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Planning Department
Fingal County Council,
Swords
K67 X8Y2

Re: Observation on LRD0068/S3E, Belcamp

A chairde,

I wish to make the following observations on the above application:

1. Need for Local Area Plan

This area was zoned with a requirement for a Local Area Plan (LAP) in the 2017 Fingal Development Plan. Unfortunately, that requirement was removed in the 2023 Plan. This area is of such scale that a LAP is needed to address the various interacting issues that relate to it. A Local Area Plan would have made provision consistent with the Fingal Development Plan objective of "walkable mixed-use neighbourhoods" and the 15-minute city principles endorsed by the National Planning Framework which are sorely missing from this application, and which will now need to be addressed by an Additional Information request.

2. Transport-oriented Development

Possibly the biggest element of the challenge of handing this application without an LAP is ensuring that the development is consistent with policy as regards (public) transport-oriented development.

This site is badly served by public transport. Given its proximity to the city, it is appropriately zoned. However, the current public transport provision to the site is very poor.

It is unusual in Fingal in that respect. The Parking Zones 1 and 2 set out in the Fingal Development Plan provide an easy reckoner for public transport access, and unlike most of the zoned land in Fingal, almost all of this site is in Zone 2 (i.e. lacking quality public transport access.)

Note the Fingal Development Plan requirements as to phasing (bold is my emphasis for this submission:)

14.9.1 Phasing of Development

Developments over 100 residential units shall demonstrate that adequate provision for specified physical and social infrastructural requirements, including: roads, sewers, water mains,

community, recreational and sporting facilities (indoor and outdoor), public transport, schools and shops are available at completion to support development.

A minimum requirement is for the applicant to be required to provide or fund the operation of a shuttle bus as proposed in the Traffic and Transport Assessment, with a minimum frequency timed to connect in Clongriffin with rail services to Dublin City Centre.

However, for a development of this scale (1350 housing units, with more to come across the river in Dublin City Council) the development should be integrated with the bus network in a coordinated manner. We managed in the recent past to provide railway stations at the start of the development of urban areas (Clongriffin, Adamstown.) We should be ensuring bus routes effectively serve this area from the start.

3. Light rail reservation/alignment

There is a strong argument that the ultimate public transport link here should be light rail. I have recommended for many years that a public transport reservation be provided through this land to facilitate an orbital light rail or metro connection between Clongriffin and the Metro North (now Metrolink) station at Dardistown. This reservation/indicative alignment was included in the draft of the current (2017) Fingal Development Plan when it went on public display in 2016. Unfortunately, it was then removed from the draft before adoption on the foot of advice that such a reservation should be based on detailed analysis.

The issue of this orbital public transport route was then included in the terms of reference for the South Fingal Transport Study https://www.fingal.ie/sites/default/files/2019-03/South%20Fingal%20Transport%20Study%20Jan%202019_0.pdf carried out by SYSTRA. That Study reached the following conclusions:

Fingal/Dublin Fringe – Dublin Airport – Swords Bus Route

The modelling analysis in the ERM shows there is strong demand for an orbital public transport route running between Clongriffin, Dublin Airport and Swords with the future land uses assumed for the SFTS. In addition to the bus services proposed by the NTA GDA Strategy, it is recommended that this future orbital connectivity is provided to help reduce car dependency for trips not travelling to the city, but to major employment areas potentially along the R139. It will also serve Dublin Airport and Swords, where large scale future employment generating developments will be driven by MetroLink but will attract trips from the wider areas including from Fingal/Dublin Fringe.

The level of demand suggests a high frequency bus service (every five to ten minutes) would be required to meet peak period demand. However, a relatively direct and reliable service would require the development of the EWLR Clonshaugh section and a link over the M1 to Dublin Airport, either by completing the suggested public transport only link over the M1 Dublin Airport spur interchange, or by providing the full EWLR. The relative costs and benefits of these alternatives would have to be carefully assessed.

However, a review of the NTA GDA Strategy is due to be undertaken by the end of 2022, at which point it would timely to assess the potential inclusion of the proposed orbital bus service for delivery post 2027.

SFTS Recommendation 24: To further consider the feasibility of a Fingal/Dublin Fringe – Dublin Airport – Swords Bus Route when Bus Connects and MetroLink are more advanced. The current phases of planning for these projects must give priority to those services already identified in the NTA GDA Strategy 2016-2035.

