportion of the site was until recently, arable agricultural land. This area is broadly level and appears historically to have been devoid of trees however, the perimeters of the site hold natural heritage and ecological value including some woodland, lakes and the Mayne River Valley. It is proposed that the woodland and Mayne River valley will form a significant new public amenity within the area, incorporating woodland walks within the Belcamp lands. Please refer to the documentation prepared by Sheehan & Barry Conservation Architects, TBS Landscape and The Tree File Ltd for details.</p>
<p>Biodiversity Conservation in Fingal</p>	<p>It is a specific objective of the Development Plan to ensure Screening for Appropriate Assessment and, where required, full Appropriate Assessment is carried out for all plans and projects in the County together with the necessary information to enable a fully informed assessment of impacts on biodiversity to be made.</p> <p>Objective DMS163 – <i>Ensure Screening for Appropriate Assessment and, where required, full Appropriate Assessment is carried out for all plans and projects in the County which, individually, or in combination with other plans and projects, are likely to have a significant direct or indirect impact on any European site or sites.</i></p> <p>Objective DMS164 – <i>Ensure that sufficient information is provided as part of development proposals to enable Screening for Appropriate Assessment to be undertaken and to enable a fully informed assessment of impacts on biodiversity to be made.</i></p>

Objective DMS165 – *Ensure that Natura Impact Statements (NIS) and any other ecological impact assessments submitted in support of proposals for development are carried out by appropriately qualified professionals and that any necessary survey work takes place in an appropriate season.*

Objective DMS166 – *Ensure planning applications for proposed developments likely to have significant direct or indirect impacts on any European Site or sites are accompanied by a Natura Impact Statement prepared in accordance with the Guidance issued by the Department of the Environment, Heritage and Local Government (Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, 2009)*

Objective DMS167 – *Ensure ecological impact assessment is carried out for any proposed development likely to have a significant impact on proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, Refuges for Fauna, Habitat Directive Annex I sites and Annex II species contained therein, or rare and threatened species including those species protected by law and their habitats. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment.*

Objective DMS168 – *Ensure that proposals for developments involving works to upstanding archaeological sites and features or works to the historic building stock include an assessment of the presence of bats in any such sites or structures and, where appropriate, ensure that suitable avoidance and/ or mitigation measures are proposed to protect bats in consultation with the National Parks and Wildlife Service.*

The proposed development has been screened for Appropriate Assessment in accordance Objective DMS163. OPENFIELD Ecological Services has prepared a report for Screening for Appropriate Assessment for the proposed development. The screening report has evaluated the proposed development at Malahide to determine whether or not significant negative impacts on Natura 2000 sites are likely to arise by virtue of its construction and use.

The screening report concludes that this proposed development is not located within or directly adjacent to any SAC or SPA but pathways do exist to a number of these areas. These assessments have shown the development, when assessed either alone or in combination with other plans and projects, taking into account best scientific information, will not result in adverse effects on the integrity of European sites.

In accordance with Objective DMS165, a Natura Impact Statement (NIS) has been prepared by OPENFIELD Ecological Services for the proposed development. The NIS contains an analysis of the proposed project and its relationship with areas designated under the Habitats and Birds Directives. Pathways exist between the development site and two such areas and these have been described in detail. Following this analysis, it is concluded that significant effects to the Baldoyle Bay SAC and SPA could not be ruled out. Specifically, this may arise from the impact to intertidal habitats and risk to SPA and SAC from

	<p>pollution during the construction phase. Arising from this assessment, mitigation has been proposed. With the implementation of these measures, adverse effects to the integrity of the SPA and SAC will not occur. This conclusion is based on best scientific knowledge.</p> <p>With regards Objective DMS167, an Environmental Impact Assessment has been prepared undertaken as part of the proposed application Please refer to the enclosed EIAR which assesses the overall development and is enclosed with this SHD application for the consideration of the Board.</p> <p>For further information in this regard, please refer to the Appropriate Assessment Screening Report Natura Impact Statement and the Biodiversity chapter of the EIAR prepared, by OPENFIELD Ecological Services. It is also noted that Brian Keeley has undertaken a bat and badger survey of the site which are included as part of this planning application to An Bord Pleanála.</p>
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4.3.9 Space for Play; A Play Policy for Fingal

“Space for Play; A Play Policy for Fingal”, the best practice policy guidelines developed by the Council's Parks & Green Infrastructure Division aims to provide a framework for the provision of safe, accessible, inclusive, natural, and engaging play spaces for all children and adolescents up to the age of 17. Fingal County Council currently manages a network of play spaces on Council managed land ranging from playgrounds of various scales in local and regional parks, to Multi Use Games Areas (MUGA), and skate parks. The Play Policy will provide the basis on which the current and future play provision throughout the County will be developed to the highest quality in line with international best practice.

