

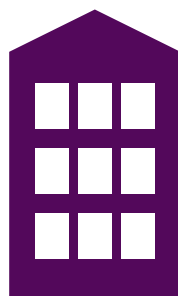


# **CHIEF EXECUTIVE'S REPORT PROPOSED VARIATION NO. 2**

**Alignment of the Fingal  
Development Plan 2017 – 2023 with the  
National Planning Framework (NPF) and the Regional  
Spatial and Economic Strategy (RSES).**

**March 2020**

**Fingal Development Plan 2017-2023**



## *PROPOSED VARIATION 2*

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## Introduction

The purpose of this Chief Executive's Report is to report on and provide a summary of the written submissions received in relation to proposed Variation No. 2 (the proposed Variation) to the Fingal Development Plan 2017-2023 (FDP), to respond to the submissions made during the consultation period and to make recommendations to the Elected Members on the issues raised.

On 10<sup>th</sup> January 2020 Fingal County Council (FCC) published notice that it had prepared proposed Variation No. 2 to the FDP, pursuant to Section 13 of the Planning and Development Act 2000 (as amended).

The proposed Variation will result in the following changes to the Development Plan:

1. Amendments to the Core Strategy and associated tables in the written statement; and
2. Minor amendments to text and objectives/policies throughout the written statement to refer to the National Planning Framework and the Regional Spatial and Economic Strategy.

## Structure of Report

This report contains the following:

- Public Consultation Process
  - Next Steps
  - Categorisation and Summary of Issues Raised
  - Summary of Recommendations
  - Overall Recommendations
- 
- Appendices: Appropriate Assessment (AA) and Strategic Environmental Assessment (SEA) reports on submissions received. (Note: this is a separate document)

Note that editorial changes and updating of table and objective numbers of the proposed Variation will be carried out and minor typographical or graphical errors or discrepancies will be amended.

## Public Consultation Process

### Outline of Public Consultation Process

In accordance with Section 13 of the Planning and Development Act 2000 (as amended) the proposed Variation was placed on public display from 10<sup>th</sup> January 2020 to 7<sup>th</sup> February 2020 at Fingal County Council Offices at County Hall, Main Street, Swords, Co. Dublin, at Fingal County Council Civic Offices, Grove Road, Blanchardstown, Dublin 15 and Fingal County Council's Offices, George's Square, Balbriggan, Co. Dublin, and in Fingal Branch Libraries and on the Fingal County Council on line consultation portal <https://consult.fingal.ie/en/consultation/proposed-variation-no-2-fingal-development-plan-2017-2023>

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During the public consultation period the proposed Variation including a planning report and Screening reports for Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) were disseminated to the public and submissions were invited as follows:

- Notification of the preparation and display of Proposed Variation No.2 to the Fingal Development Plan 2017-2023, including Planning reports and Screening Reports for SEA and AA, for the purpose of public consultation were placed in the Irish Times on 10<sup>th</sup> January 2020, the Fingal Independent on the 14<sup>th</sup> January 2020 and the Dublin Gazette on the 16<sup>th</sup> January, together with information on the public consultation programme and an invitation for submissions.
- Letters that provided notification of the proposed Variation and an invitation for submissions were circulated to, inter alia, the Minister for Housing, Planning and Local Government and relevant prescribed authorities.
- Public information displays of the proposed Variation and Screening Reports for SEA and AA were placed in Fingal County Council Offices in Swords, Blanchardstown and Balbriggan and made available in Fingal Branch Libraries and on the Fingal County Council on line consultation portal
- Members of the public and other interested groups were invited to attend drop-in public information sessions regarding the content of the proposed Variation held on 23<sup>rd</sup> January 2020 in Fingal County Council, Grove Road Office, Blanchardstown, 28<sup>th</sup> January 2020 in County Hall, Swords and 30<sup>th</sup> January 2020 in Balbriggan Library.

### Outcome of Public Consultation

A total of 26 submissions were received during the consultation period. All submissions have been considered. Listed in Table No. 1 are the submissions received including the name of the person or organisation making the submission and its allocated identification number.

