

Development Plan Team,
Planning and Strategic Infrastructure Department,
Fingal County Council,
County Hall,
Main Street,
Swords,
Co. Dublin

19th December 2022

RE: Submission to Proposed Material Alterations to Draft Fingal Development Plan 2023-2029

Dear Sir / Madam,

1.0 Introduction

In accordance with Sections 9, 10, 11 and 12 of the Planning and Development Act, 2000 (as amended), DOWNEY, Chartered Town Planners, 29 Merrion Square, Dublin 2, D02 RW64, on behalf of our client, Gerard Gannon Properties, Kinvara House, 52 Northumberland Road, Ballsbridge, Dublin, D04 A665, hereby wish to make this submission on the proposed Material Alterations to the 'Draft Fingal Development Plan 2023-2029' to Fingal County Council.

This written submission is made in response to an invitation for comments from interested parties by Fingal County Council. This submission is being made within the specified timeframe for submissions i.e., 22nd December 2022, as set out on the Draft Development Plan's website.

This written submission relates to the proposed amendment that seeks to remove the Local Area Plan (LAP) designation from the Belcamp lands under proposed Material Alteration PA SH 9.9.

2.0 Planning Legislation Context

The process for the preparation of the Draft Development Plan is contained within Section 11 of the Planning and Development Act, 2000 (as amended) and the consultation process of the Draft Development Plan is contained within section 12 of the Planning and Development Act, 2000 (as amended), which states:

"12 - (7) (ad) (ii) "that written submissions or observations with respect to the proposed material alteration or an assessment referred to in paragraph (aa) and made to the planning authority within a stated period shall be taken into account by the authority before the development plan is made".

This submission to the draft Development Plan is being made in accordance with Section 12 (7) (ad) (ii) of the Planning and Development Act, 2000 (as amended) and is being submitted within the specified timeframe (22nd December 2022) as set out on the website of the Draft Fingal County Development Plan 2023-2029.

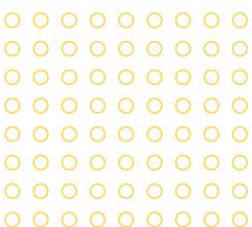
3.0 Grounds of Submission

This submission, on behalf of our client, Gerard Gannon Properties, relates to the proposed Material Alteration PA SH 9.9, which removes the Local Area Plan (LAP) designation from the Belcamp lands.

DOWNEY submit to the Planning Authority that our client welcomes the proposed Material Alteration to the Draft Fingal Development Plan 2023-2029, given the significant progress made in terms of developing the lands which have been zoned appropriately for almost 20 years. It is noted that developments across the lands are now constructed/occupied, under construction, at a detailed design stage or under consideration by the competent authorities through the planning application process (including a trans-boundary Strategic Housing Development application on lands within both Fingal County Council and Dublin City Council administrative areas which is currently pending decision with An Bord Pleanála), and as such a Local Area Plan (LAP) designation on the subject lands is no longer warranted.

In this instance, the Belcamp lands are unique in that our client, Gerard Gannon Properties, is the sole owner of the remaining developable lands at Belcamp and the ongoing development of the lands is being carefully considered and designed such that it does not impact or prejudice the future development of surrounding landholdings. The lands are subject to extant planning permissions which are under construction, and several live planning applications which are on appeal with An Bord Pleanála, live applications with Fingal County Council or with An Bord Pleanála including a large SHD application for 2,527 units and complementary land-uses (childcare, retail, recreational, etc). These applications represent the completion of the Belcamp lands in accordance with local and national policy guidance which must be recognised.

Therefore, the overall lands which were originally envisaged for the preparation of a Local Area Plan (LAP) have since progressed beyond strategic plan making and are now developed/occupied, under construction or at detailed design planning application stage/under consideration by the competent authorities. In this context, DOWNEY are of the professional opinion that a Local Area Plan (LAP) designation on the subject lands is no longer warranted, and thus the removal of the LAP designation from the Belcamp lands as proposed under Material Alteration PA SH 9.9 is welcomed.



