

# Draft Belmayne – Belcamp Masterplan 2020

## Report on Submission Received from Public Consultation Exercise

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### 1.0 Introduction

Dublin City Council has prepared a draft Masterplan for lands at Belmayne and Belcamp Lane in Dublin 13 and 17. The majority portion of the Masterplan lands are in Council ownership. The purpose of the Masterplan is to demonstrate proposals for buildings, spaces, movement and land use for Belmayne and Belcamp Lane, including three dimensional drawings, in accordance with the vision, spatial framework, policies and objectives and the development framework as set out in the Clongriffin – Belmayne Local Area Plan 2012. While the Masterplan will be non-statutory, it is an action of the Local Area Plan (LAP) and will act as a guide for the implementation of the LAP as it relates to these lands.

The Draft Belmayne – Belcamp Lane Masterplan was presented to the North Central Area Committee on the 18<sup>th</sup> of November 2019 and was noted by Members of that Area Committee. The Masterplan was also the subject of a presentation to the Community Forum meeting in Clongriffin in November 2019.

The Draft Masterplan was subsequently placed on public display on 16<sup>th</sup> July 2020 for a period of 6 weeks and, notwithstanding the non-statutory status of the Masterplan, all relevant statutory agencies were formally consulted. The public consultation period closed on the 27<sup>th</sup> August. In total 100 submissions were received.

This report identifies, summarises and responds to the 100 submissions received and gives the Assistant Chief Executives response and makes recommendations to the Elected Members on the issues raised.

Section 2.0 of this report gives the Policy Background to the Draft Belmayne – Belcamp Lane Masterplan. Section 3.0 introduces the Masterplan. Section 4.0 outlines the Public Consultation process and the List of Submissions. Section 5.0 summaries all submissions received and set out the Assistant Chief Executives Response to the issues raised and Recommendations.

Section 6, the conclusion section, sets out in summary the proposed changes to the Masterplan and give a recommendation of approval to Elected Members of the North Central Area Committee of the Masterplan, as amended.

### 2.0 Policy Background to the Draft Belmayne – Belcamp Lane Masterplan

The Masterplan lands comprise two distinct parcels of land – c.15ha at Belmayne and c.9 ha at Belcamp Lane. The **Belmayne – Belcamp Lane** lands are located to the north east and south west of the Malahide Road Junction, respectively, adjacent Clarehall and Northern Cross. The lands are served by the Malahide Road Bus route (City Centre / Clongriffin) which facilities a high frequency bus service from the city centre to Clongriffin Rail Station.

The Masterplan lands form part of a wider strategic development area (200ha) at Clongriffin/Belmayne which is identified for strategic housing purposes / mixed use quarter, under the National Planning Framework, the Regional Economic and Spatial Strategy (EMRA) and at the local level under the Dublin City Development Plan 2016 – 2022.

A statutory Local Area Plan was made for this wider area in 2012 - the Clongriffin – Belmayne Local Area Plan 2012 (LAP). The life of that LAP was extended in 2017 for a further 5 years as the LAP objectives had not been secured and the Local Area Plan was deemed to be consistent with the 2016 – 2022 Dublin City Development Plan.

The development of the masterplan lands in accordance with the LAP development strategy seeks: the completion of 'Main Street', the completion of the commercial core (**Key District Centre**) at Northern Cross / Clarehall) by the development of new town centre nodes at Belmayne and Belcamp Lane; the development of connections to existing communities (crossings and junction upgrades); the provision of the Malahide Road Junction by-pass (Relief Road) and, the development of new residential communities / community facilities, all based around high public transport access.

The Local Area Plan envisages, in accordance with its Key District Centre designation, a mix of town centre uses at sustainable densities, to serve (along with Clongriffin Town Centre) the c.25,000 population envisaged for the Local Area Plan area.

It is a requirement of the Local Area Plan that a Masterplan be prepared for lands at Belmayne and Belcamp Lane and the Local Area Plan details the different elements to be addressed as part of any masterplanning exercise for the lands.

While the Local Area Plan determines the appropriate policies and development framework within which this Masterplan should be prepared, the Masterplan must also take cognisance of national, regional and local planning policy made since 2012, where relevant, and any new relevant ministerial guidelines.

The Masterplan will be one of the planning mechanisms that together with the LAP and Development Plan will help to deliver a sustainable new community on the lands at Belmayne and Belcamp Lane.

### 3.0 Description of Masterplan

The purpose of the masterplan is, in accordance with the LAP, to put forward a comprehensive worked up urban design framework for the subject lands. Specifically, the Masterplan identifies the quantum and location of town centre development achievable on these lands for a range of uses (residential, mixed use commercial, community, civic and open space) along with achievable height, massing and bulk of buildings, grid and block detail, movement, land use, spaces, density, and residential and commercial yields as required by the LAP. The Masterplan outlines the following potential development yield on the subject lands (Table 1) and the proposed masterplan layout is shown below (Figure 1).

Table 1: Masterplan: Potential Development Yield

	Belmayne District Centre	Belcamp Lane	Masterplan Total
<b>Residential Units</b>	c. 1,400-1,600 units	c. 800-1,000 units	c. 2,200 – 2,600 units
<b>Retail/café/commercial</b>	c. 10,000 sq. m	c. 2,000 sq. m	c. 12,000 sq. m
<b>Community/ Educational</b>	c. 21,500 sq. m	c. 4,000 sq. m	c. 25,500 sq. m
<b>Public Open Space / Civic Space</b>	c. 20,000 sq. m	c. 6,000 sq. m	c. 26,000 sq. m



Figure 1: Proposed Layout of Belcamp-Belmayne Masterplan land

The lands at Belmayne and Belcamp Lane can be developed independently of each other. The build out of the Belcamp Lane lands requires the completion of significant infrastructure works - roads and services (including part of a Relief Road – Malahide Road by Pass).