Table 1: List of Valid Submissions Received

Submission No	Author	Link to Submission Received
FIN-C267-1	Health and Safety Authority	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14628/Submission%20-%20Health%20%26%20Safety%20Authority.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14628/Submission%20-%20Health%20%26%20Safety%20Authority.pdf</a>
FIN-C267-2	John Smith	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14632/Submission%20-%20John%20Smith_Redacted.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14632/Submission%20-%20John%20Smith_Redacted.pdf</a>
FIN-C267-3	Environmental Protection Agency	<a href="https://consult.fingal.ie/en/submission/fin-c267-3#attachments">https://consult.fingal.ie/en/submission/fin-c267-3#attachments</a>
FIN-C267-4	Transport Infrastructure Ireland	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14662/Submission%20-%20TII.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14662/Submission%20-%20TII.pdf</a>

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FIN-C267-5	Irish Water	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14667/Submission%20-%20Irish%20Water.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14667/Submission%20-%20Irish%20Water.pdf</a>
FIN-C267-6	Office of Public Works	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14669/Submission%20-%20OPW.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14669/Submission%20-%20OPW.pdf</a>
FIN-C267-7	Health Service Executive	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14671/hse%20comments%20fdp%20var%202.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14671/hse%20comments%20fdp%20var%202.pdf</a>
FIN-C267-8	Meath County Council	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14673/1.1.2%20Signed%20submission%20V2.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14673/1.1.2%20Signed%20submission%20V2.pdf</a>
FIN-C267-9	Councillor Tony Murphy	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14678/Submission%20-%20Cllr%20Tony%20Murphy.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14678/Submission%20-%20Cllr%20Tony%20Murphy.pdf</a>
FIN-C267-10	National Transport Authority	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14679/Submission%20-%20NTA.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14679/Submission%20-%20NTA.pdf</a>
FIN-C267-11	Seamus Breathnach	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14680/Submission%20-%20Seamus%20Breathnach_Redacted.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14680/Submission%20-%20Seamus%20Breathnach_Redacted.pdf</a>
FIN-C267-12	Tetarch	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14681/Submission%20-%20Tom%20Phillips%20and%20Associates%20on%20behalf%20of%20Tetrarch%20Capital%20Ltd.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14681/Submission%20-%20Tom%20Phillips%20and%20Associates%20on%20behalf%20of%20Tetrarch%20Capital%20Ltd.pdf</a>
FIN-C267-13	Eastern and Midland Regional Assembly (EMRA)	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14683/200207%20Fingal%20Variation%20no.2%20Alignment%20with%20ONPF%20RSES%20_FINAL.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14683/200207%20Fingal%20Variation%20no.2%20Alignment%20with%20ONPF%20RSES%20_FINAL.pdf</a>
FIN-C267-14	Cannon Kirk Ltd.	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14684/Cannon%20Kirk%20Ltd.%20Proposed%20Variation%20No.%202%20to%20Fingal%20Development%20Plan%202017-2023.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14684/Cannon%20Kirk%20Ltd.%20Proposed%20Variation%20No.%202%20to%20Fingal%20Development%20Plan%202017-2023.pdf</a>
FIN-C267-15	Glenveagh Properties	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14686/Submission%20-%20McCutcheon%20Halley%20on%20behalf%20of%20Glenveagh%20Homes.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14686/Submission%20-%20McCutcheon%20Halley%20on%20behalf%20of%20Glenveagh%20Homes.pdf</a>

