



**HUGHES**  
**PLANNING**  
& DEVELOPMENT CONSULTANTS

# TOWN PLANNING SUBMISSION

DRAFT FINGAL COUNTY  
DEVELOPMENT PLAN 2023-2029

Lands at Beech Park House, Clonsilla, Dublin 15

FINGAL COUNTY COUNCIL

MAY 2022

SUBMITTED ON BEHALF OF:  
Neil McDermott,

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## 1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2 have been instructed by our client, Neil McDermott, to make a submission on the proposed Draft Fingal Development Plan 2023-2029, with respect to lands at Beech Park House, Clonsilla, Dublin 15.

The submission lands comprise some 7.5 hectares (c. 18.5 acres) and are generally located south and east of the Clonsilla commuter railway line and north of the R121 regional road in the south western corner of Fingal County Council's administrative area. The submission lands form part of the overall Beech Park House Estate, comprising Beech Park House and Lodge (Record of Protected Structures RPS No. 710), associated Courtyard (Record of Protected Structures RPS No. 709), walled garden, extensive wooded area to the east and open grassed area to the south. The site boundaries to the south and west are also heavily tree-lined.

This submission is made in response to a public notice dated 24th February 2022, inviting specific policy submissions or observations regarding the contents of the Draft Fingal Development Plan 2023-2029, up until 12th May 2022.

Of relevance to the submission lands is Objective EEO48 – Integrated Tourism Complexes which includes Beech Park House. This objective, included in Section 7.5.2.1 has regard to the development of demesnes within Fingal County which are capable of facilitating tourism development while retaining their landscape types. This objective states the following:

*'Facilitate, where appropriate, (those complexes as listed in 7.5.2.1 Abbeyville, Dunsoghly Castle, Roganstown, Tyrrelstown House, Hampton Demesne, Beech Park House), the conversion of former demesnes and estates and their outbuildings into integrated tourist, leisure and recreational complex type developments subject to architectural conservation best practice and proper planning and sustainable development, having regard to protecting the demesne type landscape and existing natural features, and providing improved pedestrian access, where appropriate.'*

This current submission, made on behalf of the landowner, Neil McDermott, is seeking to broaden Objective EE048 to incorporate a broader range of uses within Beech Park House to provide additional ancillary buildings to facilitate the long term preservation of the demesne and in particular to provide for a development that is suitable to the character and nature of the lands. The long-term vision for the subject lands is to provide a recuperation/rejuvenation facility within the house and outbuildings and within additional accommodation appropriately designed and sited within the demesne lands. This facility will offer alternative treatments, health education and a clean lifestyle in a peaceful setting to guests from Ireland and abroad.

The subject lands provide an ideal environment for living with nature with the parkland setting of the demesne providing a sense of calm and peace for healing. It is envisaged that in addition to the re-use of the existing house and courtyard buildings as a recuperation centre, a short stay hotel could be provided to the east of the property/ lands which would also facilitate people who want to stay for longer periods of treatment at the recuperation/rejuvenation centre with a number of houses or lodges located sensitively with respect protected structures and landscapes to encourage interaction with nature/stillness. It is considered that the subject lands are ideally suited to this vision noting the vision provides for the sensitive re-use of the existing Protected Structures and the preservation of the attendant grounds.

It is also considered that Objective EE048 should be broadened to facilitate additional accommodation to the existing buildings. The Draft Plan does not appear to provide for the provision of additional development as part of the development of Integrated Tourism Complexes, noting that tourism related residential shall be contained within existing buildings. We consider this assertion to be overly restrictive and will have a significant impact on the economic viability of any forthcoming integrated scheme on the lands. Whilst our client is wholly supportive of the necessity to ensure that Beech Park House and its associated outbuildings of merit are refurbished and incorporated as part of any such scheme, the provision of additional development is considered critical to the success of same. This could comprise a small development of dwellings and hotel accommodation that will support the re-use and rehabilitation of the wider demesne lands at Beech Park House. To this end we would highlight the merits of providing

additional development as part of an integrated rejuvenation/recuperation complex to financially support the long term use of the existing buildings on site and the demesne lands.

In order to realise this vision and ensure the proactive and long term use and preservation of Beech Park House, this submission makes the following request to amend Objective EEO48 and Section 7.5.2.1 of the Draft Development Plan:

- That the wording of Objective EEO48 and the definition of '*Integrated Tourism Complexes*' as set out in Section 7.5.2.1 of the Draft Fingal Development Plan 2023-2029 be amended to read as follows (additional text shown in bold and underlined):

*'Facilitate, where appropriate, (those complexes as listed in 7.5.2.1 Abbeyville, Dunsoghly Castle, Roganstown, Tyrrelstown House, Hampton Demesne, Beech Park House), the conversion of former demesnes and estates and their outbuildings into integrated tourist, leisure, recreational and **rejuvenation/recuperation** complex type developments subject to architectural conservation best practice and proper planning and sustainable development, having regard to protecting the demesne type landscape and existing natural features, and providing improved pedestrian access, where appropriate **and the provision of a limited number of ancillary buildings/lodges for tourism/ancillary accommodation grouped in a communal configuration**.'*