## **4.0 Public Consultation & the List of Submissions Received**

Members of the public were invited to make submissions or observations regarding the Draft Masterplan. A Public Notice was published in the Irish Independent on 16<sup>th</sup> July 2020. The Draft Belmayne – Belcamp Lane Masterplan was placed on public display on line together with the SEA and AA screening reports and the Flood Risk Assessment and were available for inspection by appointment in the Civic Offices, Wood Quay and in the North Centre Area Office, Bunratty Road from Thursday 16<sup>th</sup> July 2020 to Thursday 27<sup>th</sup> August 2020 (both dates inclusive).

Details were also made available on Dublin City’s website at [www.dublincity.ie](http://www.dublincity.ie). Notice and copies of the Draft Masterplan were sent to a range of government departments and state bodies including to the Minister, the Office of the Planning Regulator, the Eastern and Midland Regional Assembly, adjoining planning authorities, the prescribed authorities (as prescribed for statutory land use plans) and others.

### 4.1 Strategic Environmental Assessment (SEA) Screening

A Strategic Environmental Assessment (SEA) Screening Determination has been made by Dublin City Council regarding the Draft Belmayne – Belcamp Masterplan.

The Planning Authority has determined that the Draft Belmayne – Belcamp Masterplan would not be likely to have significant effects on the environment, taking account of relevant criteria set out in Schedule 2A of the Planning and Development Regulations, 2001, as amended, and taking into account an observation by the Environmental Protection Agency (EPA) received on 9th January 2020 and by the Geological Survey of Ireland (GSI) received on 13th January 2020.

### 4.2 Appropriate Assessment (AA) Screening

An Appropriate Assessment Screening was undertaken of the Draft Belmayne – Belcamp Masterplan, in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/43/EEC). The Stage 1 Screening determined that Appropriate Assessment of the Draft Belmayne – Belcamp Lane Masterplan was not required as the proposal, individually or in combination with other plans or projects, was not likely to have a significant effect on a European Site. On this basis, Dublin City Council as Competent Authority (in compliance with Part XAB of the Planning and Development Act 2000, as amended), and taking into account the observation from GSI dated 13th January 2019, determined that an Appropriate Assessment of the Draft Masterplan was not required.

### 4.3 Strategic Flood Risk Assessment

The making of the masterplan has undergone an appropriate level of Flood Risk Assessment in accordance with the Flooding Guidelines, 2009.

### 4.4 Submissions Received

The following persons or bodies made submissions or observations during the public consultation. Submissions are listed in the order they were received and processed. The 100 submissions are published on the Council consultation webpage, <https://consultation.dublincity.ie/>

**Table 2 – List of persons or bodies who made Submissions on the Draft Masterplan**

<b>Sub No.</b>	<b>Name</b>
1	Proinsias Mac Fhlannchadha
2	Siobhan O'Brien
3	Kildare County Council
4	TII
5	Mary Gormley
6	Inland Fisheries Ireland
7	Ronan Gearoid O Domhnaill
8	Catriona Griffiths
9	Jennifer Prior
10	Huong Tyrrell
11	Environmental Protection Agency
12	Department of Transport Tourism and Sport
13	Catherine Grant
14	Grace Kelly
15	Neil Griffin
16	Audrey McNevin
17	Dale Robinson
18	Jean Nolan
19	Kevin Keogh
20	Monica Ionescu
21	Belmayne Allotments Committee
22	Bernard Doyle
23	Giedre Adomaitiene
24	Larry White
25	Paddy Bourke
26	Marian Page
27	Steve Rawson
28	JC Kelly
29	Liam Ryan
30	Margaretta Walczak
31	Colin Curtis
32	Johanne Lindsay
33	Eamonn Brennan
34	Margaret Burgess
35	Dermot Gillen
36	Igor David
37	Igor David
38	Anne Keogh
39	John keogh
40	Kazimierz Wrobel
41	Thomas Daly

42	Mary Shortall
43	Martin Patterson
44	Brid McCarthy
45	Tom Farrelly
46	Noel Norton
47	Kieran Allen
48	Susan Heneghan
49	Karen Hogan
50	Caroline Creagh
51	Benny and Marion Usher
52	Ger Hand
53	Jo Green
54	Maria McCann
55	Philip Dunne
56	Margaruite Judge
57	Yvonne (Healy- by email)
58	Karen Stanley
59	Gavin Hand
60	Gareth Fogarty
61	Esther Morrissey
62	Sean Moore
63	Tom Mulligan
64	Lisa Ahern
65	IDA Ireland
66	Denis Fleming
67	Elaine McCann
68	Adam Connaughton
69	Keith Brennan
70	Julie Carroll
71	Aidan Jones
72	Rosemary Salmon
73	Liam Somers
74	Clare Phalan
75	Amanda Somers
76	Cian O'Callaghan T.D.
77	Cllr Tom Brabazon
78	John Downes
79	Leah Desmond
80	Aidan Ring
81	Christine Byrne
82	Cairn Homes Properties Ltd
83	Eamonn Prenter
84	Dublin Airport Authority
85	Linda Darbey
86	Martin Ryan

87	Environmental Health Services - Andrew Sulley SEHO
88	Cllr. Mícheál Mac Donncha
89	Cllr. Nial Ring
90	Cllr. Alison Gilliland
91	Tom Mulligan
92	Mary Murray
93	Ciara Layden and family
94	Tiffany Allen
95	Gannon Properties
96	Karina Malone
97	Mark Kane
98	Michael O'Toole
99	John Lynch
100	Co-operative Housing Ireland

## **5.0 Summary of Submissions and Response**

Each submission has been reviewed and the substantive issues raised have been summarised and are grouped, as appropriate, under the **14 headings** listed below. A response of the Assistant Chief Executive is given on the issues raised under each heading with a recommendation in relation to the Draft Masterplan. Where a text change is proposed this is shown in **red** for clarity purposes.