Unfortunately, the GDA Strategy Review didn't get into the level of detail which the SFTS recommended.

It did however identify in its Transport Strategy Development and Modelling Report that demand levels on the Malahide Road corridor will be appropriate to a light rail service. Therefore, it included a light rail route on the Malahide Road in its draft Strategy.

In addition, it noted both the importance of light rail for growth areas including the area of which Belcamp forms a part, and the potential requirement for orbital routes:

It is recognised that Luas is ideal for serving key growth areas Clonburris, North Fringe, Adamstown, and the Airport and integrates well with Park and Ride. However significant challenges associated with the Luas include achieving the alignments tested and integrating the lines outside the city centre, which could in time require an Orbital system.

(As I can't find the Transport Strategy Development and Modelling Report seems online, I attach it as an appendix to this submission.)

The correct approach to transport-oriented development, of course, is to plan for the public transport link in tandem with the forward planning for the urban development and to provide the public transport link in advance of occupation of the houses.

As I mentioned, this residential area was to be subject to a Local Area Plan. I intended to propose in the LAP process that the Plan provide for a light rail/metro reservation/alignment through these lands to form a link between the Malahide Road/ Clongriffin light rail proposal and the Metrolink proposal.

In these circumstances, the Council should ensure that it gives effect to the accumulation of policy at national regional and county level which commits the planning system to integrating public transport infrastructure into urban development proposals by means of public transport-oriented development.

The decision should require that the design of the proposed development is such that an orbital section of light rail/metro route can be included in the overall development.

4. Car dominated nature of the existing layout; potential for freeing residential areas from car parking

The proposed layout is highly car-dominated. Front gardens will be entirely given over to car parking and the visual and social impression will be of living in a car park. This will be a hostile environment

for vulnerable road users especially for children. The obvious alternative is to provide for car-free neighbourhoods, as encouraged by the Fingal Development Plan, whereby car parking would be in dedicated car parks on the edge of the residential areas.

5. Layout to prioritise walking and cycling

The design doesn't comply with the requirements of DMURS in terms of walking priority at junctions. Generally, the layout has been devised primarily to facilitate car access rather than to prioritise separate walking and cycling access. This area could be laid out with the sort of separate walking/cycling network seen in Houten, in which the active travel modes get priority every time their routes cross with motorised modes. I recommend that the layout be revised on this basis.

6. Insufficiency of childcare provision

The proposal to have only one childcare facility is contrary to the requirements of the Fingal Development Plan. The demand that is seen in other new neighbourhoods in the area will arise here. Provision should be made for more places in a number of smaller facilities in close walking distance of the different housing areas proposed.

7. Insufficiency of retail provision

It is incredible that only two small retail units are proposed for a development of 1350 housing units. The withdrawn application had 18 retail units and 3 cafés/restaurants. I can't find any justification in the planning statement for this proposed approach which is directly contrary to the planning policies set out in the National Planning Framework, Regional Spatial and Economic Strategy and Fingal Development Plan.

Access to supermarkets from these new houses will be very difficult. Public transport will not link directly. Cycling will require existing hostile junctions and roads to be navigated. Walking will involve excessive distances. Driving will be the forced choice, requiring car ownership for residents, but will require use of already congested roads, adding to the already considerable congestion.

8. Absence of employment uses

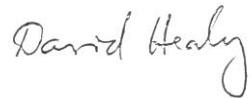
In line with 15-minute city principles, the development should provide space for small-scale employment uses.

9. Proposed Greenway Design

In an area with high population and very cycling-hostile existing road infrastructure, proposed Greenway will ultimately serve as an important east-west link, especially when the connection over the M1 motorway is made. It should be designed with segregation of people walking and cycling, or, at a minimum, with sufficient space to enable that segregation to be retrofitted.

Thank you for considering the above observations.

Best regards,

A handwritten signature in black ink that reads "David Healy". The signature is fluid and cursive, with "David" on the top line and "Healy" on the bottom line.

Cllr. David Healy

Attachments

Appendix 1 NTA's Transport Strategy Development and Modelling Report for the Greater Dublin Area Transport Strategy Review