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DÁIL ÉIREANN
BAILE ÁTHA CLIATH 2



The Secretary
An Bord Pleanála
Marlborough Street
Dublin 1

28/03/2013
EZZO CHEQUE
8120695

Thursday, 28th March 2013

AN BORD PLEANÁLA	
TIME 1600	BY Hand
28 MAR 2013	
LTR-DATED 27/3/13 FROM <i>pk</i>	
PL 3325/12	

Re: Plan No. 3325/12 (5/10/2012) for a Mosque, Cultural Centre, Conference Centre, Primary & Secondary Schools at Panhandle Park, Clongriffin, Dublin 13

Dear Secretary,

On behalf of constituents in Clongriffin, Donaghmede and Dublin North East/Dublin Bay North, I wish to make the following observations on the above proposal.

The Planning Permission Granted by Dublin City Council Failed to Invigilate Any of the Key Planning Issues Raised By Local Citizens & My Earlier Submission

The permission granted by Dublin City Council on March 7th last (and subsequently amended on March 8th) failed to examine serious planning issues raised at the local authority planning stage. The 30 planning



conditions to the permission do not address the regional scale, design and size of the proposal, the requirements of the Clongirffin Belmayne Local Area Plan (2012 to 2018) and the City Development Plan (2011 to 2017), the very difficult traffic and transport problems and the general grave problems of ingress and egress at the location. Condition 1 refers to An Bord Pleanála PL 29n.131058 for the wider Clongirffin Area but there is no reference to the Clongirffin Belmayne Local Area Plan 2012-2018. Both the original masterplan invigilated by An Bord Pleanála (above) and the new LAP, of course, envisaged the brownfield site between Marrsfield and Main Street (the Boulevard) as an almost wholly residential district punctuated by amenity open spaces and convenient pedestrian walking routes to the DART station and Clongirffin Town Centre.

Conditions 2 to 7 are reasonable and welcome (including a prohibition on a noisy environment). Conditions 8, 9, 10, 11, 12 and 13 are standard conditions on key infrastructure. Condition 14 (on sounds levels from the complex) seems at variance somewhat with Condition 5 which prohibits loudspeaker announcements beyond the premises itself. Conditions 15 to 27 are again standard construction and operational requirements. I have received an amended Condition 30 from Mr. Brendan Johnston of the Planning Department, Dublin City Council which refers to a Section 48 financial contribution of €111,963.23. Condition 28 rightly refers to the necessary bond or deposit and Condition 29 refers to the main financial contribution (under Section 48) of €419,728.51. The size of these financial contributions (related, of course, to the size of the proposal) is another reason why constituents would be grateful for An Bord Pleanála to also invigilate Plan 3325/12.

As outlined in the brief references to Conditions of the Dublin City Council permission above, very important and key planning issues are nowhere addressed by the Dublin City Planner and hence the need to be examined by An Bord Pleanala.

The Massive Scale & Size of the Proposal is at Variance With the Clongriffin/Belmayne Local Area Plan, the Original Clongriffin Masterplan and the Dublin City Development Plan (2011 to 2017)

When the huge North Fringe development was first proposed around 1998, I contacted a number of religious and philosophical bodies and asked them if they wished the proposed Clongriffin Masterplan to include religious and allied cultural facilities (to ensure the creation of a sustainable and integrated new urban district.) So proposed religious infrastructure clearly has an important role to play in creating community gain in a newly planned district.

The scale and size of Plan 3325/12, however, represents a major regional religious and cultural centre which will serve a huge area of Dublin City, Fingal and perhaps areas of North Leinster. In terms of the governing planning guidelines for the Clongriffin/Belmayne district, the proposal does not fulfil the criteria for completing Clongriffin/Belmayne as a sustainable local and district community. The Architect and Urban Design Report of Conroy Crowe Kelly nowhere indicates the gross area of the development but the footprint of the buildings are over 1.7 hectares or perhaps 5 acres or 2.5 football pitches. The 18,231 square

metres of development represents a large regional religious and education centre.

It is notable that the existing ten year planning permission for a key high density development at the subject brownfield site expires in a few months time and that Dublin City Council has just adopted a Local Area Masterplan to complete the new Clongriffin/Belmayne district (following extensive public consultation). As in 1998/99 and in some subsequent applications, the lead developer seems again to be attempting to frustrate democratically agreed land use and development size guidelines for the new urban district. Section 7 of the Conroy Crowe Kelly Architect and Urban Design Report (just barely over one page in size) makes no effort whatsoever to demonstrate how Plan 3325/12 in terms of scale and size complies with any of the key objectives of the three main Area and City Plans which must govern any future development in Clongriffin. In terms of the scale and size of the development, the pronouncements on "Movement & Transport Strategy", "Urban Design" and "Community & Social Infrastructure Strategy" regarding this planning proposal are nowhere supported in the new LAP (2012 to 2018), the Dublin City Plan or the 2002 Masterplan.