### **Headings: 5.1 – 5.14**

- 5.1 National and Regional Policy / Climate Action / Critical Services
- 5.2 Overall Masterplan Strategy / Layout
- 5.3 Belmayne Town Centre / Mix of Uses
- 5.4 Residential Density / Building Height
- 5.5 Walking / Cycling / Public Transport
- 5.6 Belmayne Main Street / Internal Street Network / Traffic Calming
- 5.7 Malahide Road Junction (R139 / R107) the Wider Road Network and Capacity Issues
- 5.8 Local Links
- 5.9 Car parking and EV Charge Points
- 5.10 Allotments
- 5.11 River Mayne
- 5.12 Green Open Spaces / Biodiversity
- 5.13 Noise
- 5.14 Clongriffin

### **5.1 National and Regional Policy / Climate Action / Critical Services**

The Environmental Protection Agency (EPA) has submitted that in proposing and implementing the Draft Masterplan it must:

- align with National and Regional planning policy;
- align with national commitments on Climate Change and Adaptation and it should incorporate the recommendations of sectoral adaptation plans from the national to the local level;
- ensure appropriate critical service infrastructure is in place or is required it to be put in place.

Response:

The National Planning Framework (NPF) (Project Ireland 2040) identifies the development of Clongriffin (Clongriffin-Belmayne) as a 'Key Future Growth Enabler for Dublin'. The Metropolitan Area Strategic Plan (MASP) for the Dublin Metropolitan Area (which forms part of the Regional Spatial and Economic Strategy for the Eastern and Midland Regional Area), identifies Clongriffin – Belmayne's potential to support Dublin's sustainable growth and continued competitiveness through the delivery of housing. The MASP also identifies the required infrastructure to service the lands.

In consideration of the need to transition to a low carbon and climate resilient society, the Draft Masterplan integrates land use and transport planning as demonstrated in its spatial pattern, urban form and mobility objectives. It also incorporates flood resilience and nature based solutions to surface water management in line with the Dublin City Council Climate Change Action Plan 2019.

Recommendation:

The submission is noted; no change is recommended.

## **5.2 Overall Masterplan Strategy / Layout**

The overall masterplan strategy and masterplan layout has been for the most welcomed and positively received in the submissions that address this issue. Specific considerations / observations / objections raised are addressed under Headings 5.3 – 5.14 below.

The following observations were made on the masterplan layout:

- A grid layout can be oppressive.
- A submission received from the owners of Newtown Court (Cooperative Housing Ireland) notes that the masterplan proposals encroach on its land which is in private ownership (road access, open space area etc).
- A submission by Cairn Homes Property Limited seeks the following changes / updates to the Masterplan Figures / Illustrations
  - omit the urban square shown on Parkside lands as it is located outside of the Masterplan lands;
  - update Masterplan Figures to shown Parkside development; and,
  - show the permitted routes onto Main Street from Parkside.

Response:

The observations submitted are noted. The Masterplan document is a non statutory document which demonstrates proposals in principle for the build out of lands at Belmayne and Belcamp Lane on mostly Council owned lands. In doing so it expresses the creation of walkable neighbourhoods that are permeable and which can connect to adjacent lands / existing residential areas. It is

considered reasonable to demonstrate the potential and desirability for such connections in the masterplan.

Where however, Masterplan proposals extends onto private lands – for illustrative purposes - and the landowner objects, it is reasonable to amend the masterplan to omit these proposals. See also comments under Heading No. 5.8 - *Local Links*

Recommendation:

Amend the Masterplan Figures, as appropriate, to:

- (a) omit masterplan proposals from CHI lands at Newtown Court in Masterplan Figures.
- (b) omit the urban square shown on Parkside lands as it is located outside of the Masterplan lands;
- (c) update Masterplan Figures to shown Parkside development; and show the permitted routes onto Main Street from Parkside.

### **5.3 Belmayne Town Centre / Mix of Uses**

The Masterplan proposals for Belmayne Town Centre including the square have been generally positively received with many submissions indicating that people want to see it provided but that community elements must be provided at the same time. Some submissions indicate that, as a Key District Centre it lacks ambition and is not a Town Centre, in terms of the quantum of retail / employment / community uses proposed. A number of submissions state that services, education and employment and housing need to be provided in equal measure. It is also commented that crime must be designed out at the design stage.

Specific comments on the proposed *Town Square, Retail / Retail Services, Employment Uses, Community Uses, and Residential Type and Tenure* are detailed below.

*Town Square* – The Town Square must be surrounded by retail, commerce, local employment, restaurants/cafes and the Town Square space requires careful thought and design. The square may struggle due to its proximity to the Malahide Road / Junction and there is a need to provide for greenery at the centre to reduce noise from the Malahide Road.

*Retail / Town Centre Services*– Submissions received comment on the current levels of vacancy in Belmayne and Clongriffin which negatively affects the feel and visual amenities of the area. Some people comment there is enough / not enough shops and plans for pubs, cinemas and restaurants are excessive. A submission comments on the fact that Clarehall Shopping Centre is hardly mentioned in the Masterplan and that retail development in the KDC should be sequentially developed from Clarehall outwards.

*Employment Uses* - The IDA submission and other submissions comment on the lack of employment uses proposed under the Masterplan. Other submissions state that the town centre needs to create

employment as the success of the town relies on having people working locally. The IDA submission also refers to the need to provide public transport access from the Masterplan lands to existing and proposed employment lands to the west / north west including employment lands located near the M1/M50 Interchange at Clonshaugh, a short distance west of the LAP.

*Community Uses* – Submissions indicate that more information is required about proposed community uses in terms of the form they will take and the timeline for delivery. There are concerns that these facilities may be delayed or may never be built at all and they note that some of these amenities have been promised before but not delivered. Submissions support / seek a Garda Station, Library with community uses, and Primary Care Centre. Submissions also seek more schools, amenities for youth / youth clubs, farmers market / purpose built structure for a market, community space / initiatives that support healthy lifestyles, local theatre, DCC gym and pool, arts centre, Mens Sheds and a submission also identifies the need to liaise with community groups to identify their needs – the Jack Nolan Report on Darndale is referred to.