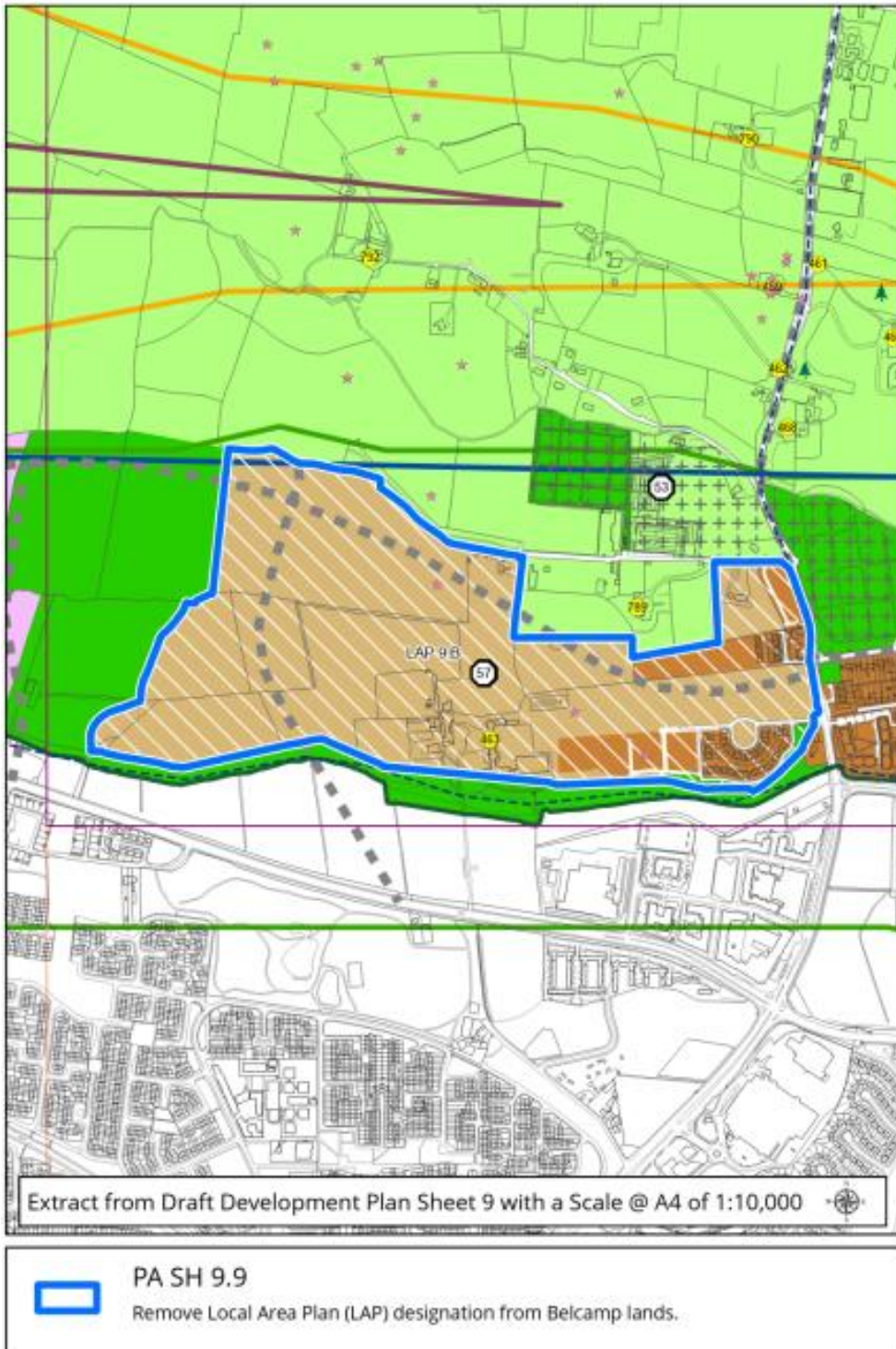
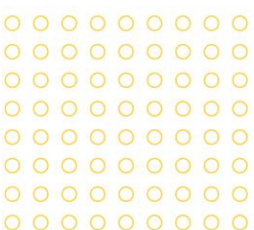


Figure 1: Belcamp Lands PA SH 9.9 removes the Local Area Plan designation from Belcamp Lands



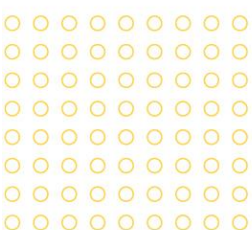
Within the Material Alterations, Belcamp has also been removed from “Table 2.16: Schedule of Local Area Plans to be commenced over the Plan Period”. It must also be noted that Local Area Plans will be drafted by the Planning Department based on the Council’s priorities and subject to resources. It is submitted that all of the baseline survey information that would be required as part of the LAP process has been carried out to date for the lands, including:

- A full Natura Impact Statement
- Environmental Impact Assessment Report, including:
 - Traffic and junction surveys
 - public transport capacity assessments
 - population and demographic analysis
 - water quality
 - air quality & climate
 - noise and vibration
 - archaeology – full testing
 - architectural heritage and conservation
 - photomontages
 - tree and hedgerow surveys
 - mammal, bat, badger, flora and fauna surveys
 - Retail Impact Assessment.
- Furthermore, consultation with both Dublin City Council and Fingal County Council took place, along with prescribed bodies (Irish Water, Inland Fisheries Ireland, NTA, DAA, IDA etc).

The removal of the LAP designation at Belcamp will enable the potential delivery of c. 1,300 housing units within the functional area of Fingal County Council (and c. 1,200 on Dublin City Council lands), on appropriate zoned and serviced Tier 1 lands. The Belcamp Lands are of National importance and vital for achieving *Housing for All* targets. Furthermore, water supply is available on site via connections to the North Fringe watermain. Irish Water have confirmed in their Confirmation of Feasibility and subsequent opinion reports that the development can be facilitated without upgrade works to the existing water supply network.

4.0 Conclusion

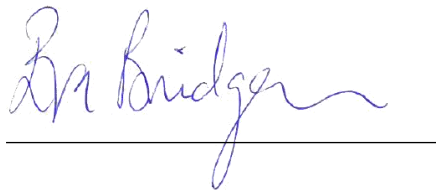
This submission has been prepared by DOWNEY on behalf of our client, Gerard Gannon Properties, regarding the proposed Material Alteration PA SH 9.9 to the Draft Fingal County Development Plan 2023-2029, which removes the LAP designation from the Belcamp Lands.



Downey, on behalf of our client, welcome the proposed Material Alteration PA SH 9.9. The proposed removal of the LAP designation is further reinforced by the significant progress of development on the lands in recent years as the lands are subject to extant planning permissions which are under construction, with several live planning applications in the planning process in present which are on appeal with An Bord Pleanála, live applications with Fingal County Council or with An Bord Pleanála. These applications represent the completion of the Belcamp lands in accordance with local and national policy guidance which must be recognised.

In light of the foregoing, Downey Planning, on behalf of our client, respectfully request that Fingal County Council consider the grounds of this submission to the Proposed Material Alterations to the Draft Fingal Development Plan 2023-2029.

Yours sincerely,



Eva Bridgeman MIPI
Director
For and on behalf of DOWNEY