### 7.5.2.1 Integrated Tourism Complexes

*The Council will continue to encourage the development of integrated tourism/leisure/recreational complexes in demesne type landscapes in the County, where such uses are consistent with the retention of such landscapes. The conservation of these assets into the future is essential and the Council recognises the need for the appropriate sustainable reuse of these buildings. An integrated tourism/leisure/recreational complex should include a number of the following:*

- *Hotel and associated facilities, conference centre, golf course, equestrian centre, **recuperation complex**, trekking centre, fitness centre, indoor/outdoor water facility, fishing facility, museums, nature trails, walking routes and associated facilities.*
- ***Where appropriate, it may also include a limited number of residential dwellings, preferably grouped in a courtyard type configuration,** as well as leisure retail which is ancillary to the main tourist attraction. **The development of any such facility shall incorporate the refurbishment and re-use of existing buildings for related uses.***

#### **\*(New text in bold underlined text)**

This submission is also requesting that the definition of an Integrated Complex at Beech Park House that is currently set out within the Fingal Development Plan 2017 – 2023 is reinstated within the Draft Fingal Development Plan 2023-2029 under Section 7.5.2.1. This definition is as follows:

***Beech Park House, located to the south-west of Clonsilla village contains the Protected Structure Nos.709 and 710 which comprise the 'former outbuildings of Beech Park house' and the 'house, lodge and gates'. Consideration will be given to the provision of an integrated tourism and recuperative centre at Beech Park House. The nature and extent of the facilities shall be determined primarily by the need to conserve the house, lodge and courtyard and their surroundings, which are of architectural importance, and the special landscape character and heritage features of the land.***

The rationale for the afore referenced request will be set out in detail in the proceeding sections of this report. We request that the recommendations of this submission be given full consideration in the preparation of the forthcoming Fingal Development Plan 2023-2029.

With the inclusion of the proposed amendment to Objective EEO48 and Section 7.5.2.1 of the Draft Fingal Development Plan 2023-2029, we note that the Council recognises the potential use of Beech Park House as an integrated tourism and recuperative centre, in not only ensuring the long term integrity of Beech Park House, a Protected Structure, but also ensuring the character and landscape

features of the surrounding lands can be conserved and utilised for leisure and recreational use by the wider community.

Our client acknowledges the Council's support of an objective to allow an integrated tourism and recuperation complex on the lands in the current Development Plan. However, our client has concerns that the objective appears limited and restrictive in terms of how he envisages the estate could be utilised and evolved to create a high-quality tourism and recuperation offer at the interface with existing and future areas of public open space, including Shackleton Gardens, and also central to an expanding urban front, noting Hansfield SDZ to the north, Kellystown LAP to the east and Barnhill LAP to the west.

The submission lands comprise c. 7.5 hectares (c. 18.5 acres) of mature trees, hedges and woodlands. The existing house, a protected structure, is in excellent structural condition, maintained to the highest standard by our client and his family. The gardens are taken care of with full time gardeners. The localised context of the site makes it the ideal candidate for exploring a unique tourism offer. Given the locational context of the lands within the Metropolitan Area, there is a real opportunity to exploit, with a sensitive approach, the potential of the land for tourism, leisure and recreation, while ensuring the long term integrity of Beechpark House, a Protected Structure.

In this regard, and in support of the submission, Mola Architects, were commissioned to produce a concept proposal for conversion of Beechpark House to a Rejuvenation Centre and provide ancillary accommodation on the grounds. The concept proposal is included in Appendix A of this submission and further discussed under 'Submission Request'.

## **2.0 Submission Lands**

The submission lands comprise an area of approximately 7.5 hectares (c. 18.5 acres), and consist of Beech Park House and lands. Beech Park House is a detached seven-bay single-storey over basement house, built c.1820, with three projecting central bays and balustrade surrounding basement. The lands are located south and east of the Clonsilla commuter railway line, north of the Luttrellstown Castle Resort, and west of Fingal County Council owned Beech Park playground and recreational area.

The submission lands form part of the overall Beech Park House Estate, comprising Beech Park House and Lodge (Record of Protected Structures RPS No. 710), associated Courtyard (Record of Protected Structures RPS No. 709), walled garden, extensive wooded area to the east and open grassed area to the south. The site boundaries to the south and west are also heavily tree-lined. The Beech Park House and environs currently comprise 6 no. residential units, namely Beech Park House itself, the Gate Lodge to the south, the cottage dwelling west of the walled garden and three dwellings within the Courtyard.



Figure 1.0 Layout of submission lands.



Figure 2.0 Locational context of the submission lands (outlined in red).