*Residential Type and Tenure* - Some submissions acknowledge that Dublin needs more apartment dwellings, but that these must be higher quality / family apartments (including separate kitchens and living spaces), with higher quality services and amenities and open spaces. Others indicate that there is an over saturation of apartments in the area. Housing to be provided should serve a range of housing needs. A submission states that as this is Dublin City Council public lands they should be used for public housing / affordable housing with the development project managed and realised by DCC.

#### Response:

Belmayne Town Centre is located in a Key District Centre which includes Clare Hall Shopping Centre and Northern Cross. The Dublin City Development Plan 2016 – 2022 sets the policy context for Key District Centre Development. According to the Development Plan Key District Centres have the capacity to deliver on a range of requirements, the most important of which are:

- An increased density of development
- A viable retail and commercial core
- A comprehensive range of high-quality community and social services
- A distinctive spatial identity with a high quality physical environment.

The response to the issues raised in respect of Belmayne Town Centre as outlined below are made in the context of the City Development Plan Policy / Development Standards. The design of the Town Centre has been developed in accordance with the proper planning and sustainable development of the area.

*Town Square* – The detailed design of the Town Square will be advanced separately from this Masterplan.

*Retail / Town Centre Services* - Given the level of retail provision in existence in this Key District Centre, at Clarehall Shopping Centre / Clongriffin / Northern Cross and in view of the rates of commercial vacancy evident in this area, the Planning Authority commissioned the 'Economic and Retail Study – Belmayne and Clongriffin' by AECOM, to get an understanding of the economic and retail potential of the area.

That study made recommendations for potential retail capacity at Belmayne and these have been outlined in the Draft Masterplan. These floor space findings are advisory and not intended to serve as prescriptive floorspace caps to limit retail development on the masterplan lands or in the wider Key District Centre. As the proposed Belmayne Town Centre is located in a Key District Centre retail development on these lands is in accordance with Development Plan policy and in accordance with the Retail Planning Guidelines, 2012.

*Employment Uses*– A number of submissions have commented on the lack of employment opportunities within the Masterplan area. In respect of employment uses in Key District Centres, the City Development Plan seeks to encourage the provision of mixed use development incorporating retail, office, residential and the creation of small start up units in Key District Centre such as this one. Office development is permissible in Key District Centres but will be assessed on its merits taking account of the overall objective to provide for a mixed use environment.

The Masterplan seeks to provide a mixed use employment focus at Belmayne and as part of this identifies the need for a floorspace quantum of 1,500 sq. m. typical district centre own door commercial uses e.g. banks, solicitors for example. (The Belmayne Economic and Retail Study, 2018 refers). This does not preclude, however, the provision of larger office development at Belmayne which would be permissible in principle under the development plan. It is acknowledged that this fact should be made more explicit in the Masterplan.

It is acknowledged that public transport access / connections are required between the Masterplan lands and employment lands to the west. The masterplan seeks to improve cycling connections through the masterplan area east to west; the connection to Clonshaugh will be looked at as part of the Development Plan review; and will be raised with National Transport Authority.

*Community Uses* - The Council is also working with State Agencies and relevant stakeholders to secure / coordinate the provision of community infrastructure to serve these lands. It must be borne in mind that the Masterplan is a guide to future development; it does not have the ability to compel delivery by other organisations. To address this, the Council will continue to work closely with all organisations to encourage early delivery of as many elements as is possible.

*Residential Type and Tenure* – A variety of housing types is proposed as part of this Masterplan and given the density of development proposed in certain parts of the masterplan around the KDC; there will be a majority of apartment developments. This approach is in response to national policy and to secure optimal sustainable use of housing land within the City. The masterplan is a guide to the future form of development and it is not the function of this plan to address this issue specifically. It is the intent of the Council to secure a mixed tenure / housing for a variety of needs on these lands, given the size and scale of the masterplan area.

Recommendation:

Insert extra bullet point and text at Section B4.1:

- Office Development will also be permissible and will be encouraged within the KDC in accordance with the Development Standards of the relevant Development Plan.

Retail uses, leisure and commercial services including office uses will be concentrated on the edges of the Town Square, Malahide Road (opposite the existing shops) and along the Main Street to the junction with Churchwell Avenue. Commercial/leisure/office uses will be concentrated in those blocks to the south, adjacent to the Malahide Road and Grange Road Extension where they will benefit from exposure to passers by and provide a buffer to residential uses from traffic (see also Figure B4.2).

#### 5.4 Residential Density / Building Height

Submissions acknowledge that there is a need for new residential properties and the following issues are raised:

- There is already too much residential development / high density / high rise apartments in the area, some of which don't look well and reference is made to recent grants of permission for large apartment blocks / residential development on the Malahide Road, in Clongriffin and Belcamp College.
- High residential densities are being proposed at the expense of community / green infrastructure and don't take into account existing problems with water / drainage infrastructure.
- Objections to proposals for buildings of 6 to 10 storey which would be too high, would interfere with views / natural light of existing residents and would not be in keeping with existing heights. Blocks should step down in height where appropriate.
- Concerns expressed that existing, permitted and proposed densities and tightly built form in a small area will lead to dense overpopulation in the area which will lead to social problems.
- Other submissions indicate that proposed densities / height are appropriate in this area; particularly the proposed 3 to 4 storey buildings and the proposed variations in height is welcomed.
- The view is expressed in some submissions that the Gateway buildings will not compensate for isolating nature of wide carriageway.
- The use of cranes during construction should be agreed with DAA /Dublin Airport.
- One submission seeks that higher building height is required along Main Street (to east of Belmayne Avenue) to frame this major movement corridor as required by the National Planning Framework (NPO5) and the 2018 Apartment Guidelines and the 2018 Urban Development and Building Height Guidelines and give the view that the building heights shown of 2/3 storeys are not appropriate. The view is expressed that overly restrictive maximum heights should be removed along Main Street (Cairn Homes Property Limited).
- An alternative view is expressed that heights should be guided by Development Plan policy and not the Department's height policies.

### Response:

The Clongriffin / Belmayne Local Area Plan seeks higher density development at this **Key District Centre** in order to support existing and planned public transport infrastructure and planned commercial and community uses. It is considered that the Draft Masterplan responds appropriately to this requirement.