Outlined in the policy guidelines, it is Fingal County Council's policy that Play facilities shall be provided at a rate of 4 sq. m per residential unit. All residential schemes in excess of 50 units shall incorporate play facilities clearly delineated on the planning application drawings and demarcated and built, where feasible and appropriate, in advance of the sale of any units.

In accordance with the foregoing policy, the playground provision is to be provided at a rate of 4 sqm per dwelling, which is 5,188 sqm within the Fingal lands. The Big Space Landscape Architects have developed a proposal to provide different play areas throughout the scheme. The play provision includes natural play, incidental play, formal playgrounds, callisthenics units and then play areas designed for the needs of very small children and their parents and guardians within the communal open space provided for apartments and duplex units.

In this regard, the proposed development will provide for a high-quality residential development on appropriately zoned lands within the existing development boundary of Belcamp & Clongriffin. The development will represent a sustainable form of residential development with existing connections to the urban centre where the site will form the sequential development of the town and will provide a total of 2,527 no. residential units (1,780 no. apartments, 473 no. houses & 274 no. duplex units) with 2 no. childcare facility and additional retail/commercial space that adhere with key development plan objectives and requirements of the Fingal County Development Plan 2017-2023.

Under the Fingal Development Plan 2017-2023, the lands are subject to the specific objectives under 'Objective BALGRIFFIN/BELCAMP 6' which seeks to prepare and/or implement a Belcamp LAP, as stated within *Objective BALGRIFFIN/BELCAMP 6*

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.

However, the Development Plan has another specific objective, '**Objective PM41**', which aims to,

"Encourage increased densities at appropriate locations whilst ensuring that the quality of place, residential accommodation and amenities for either existing or future residents are not compromised."

Please also refer to the Material Contravention Statement prepared by Downey Planning for further information in this regard.

5.0 MATERIAL CONTRAVENTION OF DEVELOPMENT PLAN

A Material Contravention Statement has been prepared by Downey Planning and is submitted under separate cover, pursuant to Section 9 of the Planning and Development (Housing) and Residential Tenancies Act 2016. The Material Contravention Statements outlines the justification of the proposed development on lands at Belcamp Hall, in instances where it may be considered that it materially contravenes objectives of the Fingal County Development Plan 2017-2023 and Dublin City Development Plan 2016-2022 and the Clongriffin-Belmayne Local Area Plan 2012-2018 (as extended to 2022). It is respectfully submitted that the justification set out within the Material Contravention Statement clearly demonstrates that the proposed development at Belcamp Hall should be considered for development in the absence of a Local Area Plan and for increased density and height due to the application sites location within appropriately zoned lands, in a highly accessible location within the development boundary of Belcamp/Clongriffin and the policies and objectives set out within the Section 28 Guidelines.

6.0 CONCLUSION

This Statement demonstrates that the proposed development is in compliance with relevant national, regional and local planning policy. The proposed development is being submitted in the absence of a statutory Local Area Plan being adopted for the Belcamp Hall lands under Objective BALGRIFFIN/BELCAMP 6 of the Fingal County Development Plan and as such the proposed development contravenes materially the Development Plan relating to the area. In this regard, it is considered that restricting the development of the subject lands in the absence of a Local Area Plan is a direct contravention of National Policy which promotes increased housing supply, increased densities and increased heights at appropriate locations. It is respectfully submitted that the justification set out above clearly demonstrates that the proposed Strategic Housing Development on lands at Belcamp Hall, should be considered for development noting that the lands subject to this SHD

are within one land ownership and represent the next landbank in the northern city fringe to be development.

The proposed development contravenes two specific objectives for the masterplan noting that low density development and restricted heights are elements to be contained within such a masterplan. However, the location of the subject site on appropriately zoned lands in an accessible suburban location within Malahide's town development boundary, and the policies and objectives set out within the Section 28 Guidelines is such that medium density (a net density of 67.8 units per ha) and a height of 1-9 storeys is in accordance with national planning policy. For further information in this regard, please refer to the Material Contravention Statement which is submitted as part of this Strategic Housing Development Application.

It is submitted that the proposed development will provide an appropriate form of development on the subject lands that are zoned 'RA-Residential Area', a zoning designation which permits in principle residential use. The proposed development will provide for an effective, efficient, sustainable use of what is a residential zoned lands site in a highly accessible location which is well served by public transport (Dublin Bus Stop No. 3645).

The nature, form and extent of the proposed development has been informed and guided by preapplication consultation with both An Bord Pleanála and the planning authority's internal departments prior to the finalisation of this Strategic Housing Development application.

In light of the above, it is respectfully submitted that the proposed development is consistent with the proper planning and sustainable development of the area in which it is located as expressed in national, regional and local planning policy and Guidelines issued under Section 28 of the Planning and Development, 2000 (as amended), and as such, it is considered that the proposed development at Belcamp represents a high-quality Strategic Housing Development proposal which is now being submitted as part of this Strategic Housing Development application to An Bord Pleanála.