### 3.0 Planning Site History

**Reg. Ref. F06A/1367** Planning permission granted by Fingal County 4<sup>th</sup> January 2007 for the provision of Class 1 public open space at lands known as the Shackleton Gardens, Beechpark, Clonsilla, Dublin 15, in lieu of the provision of Class 1 public open space at Barberstown, Clonsilla included as part of previously permitted residential development on lands at (i) Phibblestown, Ravenswood,

Stonebridge Estate, Allendale House, Dublin 15, (Allendale) (Reg. Ref. F01A/1270) and (ii) on lands at the townland of Clonnsilla, north of Aldermere and Windermere, west of Stonebridge, south of permitted Ongar/Snugboro (Allendale Square) (Reg. Ref. F02A/0912).

It is noteworthy that on foot of planning permission granted to Menolly Homes under Reg. Ref. F06A/1367, the ownership of 1.6 hectares (4.122 acres) of land within the Beech Park House Estate was transferred to Fingal County Council in lieu of the provision of Class 1 Public Open Space required for a residential development previously approved under Reg. Ref. F01A/1270 and F02A/0912. The area of land transferred for the purposes of Public Open Space comprised the walled garden, known as Shackleton Gardens, immediately north of the submission lands (shown in Figure 2.0), and extending along the southern edge of the allotment gardens (known as Beech Park Allotments).

The transfer of this area of land within the estate for public open space and thus the enjoyment of the walled garden by the public further complements the public open space offering in the area which includes 1.2 hectares (2.97 acres) of land in the south east corner of the Beech Park Estate, adjacent to the R121, zoned Open Space, previously secured for public open space by Fingal County Council.

#### **4.0 Fingal Development Plan 2017-2023**

The Fingal Development Plan 2017-2023 is the statutory framework which guides the use and development of the submission lands over the plan period, and seeks to develop and improve, in a sustainable manner, the social, economic, environmental and cultural assets of the County.

The Development Plan states the following in relation to Integrated Tourism Complexes:

The Council will encourage the development of integrated tourism/leisure/recreational complexes in demesne type landscapes where such uses are consistent with the retention of such landscapes. The conservation of these assets into the future is essential and the Council recognises the need for the appropriate sustainable reuse of the buildings. An integrated tourism/leisure/recreational complex should include a number of the following:

- Hotel and associated facilities, conference centre, golf course, equestrian centre, trekking centre, fitness centre, indoor/outdoor water facility, fishing facility, museums, nature trails, walking routes and associated facilities.
- It may also include tourist related residential and leisure retail which is ancillary to the main tourist attraction. The tourist related residential development shall be contained within the existing buildings and retained in single company ownership and shall not be sold off individually.

An overall planning application will be required for the entire complex which will include proposals, where appropriate, for:

- The preservation/conservation of natural amenities on the site,
- The preservation/conservation of the heritage structures on the site,
- The retention of the open nature of the lands,
- Significant and intensive landscaping of the site.

With regards to Beech Park House the Development Plan states the following:

*Beech Park House, located to the south-west of Clonsilla village contains the Protected Structure Nos.709 and 710 which comprise the 'former outbuildings of Beech Park house' and the 'house, lodge and gates'. Consideration will be given to an integrated tourism and recuperative centre at Beech Park House. The nature and extent of the facilities shall be determined primarily by the need to conserve the house, lodge and courtyard and their surroundings, which are of major architectural importance, and the special landscape character and heritage features of the land.*

Therefore, it is noted that the current development plan considers and integrated tourism and recuperative centre to be an appropriate development at Beech Park House subject to the conservation of the existing buildings on site.

## 5.0 Draft Fingal Development Plan 2023-2029

Under the Draft Fingal Development Plan 2023-2029 the lands are located outside of any urban settlement and are therefore classed as being rural in nature. The site is covered by two different zoning objectives in the draft plan. The vast majority of the land is zoned 'HA' (High Amenity), the objective of which is to *'Protect and enhance high amenity areas'*. The vision for this zone is to:

*'Protect these highly sensitive and scenic locations from inappropriate development and reinforce their character, distinctiveness and sense of place. In recognition of the amenity potential of these areas opportunities to increase public access will be explored.'*

A small portion of the land to the east boundary is zoned 'OS' (Open Space), the objective of which is to *'Preserve and provide for open space and recreational amenities.'* The vision for this zone is 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.’*

An extract from the Development Plan Zoning Map No. 13 is shown in Figure 3.0 below, with the submission lands outlined in red.

The zoning map also shows other designations in the area, including an 'Architectural Conservation Area' abutting the submission lands along the site's southern boundary, which comprises Luttrellstown Castle Resort. There are two structures on the submission lands which are included on Fingal County Council's Record of Protected Structures, namely The Courtyard (RPS Ref. 709) and Beech Park House (RPS No. 710) including lodge and gates adjacent to the R121 to the south.