Building height in the Draft Masterplan has been applied within the range of the Local Area Plan while at the same time having regard to the 2018 Urban Development and Building Height Guidelines for Planning Authorities by DHPLG.

The submission by Cairn Homes Property Limited is noted. In line with the 2018 Urban Development and Building Height Guidelines for Planning Authorities by DHPLG, it is agreed that blocks located to the south of Main Street (to the east of Belmayne Avenue) should have greater height than the 2 to 3 storeys shown. In terms of increasing heights for other blocks / at other locations, Section B5 of the Draft Masterplan allows for consideration of variations to the building heights indicated subject to assessment criteria in the Building Height Guidelines.

### Recommendation:

Amend Key to Figure B5.1 and B5.2 as follows:

- Insert - 'School Building c. 3 - 5 storeys' and insert new colour shading adjacent.

Amend colour shading on blocks to the south of Main Street and to the east of Belmayne Avenue as follows:

- New colour shading for School Building as per the Key.
- Other buildings - colour shading corresponding to building height of c. 5 – 6 storeys.

## **5.5 Walking / Cycling / Public Transport**

A number of submissions received welcome the emphasis in the masterplan on connectivity and sustainable modes of transport (walking/cycling and public transport). The following detailed comments on sustainable modes of transport were made.

*Walking / Movement* - Some submissions seek the provision of wider footpaths within the masterplan area and in the wider area for ease and safety of movement, for example, for people with disabilities. The Department of Transport, Tourism and Sport, in its submission is seeking a universal design approach to the design and development of this built environment, including footpaths, roads, pedestrian crossing points and bus stops/shelters.

*Cycling Parking* - Submissions highlight that in order to support cycling in the masterplan and wider area, shared public bicycling facilities must be provided. This could include dedicated space within town centre buildings.

*Public Transport* - Some submissions comment on the fact that public transport - trains and buses at Clongriffin / Belmayne is often currently already overcrowded. Another submission raises a concern that the new Belmayne Town Centre is wholly dependent on buses. Submissions state that public transport needs to be increased in frequency and availability and it is queried if this is being co-ordinated with the NTA and relevant agencies.

Response:

The Masterplan has been developed to encourage residents and workers to walk and cycle to their destinations (schools, local facilities, parks) and to easily access public transport.

As set out in Section B3.6 of the Masterplan, streets within the Masterplan area are to be developed in accordance with the Design Manual for Urban Roads and Streets (DMURS). This prioritises the safety of vulnerable users and the movement of sustainable modes. Individual streets will be designed in accordance with DMURS and will incorporate a range of measures that not only calm traffic, but will also enhance the amenities of the area for the pedestrian / cyclist. The design of streets and urban spaces must also have regard to Section 8.5.11 of the City Development Plan 2016 – 2022 - 'Accessibility for All' which sets out policies and objectives to address and support agencies addressing the pertinent transport/access/egress needs of people with mobility impairment and / or disabilities.

As set out in Section B3.10 of the Masterplan, proactive integrated Mobility Strategies and Travel Plans, will be required to be submitted and approved as part of the planning process for residential and mixed use developments. Mobility Strategies must address issues such as car and bike share, high quality bike parking, mobility management and car parking provision.

In respect of DART Services at Clongriffin Railway Station, as part of the DART Expansion programme, an expanded higher capacity system is proposed under the National Development Plan 2018 – 2027 which will provide an increased weekday frequency of 15min in each direction.

In respect of Bus Services, the Bus Connects project is to provide a much enhanced bus service to the Dublin area providing in most cases full length dedicated bus corridors and cycle lanes. The masterplan lands will be served by Bus Connects Spine Route D (Clongriffin to City Centre) and this service is to be routed along Belmayne Main Street to interchange with DART / Rail services at Clongriffin Railway Station. This bus service will have a weekday frequency of 15min.

Recommendation:

Add the following text to the last sentence in Section B3.6 of the Masterplan:

Section B3.6 'Individual streets will be designed in accordance with DMURS **and the principle of universal design and 'access for all'** and will incorporate....'

## **5.6 Belmayne Main Street / Internal Street Network / Traffic Calming**

Submissions received are supportive of the extension of Main Street to the Malahide Road and the proposal to integrate a bus corridor along the route. Submissions have been received seeking a reduced scaled traffic calmed Belmayne Main Street which would have a primarily sustainable transport mode emphasis / local access. A submission received illustrates that consideration should be given to a one way / traffic calmed road system on adjacent proposed street and also that the exit onto Grange Road from the new Town Centre would be exit only – no access from Grange Road at this point.

Response:

As outlined in Section A1.6 of the Draft Masterplan, the development of Belmayne Street has been approved by Dublin City Council under the Part 8 planning process, Reg. Ref. 4214/18 refers. The construction of this road is due to commence in 2020.

In respect of the wider internal street network, its operation and function will be subject to a transport assessment(s) which will review all the potential transport impacts of proposed developments / optimum traffic systems.

As set out in Section B3.6 of the Masterplan, individual streets will be designed in accordance with DMURS and will incorporate a range of measures that not only calm traffic, but will also enhance the amenities of the area for the pedestrian / cyclist.

Recommendation:

The points raised in the submissions are noted; no change recommended.

## **5.7 Malahide Road Junction (R139 / R107) the Wider Road Network and Capacity Issues**

A number of submissions received have stated that there needs to be greater clarity on how traffic will be managed / reduced at the Malahide Road Junction / on the wider road network.

- There will be a significant increase in the number of people living in the area (including in adjacent Fingal area) and traffic will increase / potentially lead to gridlock.
- There needs to be clarity on when the Malahide Road junction (R139/R107) by-pass will be delivered. The full by-pass and the reduction of traffic at the Malahide Road Junction is a key prerequisite for the success of the civic squares and improved public realm which are the lynch pin of the proposed masterplan for the new town. The coordination and phased implementation of the full by-pass is required.
- Priority needs to be on pedestrians and bicycles at the Malahide Road Junction.
- Pedestrian overpass from Belmayne to Newtown side should be considered.
- The proposed link street (Belcamp Parkway) between Malahide Road and the R139, only partly responds to the need for a main bypass (C route) as detailed in the Belmayne / Clongriffin LAP. The proposed link street (Belcamp Parkway) needs more thought and modelling to ensure it does not add to further congestion at the main Northern Cross junction between the Malahide Rd and the R139.