The Clongriffin/Belmayne Local Area Plan 2012/2018 is quite clear in its guidelines for the brownfield site where Plan 3325/12 would be located. In section 16.0 Phasing & Implementation Strategy for example, "Next Phase 1" (for the site in question), the LAP states; "Development in this location will integrate Marrsfield with Clongriffin Town Centre." And under "Indicative Land Use", the LAP prioritises "Residential Area Primarily" and other possible "community institution, health, recreation and amenity uses." In the clearly adjoining "Next Phase 2" of the LAP

(near the site in question), the "Character of Development" is again "Residential uses primarily." Likewise, the closely adjoining "Next Phase 3" in the Clongriffin/Belmayne LAP is also "Residential primarily" under "Indicative Land Use."

The Vast Scale & Design of Plan 3325/12 Constitutes a Standalone Large Regional Community Facility

The plans submitted by Conroy Crowe Kelly are grossly deficient in terms of detailed designs of each of the component elements of the new centre. But it is clear from the Architect & Urban Design Report that a major regional centre is envisaged for this project. The sheer scale of the above components is profound. The Mosque will be over 5,500 square metres in size with the conference centre at nearly 2,900 square metres and the two schools at a combined total of almost 6,900 square metres. The total 18,231 square metres represents a facility which will have a major regional usage footprint.

The Mosque itself will clearly be used mainly on Fridays during Jumaa prayers but with significant usage on other notable religious occasions such as during the Eid festivities and Ramadan. It is estimated that between 4,000 and 7,000 citizens will participate in religious services at the busiest periods. In addition, the Conference Centre will include a 600 seat conference room, a 130 seat restaurant and 200 seat banqueting hall. (It is appreciated by my constituents that such facilities will be available to all citizens of Clongriffin and the North Fringe.) The two schools will have a combined 28 classrooms and perhaps up to 900 children and staff attending when fully occupied. Finally, there is the swimming pool and fitness centre and the small residential and retail component.

Taken together, the numbers using the Mosque, schools and adjacent facilities could represent the usage of a large regional shopping centre, a large regional education centre or small university or perhaps a popular League of Ireland football stadium such as Tallaght Stadium. Therefore, the location of such a large centre within a future lower density residential district (as per the new LAP) seems inappropriate in terms of planning size. Constituents have asked, for example, why a smaller Mosque and Cultural Centre could not be constructed first with perhaps the schools built separately at separate locations throughout the North Fringe (under the planning guidelines of recent decades) to minimise traffic disruption to all residents across the region? Alternatively some constituents ask if something like the present proposal should not be built at a more transport accessible location in the North Fringe (perhaps adjacent to major national or regional road artery connections in our area)?

The Current Location Presents Insurmountable Transport & Traffic Problems

Clearly, the usage envisaged by Plan 3325/12 will have a huge impact in traffic terms on the existing and future residents of Clongriffin. The brownfield location was always envisaged as a moderate density residential area. The proposed receiving streets (as in Beaupark and the earlier sections of Clongriffin) are generally narrow and pedestrian-friendly. Only the Main Street/Boulevard was ever envisaged as a broad traffic-oriented street. Even the long-proposed Northern Parkway was proposed as a radial street to ease access and egress for Clongriffin and Belmayne residents.

The 192 surface car-parking spaces in the proposal is ludicrously low in view of the likely usage outlined above. The Waterman Moylan Transport Impact Assessment, of course, adds in the Gannon Park and Ride facility with 426 spaces at Clongriffin Town Centre and so-called "Unreserved Visitors" parking (including a total of 614 spaces). Besides the fact that if a significant portion of these "additional" carparking spaces are used for the purposes for which they first received planning permission, the Transport Impact Assessment clearly envisages perhaps thousands of vehicles coming and going to the proposed new facilities in Plan 3325/12 on a weekly and perhaps on a daily basis. Such an outcome will be disastrous in traffic terms for the sustainable community district planned for Clongriffin and indeed the nearly new district of Belmayne and the existing Donaghmede and Ayrfield districts.

The two major facilities in the Clongriffin part of the North Fringe, the Clongriffin DART Station and the enhanced Father Collins Park came from existing public infrastructure. Although the DART Station is open for over four years, the morning and evening throughput is around 400 commuters at each peak (information supplied by Irish Rail). The Dublin Bus Number 15 (formerly 128) route is similarly patronised in the North Fringe itself. A large number of the existing 2,500 occupied homes in Clongriffin/Belmayne use cars and the overstretched Hole in the Wall Road/Grange Roads/Clare Hall Avenue junction (especially at rush hours) bears testimony to that car usage. (Many North Fringe residents work in West Dublin, the Airport and Fingal and travel on journeys where there is no public transport).