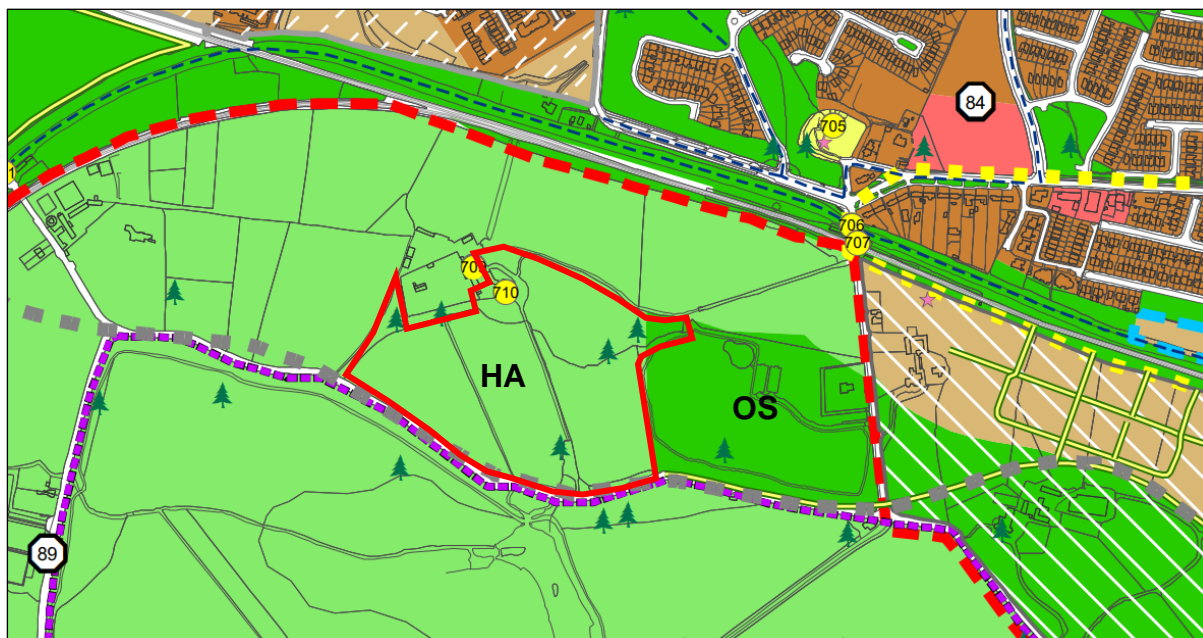


Figure 3.0 Extract from Zoning Map No. 13 in the Draft Fingal Development Plan 2023-2029, showing the submission lands outlined in red

## 5.1 Draft Development Plan Policy

The Draft Development Plan policies which support the concept proposal are set out and discussed as follows:

## Tourism

Section 7.5.2 – Tourism of the Draft Development Plan highlights the importance that tourism plays in the local and overall economy of Fingal. Further to this, the Plan states that:

*‘Fingal’s Tourism sector is characterised by large numbers of SMEs, with 800 businesses providing accommodation and catering services. Guest accommodation supports an estimated 3,000 full time job equivalents and the catering sector provides a further 2,000 jobs’.*

It is therefore submitted that the tourism sector is largely important to Fingal’s economic development and ensuring that this sector can continue to grow in a sustainable manner is vital to support the County’s economic growth. Fingal’s rich and diverse natural, cultural and built heritage, can be vulnerable and economic development proposals that affect the County’s heritage need to be sensitively designed and undertaken. Such development needs to respect the visual amenity of natural landscapes through appropriately scaled development which has a positive impact on local areas and does not significantly impact on the natural environment.

Relevant development plan policy includes:

- |                        |   |
|------------------------|---|
| <b>Policy EEP21</b>    | <i>Facilitate and promote the development of tourism in the County and ensure that the appropriate policies, objectives and measures identified in the Tourism Statement of Strategy and Work Programme 2017–2022 are aligned with and supported by policies and objectives in the Draft Plan.</i>  |
| <b>Policy EEP22</b>    | <i>Support development of tourism infrastructure, visitor attractions and supporting facilities at appropriate locations in the County in a manner that does not have an adverse impact on the receiving areas and the receiving environment.</i>   |
| <b>Objective EEO41</b> | <i>Engage and collaborate with key stakeholders, relevant agencies, sectoral representatives and local communities to develop the tourism sector in Fingal and to ensure that the economic potential of the tourism sector is secured for the benefit of the local economy.</i>   |
| <b>Objective EEO44</b> | <i>Ensure the economic benefits associated with promoting the County’s natural, cultural and built heritage are balanced with due consideration for their conservation and protection.</i>  |
| <b>Objective EEO48</b> | <i>Facilitate, where appropriate, (those complexes as listed in 7.5.2.1 Abbeyville, Dunsoghly Castle, Roganstown, Tyrrelstown House, Hampton Demesne, Beech Park House), the conversion of former demesnes and estates and their outbuildings into integrated tourist, leisure and recreational complex type developments subject to architectural conservation best practice and proper planning and sustainable development, having regard to protecting the demesne type landscape and existing natural features, and providing improved pedestrian access, where appropriate.</i> |
| <b>Objective EEO49</b> | <i>Support sustainable tourism initiatives which develop the tourist potential of the rural area while recognising and enhancing the quality and values of the rural area.</i>  |