- Gannons Properties submission sets out the DCC and FCC Roads Objectives for the wider area and it highlights the recommendations of the transportation study which Fingal County Council (FCC) commissioned for this areas – ‘South Fingal Transportation Study’, January 2019 by Systra Consulting Engineers. As a large landowner at Belcamp (87 ha), Gannon Properties is seeking to implement the recommendations of that study as it relates to its lands by progressing a proposal for an East / West Road Link and bus lanes (continuing Mayne Road across the Malahide Road and on westwards) as part of a current planning application in FCC.
- Gannon Properties states: the Belcamp Parkway part of the ‘By-pass’ as shown in the masterplan is welcome and that it should not be segregated from the community; it is Gannons intention that the extension of this ‘by-pass northwards to Belcamp would be DMURS compliant and single carriageway as should any road to run east / west along the south of the River Mayne (a DCC Roads Objective); it would suggest that the Belcamp Parkway Road as shown in the Masterplan should follow the alignment of the Roads Objective as set out in the City Development Plan (run more to the north west), thereby providing a more intuitive link to the proposed wider road network to the north which will be located more to the west (west of Belcamp College).
- The IDA submission highlights the need for public transport connections between the residential development on the masterplan lands and a number of strategic employment lands in the wider area (Dublin Airport / Clonsaugh Business and Technology and IDA employment zoned employment lands located along the R139 at Clonsaugh). It states that more consideration is required of east / west access along the R139 and the also of the future facilitation of orbital public transport routes which should be fully aligned and inclusive of the Masterplan lands.

Response:

As set out under Section B3.4 of the Masterplan, the proposed Link Street (Belcamp Parkway) is being proposed in order to relieve stress on and facilitate the redesign of the Grange Rd / Malahide Road junction to cater more effectively for cyclists, pedestrians and public transport. The delivery of this street, while allowing for the development of the Belcamp lands, must also demonstrate benefits to the surrounding area including: facilitating the NTA requirements under Bus Connects; the need to provide for pedestrian and cycle movements in all directions at the R132 / Malahide Road junction; and, considerations related to the public realm and urban design at the R132 / Malahide Road junction. The principle of this road has been agreed with the National Transportation Authority (NTA).

Dublin City Council will continue to work and liaise with Fingal County Council, the NTA and the key stakeholders in the area to support / progress roads projects which support public transport objectives.

Recommendation:

The points raised in the submissions are noted; no change recommended.

## 5.8 Local Links

A number of submissions have been received commenting on new links identified in the Masterplan. The following barriers to movement should be removed at Clare Hall estate from the shopping centre; Clare Hall from Grangemore; and, Grattan Lodge from Belmayne.

- *Grattan Lodge Link* - A number of submission object to the proposed Grattan Lodge Link. Objections raised concern the potential of such a link to give rise to anti social behaviour; an increase in theft and crime in Grattan Lodge; increased traffic / traffic congestion at the link leading to compromised safety of children playing on the green; residents privacy and safety being compromised in what is currently a quiet safe area; and, an increase in litter in the estate.

- *Newtown Court Link* - Submissions has been made regarding the proposed cross link pedestrian/cycle link through Newtown Court. According to the submissions, Newtown Court is a private residential complex and any decision to traverse this development should be negotiated with Co operative Housing Ireland (owners) / local residents. According to Cooperative Housing Ireland its main objection to the masterplan are that it was not consulted; the proposal to open up the estate as a through way for vehicles and pedestrians as set out in Figure B2 and B3 and as set out in sections B3.1, B3.5 and B3.8 of the Masterplan.

The IDA has commented that greater detail / clarity is required in respect of the proposed upgrade of the existing junction to provides pedestrian crossing between Northern Cross and Belcamp (via Newtown Court) (Section B3.5 refers).

Greater physical integration of the Masterplan with existing District Centre development required and should be subject of detailed design strategy. These links need to be provided at the outset.

### Response:

The principle objective of the Access and Movement Framework (See Figure B3.1) is to prioritise mobility for sustainable modes (i.e pedestrians, cyclist and public transport) and reduce car dependency. The Masterplan sets out desirable pedestrian / cycleway links between existing residential areas and the surrounding / proposed street network as they relate to the Masterplan lands.

*Grattan Lodge Link* – Section B3.9 of the masterplan identifies the potential for a new pedestrian link from Belmayne Avenue via the school site to Grattan Lodge. The advantage of such a link would be to substantially reduce car dependency and walking distances from Grattan Lodge to the new schools and shop. An application has been received by Dublin City Council for a new permanent 1000 pupil secondary school at Belmayne Avenue (Reg. Ref. 2600/20) and this development proposal shows the potential for a pedestrian link between Belmayne Avenue and Grattan Lodge via the school lands. As the link is through school lands security restrictions may limit access during certain periods and is likely to only serve the school. In view of the changed approach to these lands with the now granted school, it is considered that the value in including the objective is significantly reduced.

*Newtown Court Link* – The Masterplan identifies the potential for a link between Northern Cross and Newtown Belcamp via Newtown Court (Section B3.5), and the provision of a multiple new

pedestrian, cycle and vehicular links to the New town Court via the Belcamp lands (Section B3.8). The submissions are noted and the CHI ownership of Newtown Court is acknowledged. In the interests of the proper planning and development of the area, however, it is considered that it is appropriate that the Masterplan should recognise the potential and desirability of providing a cross link (Northern Cross to Belcamp lands via Newtown Court) as set out in Section B3.5 of the Masterplan. However, DCC acknowledges CHI's ownership of the lands and it is understood that any such link can only be provided with the agreement of the landowner.