A visit at night-time to the North Fringe Estates (eg Beaupark, Marrsfield Avenue and Belmayne Square) will vindicate the high level of vehicle

ownership (often two per house or apartment) and choc-a-bloc on-street parking. The addition of thousands of vehicles coming in and out of Clongriffin/Marrsfield each day would present a nightmare in traffic terms for existing and future new residents. Clearly many, if not most, visitors to the Mosque, conference centre and other facilities will not be coming by public transport, given that they will likely come from all across the West Dublin, Fingal and North Leinster regions where there is no convenient public transport.

Section 4.2 of the Transport Impact Assessment itself estimates that between 4 to 7,000 people will attend during the Eid holiday period and during Ramadan, other huge numbers of visitors will travel to Clongriffin. The Conference, Fitness Centres and other facilities will also draw large numbers. Section 4.4 again confirms that “the development is intended to serve a wide catchment within the north city area” and implausibly refers to car pooling” and “possible shuttle buses.” An 80% modal share for private vehicle transport is also said to be “a reasonably conservative” basis for increased traffic assessment. In that context, the estimates for car parking in Section 4.1 are totally unbelievable (one vehicle for 25 seats in the Mosque and Conference Centre for example) and one vehicle place per classroom in the schools. The overall maximum requirement should (at 104) be clearly multiplied by a factor of 15 to 25.

The data in Traffic Generation at Section 4.6 is also totally unbelievable and ludicrously below the actual traffic if this proposal proceeded in its current vast form. On the usage figures given the generation rate of trips at the busiest hours and AM peak, those figures would again have to be multipliers of the 700 and 177 or so in/out trips listed respectively for

these periods. (Sections 4.4 and 4.5). The Trip Distribution totals given at 4.7 of the Transport Impact Assessment are also not credible by a significant factor. Likewise the section 5.1 on Future Background Traffic (and indeed all the junctions traffic data) are based on totally unbelievable low traffic volumes. The OSCADY traffic analysis figures given in the Waterman Moylan report and in Appendix A are based on the above very inaccurate vehicle input figures and are irrelevant to the outcomes of this planning application.

Little Information Is Given In Application 3325/12 About the Detailed Design of the New Facilities

As I mentioned above, the application is deficient in the poor level of detail of the planned new structures. There is a large number of site plans at different levels but little detail of the overall impact of the buildings on the generally planned residential design fabric of this part of Clongriffin and the visual impact of the large Mosque on the surrounding and proposed new streets. The three and four storey heights seem to integrate well into the overall proposals for completion of the North Fringe in the Clongriffin/Belmayne Local Area Plan (which was recently passed by Dublin City Council). Of course, a smaller local area-type Mosque, in a revised plan, would be a striking addition to the Clongriffin Area streetscape and Town Centre facilities. But additional information on the design impact on Priory Street, Ballyhoy Road and Park Villas (as currently named) is important before any permission could be considered.

The receiving area is south of the Mayne River and just across from The Coast development in Baldoyle which is built above the Baldoyle polder.

Obviously, the area has benefitted from the Baldoye Flood Relief Scheme of the mid- and late-1990s, but I argued for lower density development at this location precisely because of its proximity to a polder district. The assumptions of the Waterman Moylan Engineering Assessment should therefore be carefully invigilated also in this large structure application.

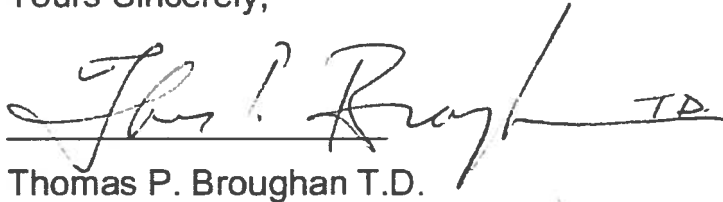
Plan 3325/12 Has Serious & Significant Planning, Size & Traffic Difficulties & Its Current Vast Form Is Unsustainable for the Residential Area of Clongriffin

The current size, scale and traffic difficulties associated with Plan 3325/12 as outlined above pose significant problems. In effect, the plan in its current form is clearly unsustainable for the residential district of Clongriffin. The regional nature of the proposed new religious, educational and cultural facility creates particular problems for a primarily residential area as well as contravening existing planning guidelines for completing Clongriffin and the wider North Fringe in a sustainable and proportionately sized manner. It was also gravely premature for the Dublin City Planner to process a proposal for such a large new facility before Dublin City Council itself had fully completed and published its long-awaited Clongriffin/Belmayne Local Area Plan (2012-2018).

The large size of the proposed new facility will also generate substantial traffic and transport problems for existing residents given the already underdeveloped transport and carparking infrastructure of the North Fringe. In addition, the documentation provided with the proposal

concerned is deficient and simply does not provide planners and local residents with enough information about the proposal given the vast size of Plan 3325/12 and its potential impact on Clongriffin and the wider North Fringe.

Yours Sincerely,

A handwritten signature in black ink, reading "Thomas P. Broughan T.D.", written over a horizontal line. The signature is cursive and includes the initials "T.D." at the end.

Thomas P. Broughan T.D.