The proposal to convert Beech Park House into a rejuvenation centre and to provide a number of ancillary accommodation units, sensitively located and designed, presents an opportunity to further enhance the tourist offering within Fingal. We would contend that Beech Park House and the associated lands are of a character, maturity and location, which make them conducive to absorbing ancillary buildings to support the use of the dwelling as a recuperative centre.

## Landscape

The Council is committed to further increasing an integrated and coherent green infrastructure network, with an emphasis on retaining existing green spaces located on the urban fringe and adjacent to countryside areas. Preservation of parks with historic landscape character and architectural heritage

that offer a current recreational use, such as allotments and community gardens are of particular interest in serving the local community in this regard. Such sites contained within the following zoned areas are given priority:

- ◆ *Special Amenity Areas on Howth Head and the Liffey Valley*
- ◆ *High Amenity Areas*
- ◆ *Highly Sensitive Landscapes*
- ◆ *County Geological Sites*
- ◆ *Public Beaches*

**Policy GINHP9**      *Ensure Green Infrastructure provision responds to and reflects landscape character including historic landscape character, conserving, enhancing and augmenting the existing landscapes and townscapes of Fingal which contribute to a distinctive sense of place.*

Beech Park House is located in a 'High Amenity' zone, and is set within 7.5 hectares (c. 18.5 acres) of lands with established historic landscape character. It is noteworthy that land within the Beech Park House Estate, including Shackleton Gardens, are to be transferred to Fingal County Council in lieu of the provision of Class 1 Public Open Space required for a residential development previously approved under Reg. Ref. F01A/1270 and F02A/0912.

### **Protected Structures**

It is noted by the Council that Fingal County has a diverse building stock with a range of uses, positively contributing to the architectural heritage of the County. These structures assist in placemaking and ensure that the county retains its architectural interest and offering of structures for appropriate re-use with current needs. The Draft Development Plan highlights a number of guiding principles to ensure the conservation of these structures:

- Minimum Intervention;
- Regular Maintenance;
- Repair Rather Than Replace;
- Honesty Of Repairs And Alterations;
- Use Of Appropriate Materials And Methods;
- Respect And Retain Earlier Alterations Of Interest; and
- Managed Sustainable Change
- Reversibility Of Interventions

Relevant Draft Development Plan policy includes:

**Policy HCAP8**      *Ensure the conservation, management, protection and enhancement of the architectural heritage of Fingal through the designation of Protected Structures and Architectural Conservation Areas, the safeguarding of designed landscapes and historic gardens, and the recognition of structures and elements with no specific statutory designation that contribute positively to the vernacular, industrial, maritime or 20th century heritage of the County*

**Policy HCAP10**      *Continue to support and encourage the sympathetic and appropriate reuse, rehabilitation and retention of protected structures and historic buildings ensuring the special interest, character and setting of the building or structure is preserved.*

In considering the use of Beech Park House as an integrated tourism and recuperative centre, it is submitted that the proposal appropriately reuses the existing protected structure to facilitate further development at the submission lands.

As demonstrated in the materials provided by MOLA Architects, the proposed scheme for the submission lands would be of a high architectural quality and design, which, even though still at design

stage, has been produced as a result of a significant amount of research, with particular regard to the site context and previously submitted proposals.

In this instance, it is submitted that the proposed inclusion to permit a limited number of ancillary buildings, in the style of tourist accommodation lodges ancillary to the reuse of the protected structure, would be easily absorbed within the confines of the established lands, without injuring the expansive character of the landscape, or being visually obtrusive to the character of the existing protected structure. It is also submitted that the inclusion for the provision of ancillary accommodation will not restrict the use of the lands in any capacity in terms of recreation or leisure for the wider community.

## 5.2 Land Use Zoning

As outlined in the previous section, the majority of the submission lands are zoned 'HA' High Amenity in the Draft Development Plan, with the objective being to '*Protect and enhance high amenity areas*'.