Similarly, it is considered that Section B3.8 can be omitted from the Masterplan. The relevant figures in the Masterplan can be amended accordingly.

The Masterplan demonstrates a number of improved crossings / links connecting the Masterplan lands to existing District Centre Lands. These will be subject to a detailed design process and will be provided concurrently with development.

#### Recommendation:

Amend Section B3.5 of the Masterplan to read:

Upgrade of existing junction to provides pedestrian crossing between Northern Cross and Belcamp (via Newtown Court). **Newtown Court is a private development and as such this link will only be provided with the agreement of the landowner.**

Omit Section B3.8 and amend all Figures to show an un-breached boundary at Newtown Court.

Omit section B3.9 (references to Grattan Lodge) and amend Figures.

### **5.9 Car parking and EV Charge Points**

The submissions received referred to two points, namely

- Car parking is required in areas like the Town Centre.
- Some submissions stated that consideration should be given to electric charge points throughout the development.

#### Response:

Mobility Strategies for development will be required to be submitted and agreed with the Council and these will include car and bike share, high quality bike parking, mobility management and car parking provision, and requirements for EV charge points.

#### Recommendation:

The points raised in the submissions are noted; no change recommended.

### **5.10 Allotments**

The majority of all submissions received express concern at the proposal to remove the temporary allotments at Belmayne. These submissions (including a video submission) object to its removal / are concerned that an alternative site has not been identified in the masterplan. These submissions outline the value and many social, economic, physical, and ecological and health benefits of the current allotment site to the users and wider community. It is stated that a community of over 100 families / organisations / not for profit groups / school children / vulnerable groups use the allotments (112 plots and 2 large community garden spaces) and, with the help of the DCC Area Office, they have developed them at their own cost and effort. The Belmayne Allotments have won DCC awards.

Submissions note that the 2016 – 2022 Dublin City Development Plan supports the development of community gardens / allotments in new developments / higher density development (Section 16.10.3: Residential Quality Standards – Apartments and Houses, page 330) and it supports their provision as temporary uses on vacant, underutilized or derelict sites under Objective GI010 (page 170). It is pointed out that there is only one other allotment area in the North Central area. This is at St. Anne's Park and it is over subscribed.

These submissions generally recognise the need for housing but point out that this need must be balanced with the other needs of the community. It is stated that the retention of the allotments / the provision of new allotments at Belmayne would complement and reinforce the 'community' objectives and 'green' aspects of the masterplan - it already provides a community use, it acts as a 'green space' and its role could be expanded as an educational facility.

One submission has requested that an ecological study be carried out on the masterplan lands / allotments. The HSE has commented that new development should be supported by green open spaces / allotments.

#### Response:

The Belmayne Allotments are located on lands that have been identified for housing as part of the Clongriffin - Belmayne Local Area Plan (LAP) 2012. The 8150 sq. m. area incorporates 112 allotments and 1 community garden. Users are issued with an 11 month licence from Dublin City Council.

The Local Area Plan was prepared at a time when housing construction had ceased and housing development at Belmayne was unlikely to proceed in the short to medium term. Consequently the LAP supported the development of a temporary allotment project on housing lands. In accordance with the LAP policy, the Belmayne Allotments were developed to provide a productive use of lands for the benefit of the community but on a temporary basis pending their development. The future use of these lands has been clear from the outset, and communicated to the allotment holders.

The Planning and Development Department has now prepared a masterplan for these lands to enable and to guide their development. The development of a new allotment facilities of the size and scale of the current facility is not feasible as it would remove public open space of a significant scale from use in existing established areas. However, the Parks Department have given a commitment to review their lands to identify suitable sites for community gardens and allotments

over the next 3-4 months; however the development of allotments (with associated parking, fencing etc.) will require planning permission.

It is proposed to include in the masterplan a statement to reflect the commitment given by Dublin City Council to identify a new site(s) for allotments within and/or nearby the masterplan area; and within communities that currently use the Belmayne allotments. Alongside this, it is also proposed to include in the masterplan that a community garden will be required to form part of the new park within Belmayne.

Recommendation:

Include additional text in the masterplan to state that:

Amend Section B6.2 of the Masterplan to include the following as a last sentence:

**“The public park to be provided in Belmayne will include the provision of a community garden”.**

Amend Section A1.9 of the Masterplan by omitting the last line of the 4<sup>th</sup> paragraph and replacing it with the following paragraph.

**“As part of the first phase of implementation of this masterplan Dublin City Council will identify new location(s) for allotments within or near to the masterplan area that will allow for the continuation of this successful community initiative ; and where suitable, bring these forward through the planning process as required. New opportunities for community gardens, allotments and/or biodiversity rich green spaces will be examined as part of the detailed design process of the Council owned lands within the masterplan area, or close by.”**

### **5.11 River Mayne**

A number of submissions have been made in respect of the River Mayne and its relationship to the Masterplan lands.

- The River Mayne does not feature much in the Masterplan in terms of improving biodiversity.
- Lands lie in catchment of River Mayne a non-salmonid system. Inland Fisheries Ireland is looking to reintroduce salmon to the river and seeks best practice in respect of activities which could impact on the river / discharges should not impact on the river. It is stated that it is not clear what is happening with the River Mayne Walkway.
- The Masterplan should show green links to the River Mayne Walkway.

Response:

While the River Mayne does not form part of the Draft Masterplan lands it is agreed that connections between the lands and the river and the future River Mayne Linear Park would be important to illustrate on the Draft Masterplan.

The High Level Surface Water Management Strategy as set out in Appendix B of the Draft Masterplan seeks softer engineered approaches alongside a ‘treatment train’ approach to manage

and treat surface water at source on the Masterplan lands in order to reduce water flows and potential pollution to the River Mayne.

The Council is currently seeking funding under the Government's URDF programme for the development of the River Mayne Linear Park.

Recommendation:

Amend Figure B2.1 'LAP Application' to show links to River Mayne Walkway (future).