The vision for this zone is as to:

*'Protect these highly sensitive and scenic locations from inappropriate development and reinforce their character, distinctiveness and sense of place. In recognition of the amenity potential of these areas opportunities to increase public access will be explored.'*

Under the High Amenity Zone, the following uses are 'Permitted in Principle':

*Agri-Tourism, Bed and Breakfast<sup>3</sup>, Boarding Kennels<sup>3</sup>, Burial Grounds<sup>29</sup>, Campsite<sup>25</sup>, Childcare Facilities<sup>3</sup>, Farm Shop<sup>20</sup>, Guest House<sup>3</sup>, Health Practitioner<sup>3</sup>, **Holiday Home/ Apartments<sup>7</sup>**, Office Ancillary to Permitted Use, Open Space, Residential<sup>4</sup>, Restaurant/Café<sup>13</sup>*

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*

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

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*

The concept proposal as designed by MOLA Architects, comprises a recuperative centre located on lands within the curtilage of Beech Park House, a protected structure, and a number of lodges/pods to be used as accommodation ancillary to that use. It is envisaged that the landscaped grounds within the curtilage of the house would provide ancillary amenity space to the recuperative centre and associated accommodate units. The use of the grounds for this purpose would be further complemented by the public lands to the north and east, which comprises Shackleton Gardens to the north and 'Open Space' zoned public park to the east.

Based on the concept proposal, the use of Beech Park House and its grounds for tourism related recuperative centre, would, in the first instance, support the vision of the High Amenity zone, which, in recognition of the amenity potential of these areas, seeks to increase public access.

However, we note that under the use matrix for the High Amenity zone, Holiday Home / Apartments, for example, are only permitted where the development involves conversion of a protected structure. The use of the land for a tourism related recuperative centre / spa retreat is neither 'Permitted in Principle' nor 'Not Permitted' therefore an application for planning permission would be assessed on its own merits with regards to how it contributes to achieving the objectives and vision of the zone.

Our client views the proposed objective for the land as a real opportunity to deliver a high-quality use on the lands, however it is still considered that the zoning objective as set out under Objective EEO48 of the Draft Development Plan limits the potential development of the site to the point whereby a tourist development would not be viable. It is therefore requested that the text included with this objective is

altered to improve potential development at sites such as the submission lands, ensuring that development on demesne character type lands can be facilitate providing a high-quality amenity.

The additional wording suggested for the objective would allow our client a degree of certainty with respect to the parameters of use and development on the site, encouraging further commitment to deliver a high-quality product. The concept development would ensure the continued use and preservation of a protected structure, while the use of the grounds as ancillary amenity will link through with the public open space adjoining to the north and east.

## 6.0 Submission Request

The proposed request with which this submission pertains to seeks to provide additional text to the existing objective which pays specific regard to the submission lands. This request is made with regard to the proposed Development Plan Objective EEO48 and Section 7.5.2.1:

- That the wording of Proposed Amendment to Objective EEO48 contained in Section 7.5.2.1 ‘*Integrated Tourism Complexes*’ of the Draft Fingal Development Plan 2023-2029 be amended to read as follows (additional text shown in bold and underlined):

*‘Facilitate, where appropriate, (those complexes as listed in 7.5.2.1 Abbeyville, Dunsoghly Castle, Roganstown, Tyrrelstown House, Hampton Demesne, Beech Park House), the conversion of former demesnes and estates and their outbuildings into integrated tourist, leisure, recreational and **rejuvenation/recuperation** complex type developments subject to architectural conservation best practice and proper planning and sustainable development, having regard to protecting the demesne type landscape and existing natural features, and providing improved pedestrian access, where appropriate **and the provision of a limited number of ancillary buildings/lodges for tourism/ancillary accommodation grouped in a communal configuration**’.*

### 7.5.2.1 Integrated Tourism Complexes

*The Council will continue to encourage the development of integrated tourism/leisure/recreational complexes in demesne type landscapes in the County, where such uses are consistent with the retention of such landscapes. The conservation of these assets into the future is essential and the Council recognises the need for the appropriate sustainable reuse of these buildings. An integrated tourism/leisure/recreational complex should include a number of the following:*

- *Hotel and associated facilities, conference centre, golf course, equestrian centre, **rejuvenation/recuperation complex**, trekking centre, fitness centre, indoor/outdoor water facility, fishing facility, museums, nature trails, walking routes and associated facilities.*
- ***Where appropriate, it may also include a limited number of residential dwellings, preferably grouped in a courtyard type configuration,** as well as leisure retail which is ancillary to the main tourist attraction. **The development of any such facility shall incorporate the refurbishment and re-use of existing buildings for related uses.***

The amended text included with this submission is shown in bold and underlined. This submission is also requesting that the definition for Beech Park House as an integrated tourism and recuperative centre that is currently set out within the Fingal Development Plan 2017 – 2023 is reinstated within the Draft Fingal Development Plan 2023-2029. This definition is as follows:

***Beech Park House Beech Park House, located to the south-west of Clonsilla village contains the Protected Structure Nos.709 and 710 which comprise the ‘former outbuildings of Beech Park house’ and the ‘house, lodge and gates’. Consideration will be given to the provision of an integrated tourism and recuperative centre at Beech Park House. The nature and extent of the facilities shall be determined primarily by the need to conserve the house, lodge and courtyard and their surroundings, which are of architectural importance, and the special landscape character and heritage features of the land.***

The rationale for the submission request is that the landowner is keen to further the concept proposal for a tourism and recuperation/rejuvenation centre use at Beech Park House, and is conscious of the need for ancillary buildings, most notably the need for tourist accommodation, in ensuring the long-term commercial viability of such a use. In this regard, the landowner is mindful of the site being predominantly in 'High Amenity' zone and the need to protect the integrity of Beech Park House and conserve its surrounding landscape.

Plans and particulars prepared by MOLA Architecture included with this Development Plan submission detail a potential proposal for this site which involves using the site for a rejuvenation and health centre that retains the demesne character type of the lands. It is envisaged that the submission lands can facilitate a number of additional units/pods without detracting from the natural landscape character of the lands or proposing development which could be considered incompatible with the High Amenity zoning of these lands. The lands have the potential to provide for lodges on lands which are currently used for agriculture and where pods are proposed, these can be placed throughout the existing trees on site, providing for an arboretum which protects the biodiversity of the lands.

The conversion of Beech Park House and for the provision of buildings to serve as ancillary accommodation units for tourist accommodation have been designed to show how ancillary accommodation could be delivered in a form that responds to the sensitivity of the site and area context, as well as being strategically located in an optimal location that allows for the buildings to be absorbed within the site without being injurious to the character or visual amenity of the established landscape.

The concept conceived by MOLA Architects comprises accommodation units to be clustered together along an existing laneway on the eastern edge of the site, as shown in the concept site layout plan for the entire site, in an arrangement reminiscent of the vernacular Irish row cottages, a typology found throughout Ireland and to provide for pod units throughout the existing cluster of trees on site.

The images included in Figure 4.0 and 5.0 are an example of potential development of the subject lands which our client is seeking to create. Any units/lodges proposed on the submission lands would be small-scale and configured so as to be minor in visual impact. The accommodation, which would be ancillary to the proposed rejuvenation centre in the existing house, a protected structure, would be located close to the western edge of the site, allowing a natural buffer to the protected structure and surrounding gardens while also making efficient use of an existing laneway, allowing convenient access to and from the rejuvenation centre and also Shackleton Gardens.



Figure 4.0 Site plan illustrating potential development for submission lands.



Figure 5.0 Movement and access image of potential development for submission lands.

The potential development capacity of the submission lands to facilitate a rejuvenation centre, short stay hotel and a number of lodges/pods situated throughout the lands and ancillary to the existing buildings on these lands are considered to present a proposal which makes appropriate use demesne type lands. The development of these lands is considered to be acceptable if done in a manner which

does not propose a major visual impact on the existing protected structure on site. Further to this, minor development of these lands is considered to facilitate economic development in the County and provide for a use which appropriately utilises the potential development capacity of the lands in a manner which is more suitable than that as present.

This submission is also requesting that the definition for an Integrated Complex at Beech Park House that is currently set out within the Fingal Development Plan 2017 – 2023 is reinstated within the Draft Fingal Development Plan 2023-2029. This definition is as follows:

*Beech Park House Beech Park House, located to the south-west of Clonsilla village contains the Protected Structure Nos. 709 and 710 which comprise the 'former outbuildings of Beech Park house' and the 'house, lodge and gates'. **Consideration will be given to an integrated tourism and recuperative centre at Beech Park House.** The nature and extent of the facilities shall be determined primarily by the need to conserve the house, lodge and courtyard and their surroundings, which are of architectural importance, and the special landscape character and heritage features of the land.*

The provision of a rejuvenation centre at these lands proposes a unique experience for visitors of the demesne, of which, is not currently available for use thus facilitating the economic development of the area which still respects the natural/demesne character of the lands.

## 7.0 Regional Spatial & Economic Strategy

The Regional Spatial and Economic Strategy for the Eastern and Midlands Region (RSES) replaced the Regional Planning Guidelines (RPGs) in June 2019. The RSES supports the implementation of national government policies such as the National Planning Framework (NPF) and also sets the framework for local economic development and spatial planning in the Eastern and Midland Region, including the Dublin Metropolitan Area.

The RSES is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level it provides a framework for investment to better manage spatial planning and economic development throughout the Region. The principal statutory purpose of the RSES is to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the regions.

With regard to the tourism potential of the region, the RSES notes that *'the Region is also home to areas of rich heritage and immense natural beauty that support a varied tourism and recreation offering'*. Further to this, we note that the protected structure on the submission lands has the potential to act as a pull factor for any future tourism development at these lands. With further development of the lands, the area will have the capacity to provide for a high-quality, low-impact recreational offering as a rejuvenation centre.