### **5.12 Green Open Spaces / Biodiversity**

A number of submissions have stated that the Draft Masterplan does not contain sufficient reasonably sized green open space for community use and the proposed open space areas are too small / do not provide different recreational / community functions such as MUGAs or multi sports courts or outdoor sports. It is stated that larger open space areas are required to balance the proposed density of development; contribute to improvements to air quality; retain / enhance the biodiversity of the area.

Response:

The Draft Masterplan has been prepared to help in the delivery of a new Town Centre at Belmayne. As is appropriate for a Key District Centre, Belmayne Town Centre is to have a strong urban form to reflect its location based around high frequency and high quality access to public transport. The Draft Masterplan provides c.26,000 sq m of open space / civic space. The proposed layout integrates with the wider locality and provides safe connections to existing and proposed open space / green areas / facilities, including Father Collins Park.

Recommendation:

The points raised in the submissions are noted; no change recommended.

### **5.13 Noise**

Lands to the north of the proposed Town Centre sit within a number of safety zones pertaining to Dublin Airport, namely Noise Zone C and the Obstacle Limitation Surfaces. Other elements of future development such as solar panels and bird attractants would also come under assessment.

Response:

Dublin Airport Authority's submission is noted. Noise sensitive development proposals will require a noise assessment to accompany any planning application for development to ensure sound insulation is incorporated into development proposals. Other elements of future development such as solar panels and bird attractants would also come under assessment. These issues are best addressed as part of the development management process.

Recommendation:

The points raised in the submissions are noted; no change recommended.

## **5.14 Clongriffin**

A petition from residents of Clongriffin with over 700 names has been submitted. This states that there are a number of empty large and small retail units at Clongriffin which could be used for multiple purposes but high rents are prohibiting their use. The petition also seeks a Garda Station, another bus stop at Marrsfield Avenue, more bin facilities and more children's facilities such as basketball courts and active spaces. Another submission outlines that Clongriffin is a huge asset but questions how will it be linked to Baldoyle.

### Response:

These submissions are not directly related to the Draft Masterplan and some of the issues raised need to be addressed at a more local level to Clongriffin. The provision of a Garda Station is responded to under Heading No. 5.3 above (Belmayne Town Centre / Mix of Uses). Fingal County Council has received funding to provide a cycle and pedestrian link between Clongriffin Railway Station and the eastern side of the Railway Line. The relevant points raised will be brought to the attention of the Area Office to progress. The Council is not in a position or has the legal function to address the rent levels charged by individual owners of their commercial property.

### Recommendation:

The points raised in the submissions are noted; no change recommended.

## 6. Conclusion & Recommendations

In summary the following changes are recommended for inclusion in the Masterplan prior to its final consideration and approval.

None of the changes proposed are considered material. A screening exercise has been carried out which concludes that the changes are not likely to have significant effects on the environment or any designated habitats or species.

### Recommended Changes:

#### 1. Overall Masterplan Strategy / Layout

Amend the Masterplan Figures, as appropriate, to:

- i. omit masterplan proposals from CHI lands at Newtown Court in Masterplan Figures.
- ii. omit the urban square shown on Parkside lands as it is located outside of the Masterplan lands;
- iii. update Masterplan Figures to shown Parkside development; and, show the permitted routes onto Main Street from Parkside.

#### 2. Belmayne Town Centre / Mix of Uses

Insert extra bullet point and text at Section B4.1:

- Office Development will also be permissible and will be encouraged within the KDC in accordance with the Development Standards of the City Development Plan 2016 – 2022.

Retail uses leisure and commercial services and including office uses will be concentrated on the edges of the Town Square, Malahide Road (opposite the existing shops) and along the Main Street to the junction with Churchwell Avenue. Commercial/leisure/Office uses will be concentrated in those blocks to the south, adjacent to the Malahide Road and Grange Road Extension where they will benefit from exposure to passers by and provide a buffer to residential uses from traffic (see also Figure B4.2).

#### 3. Residential Density / Building Height

Amend Key to Figure B5.1 and B5.2 as follows:

- Insert - 'School Building c. 3 - 5 storeys' and insert new colour shading adjacent.

Amend colour shading on blocks to the south of Main Street and to the east of Belmayne Avenue as follows:

- New colour shading for School Building as per the Key.

- Other buildings - colour shading corresponding to building height of c. 5 – 6 storeys.

#### 4. **Walking / Cycling / Public Transport**

Add the following text to the last sentence in Section B3.6 of the Masterplan:

Section B3.6 'Individual streets will be designed in accordance with DMURS and the principle of universal design and 'access for all' and will incorporate...'

#### 5. **Local Links**

Amend Section B3.5 of the Masterplan to read:

Upgrade of existing junction to provides pedestrian crossing between Northern Cross and Belcamp (via Newtown Court). **Newtown Court is a private development and as such this link will only be provided with the agreement of the landowner.**

Omit Section B3.8 and amend all Figures to show an un-breached boundary at Newtown Court.

Omit section B3.9 (references to Grattan Lodge) and amend Figures.

#### 6 . **Allotments**

Amend Section B6.2 of the Masterplan to include the following as a last sentence:

**"The public park to be provided in Belmayne will include the provision of a community garden".**

Amend Section A1.9 of the Masterplan by omitting the last line of the 4<sup>th</sup> paragraph and replacing it with the following paragraph.

**"As part of the first phase of implementation of this masterplan Dublin City Council will identify new location(s) for allotments within or near to the masterplan area that will allow for the continuation of this successful community initiative ; and where suitable, bring these forward through the planning process as required. New opportunities for community gardens, allotments and/or biodiversity rich green spaces will be examined as part of the detailed design process of the Council owned lands within the masterplan area, or close by."**

#### 7. **River Mayne**

Amend Figure B2.1 'LAP Application' to show links to River Mayne Walkway (future).

**Recommendation of Assistant Chief Executive**

It is recommended that the Belmayne-Belcamp Masterplan, as amended, be approved by the North Central Area Committee as part of the Clongriffin Belmayne Local Area Plan.

**Richard Shakespeare**

**Assistant Chief Executive**