The following list included in the RSES identifies the following policy proposals which are relevant for the planning of tourism:

- ***Protecting heritage assets through sustainable tourism;***
- ***Targeting high growth potential areas;***
- *Incorporate Cultural and Sports-based Offerings;*
- *Respecting Brand Architecture and the Environment;*
- *Need to optimise Air and Sea Connections;*
- *Need to facilitate inter-modal transport transfers; and*
- *Support for Cross-Border Tourism*

The potential development of the submission lands can be facilitated by the Development Plan submission with which this report pertains to. The lands are considered to have the capacity for tourist accommodation development which is ancillary to the main existing protected structure on site. Such development could include the provision of lodges/pods on site which are situated within the existing

landscape and positioned in a way so as not to reduce to the visual amenity of the existing Beech House protected structure.

In addition to this, we note that Fingal County Council has identified a site adjacent to the submission lands as an area for future development. The Kellystown Local Area Plan (LAP) sets out the potential of these lands for a future mixed-use development with a potential yield of approximately 1,055 to 1,538 no. units. It is considered that the submission lands, due to the provision of this LAP, it is considered that these submission lands are situated within a high growth potential area making them consistent with the policy proposals for the planning of tourism as identified in the RSES.



Figure 6.0 Kellystown Local Area Plan.

In addition to the Kellystown Local Area Plan situated to the east of the submission lands, we note the Barnhill Local Area Plan situated to the west of the submission lands adjacent to the railway line. It is estimated that these lands have a potential residential yield of c. 935-1,106 no. units. It is therefore considered that due to the provision of these two LAPs and the provision of the Clonsilla Strategic Development Zone situated to the north of the site that the submission lands are considered to be a high growth potential area capable of tourism development.



Figure 7.0 Barnhill Local Area Plan

## 8.0 Conclusion

The submission lands comprise some 7.5 hectares (c. 18.5 acres) and are generally located east and south of the Clonsilla commuter railway line and north of the R121 regional road in the south western corner of Fingal County Council's administrative area.

In summary this submission requests:

- That the wording of Proposed Amendment to Objective EEO48 contained in Section 7.5.2.1 'Integrated Tourism Complexes' of the Draft Fingal Development Plan 2023-2029 be amended to read as follows (additional text shown in bold and underlined):

*'Facilitate, where appropriate, (those complexes as listed in 7.5.2.1 Abbeyville, Dunsoghly Castle, Roganstown, Tyrrelstown House, Hampton Demesne, Beech Park House), the conversion of former demesnes and estates and their outbuildings into integrated tourist, leisure, recreational and **rejuvenation/recuperation** complex type developments subject to architectural conservation best practice and proper planning and sustainable development, having regard to protecting the demesne type landscape and existing natural features, and providing improved pedestrian access, where appropriate **and the provision of a limited number of ancillary buildings/lodges for tourism/ancillary accommodation grouped in a communal configuration**.'*

### 7.5.2.1 Integrated Tourism Complexes

The Council will continue to encourage the development of integrated tourism/leisure/recreational complexes in demesne type landscapes in the County, where such uses are consistent with the retention of such landscapes. The conservation of these assets into the future is essential and the Council recognises the need for the appropriate sustainable reuse of these buildings. An integrated tourism/leisure/recreational complex should include a number of the following:

- Hotel and associated facilities, conference centre, golf course, equestrian centre, **recuperation complex**, trekking centre, fitness centre, indoor/outdoor water facility, fishing facility, museums, nature trails, walking routes and associated facilities.

- **Where appropriate, it may also include a limited number of residential dwellings, preferably grouped in a courtyard type configuration, as well as leisure retail which is ancillary to the main tourist attraction. The development of any such facility shall incorporate the refurbishment and re-use of existing buildings for related uses.**

**\*(New text in bold underlined text)**

This submission is also requesting that the definition for an Integrated Complex at Beech Park House that is currently set out within the Fingal Development Plan 2017 – 2023 is reinstated within the Draft Fingal Development Plan 2023-2029. This definition is as follows:

**Beech Park House located to the south-west of Clonsilla village contains the Protected Structure Nos.709 and 710 which comprise the ‘former outbuildings of Beech Park house’ and the ‘house, lodge and gates’. Consideration will be given to an integrated tourism and recuperative centre at Beech Park House. The nature and extent of the facilities shall be determined primarily by the need to conserve the house, lodge and courtyard and their surroundings, which are of architectural importance, and the special landscape character and heritage features of the land.**

In considering Beech Park House for use as an integrated tourism and recuperation centre, there is an inherent opportunity to secure the long-term commercial viability of the tourist use proposed, the long-term integrity of a Protected Structure, while also providing a community amenity for recreation and leisure use by the wider community. The provision of a strictly limited number of ancillary buildings for use as tourist accommodation, when designed and located appropriately, will only serve to further ensure the preservation of the Protected Structure and its established historic landscape by securing the long term proposed tourist use.

We trust that the Planning Authority will have regard to the contents of this submission in its adoption of the Fingal Development Plan 2023-2029.

Yours sincerely,



Kevin Hughes MIPI MRTPI  
Director  
HPDC Ltd.

## **Appendix A – Potential Development of Submission Lands as prepared by MOLA Architecture**