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FIN-C267-16	Crekav Trading Ltd	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14687/Submission%20-%20Tom%20Phillips%20and%20Associates%20on%20behalf%20of%20Crekav%20Trading%20GP%20Ltd.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14687/Submission%20-%20Tom%20Phillips%20and%20Associates%20on%20behalf%20of%20Crekav%20Trading%20GP%20Ltd.pdf</a>
FIN-C267-17	Barina Property Group	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14688/Submission%20-%20Tom%20Phillips%20and%20Associates%20on%20behalf%20of%20Barina%20Property%20Group.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14688/Submission%20-%20Tom%20Phillips%20and%20Associates%20on%20behalf%20of%20Barina%20Property%20Group.pdf</a>
FIN-C267-18	Richmond Homes	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14689/Submission%20-%20JSA%20on%20behalf%20of%20Richmond%20Homes.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14689/Submission%20-%20JSA%20on%20behalf%20of%20Richmond%20Homes.pdf</a>
FIN-C267-19	Balbriggan Community Council	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14690/Submission%20-%20Balbriggan%20Community%20Council.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14690/Submission%20-%20Balbriggan%20Community%20Council.pdf</a>
FIN-C267-20	Glenveagh Properties	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14692/Submission%20-%20MKO%20Ireland%20on%20behalf%20of%20Glenveagh%20Properties%20Ltd.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14692/Submission%20-%20MKO%20Ireland%20on%20behalf%20of%20Glenveagh%20Properties%20Ltd.pdf</a>
FIN-C267-21	Cairn PLC	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14696/Submission%20-%20Cairn%20plc.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14696/Submission%20-%20Cairn%20plc.pdf</a>
FIN-C267-22	Dragonglen Ltd	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14698/Submission%20-%20Dragonglen%20Limited.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14698/Submission%20-%20Dragonglen%20Limited.pdf</a>
FIN-C267-23	McGarrell Reilly	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14701/Submission%20-%20McCutcheon%20Hanley%20on%20behalf%20of%20McGarrell%20Reilly%20Group.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14701/Submission%20-%20McCutcheon%20Hanley%20on%20behalf%20of%20McGarrell%20Reilly%20Group.pdf</a>
FIN-C267-24	Department of Education and Skills	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14702/Submission%20-%20Dept%20Education%20and%20Skills.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14702/Submission%20-%20Dept%20Education%20and%20Skills.pdf</a>
FIN-C267-25	KT Designs	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14703/Submission%20-%20Kevin%20Tolan_Redacted.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14703/Submission%20-%20Kevin%20Tolan_Redacted.pdf</a>

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FIN-C267-26	Office of the Planning Regulator	<a href="https://consult.fingal.ie/en/system/files/materials/14619/14704/Submission%20-%20OPR.pdf">https://consult.fingal.ie/en/system/files/materials/14619/14704/Submission%20-%20OPR.pdf</a>
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### Summary of Issues Raised in Submissions

All 26 valid submissions received by the Council during the public consultation period were read, summarised and analysed. Many of the issues raised were interrelated and therefore categorised under separate thematic headings for the purpose of identifying, analysing and responding to the issues together.

Table 2: Themes

	Theme
1	Overall Approach to the Variation, in the Context of the Development Plan Review
2	Population Projections, Growth Rates, Assumptions Used and Calculations
3	Specific Areas Across the County: <ul style="list-style-type: none"><li>• Balbriggan</li><li>• Baldoyle/Sutton</li><li>• Barnhill</li><li>• Donabate</li><li>• Howth</li><li>• Malahide</li><li>• Swords</li></ul>
4	Other

### Next Steps

This Chief Executive's Report on the public consultation for the Proposed Variation is hereby submitted to the members of Fingal County Council for consideration. The Planning and Development Act 2000 (as amended) outlines that the Elected Members of FCC have up to 6 weeks to consider the Chief Executive's Report and the Proposed Variation. The Chief Executive intends for the Report to be considered at the County Council Meeting on 14<sup>th</sup> April 2020.

### Categorisation and Summary of Issues Raised

This section sets out a summary of issues raised in submissions and the opinion of the Chief Executive in relation to the issues raised and recommendations. Section 13 (4)(b) of Planning Act, as amended, requires that the CE Report must specifically provide a summary of the recommendations, submissions and observations made by the Office of the Planning Regulator (OPR), National Transport Authority (NTA), the Eastern Midland Regional Assembly (EMRA) and the submissions and observations made by any other persons and



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give the response of the Chief Executive to the issues raised. For convenience, the submissions from prescribed bodies have also been dealt with individually.

### **How this document is organised**

Text from the existing Development Plan (which will remain the same) is shown in black, the proposed Variation is shown in green, new text resulting from this CE Executive's Report is shown in blue, deleted text is shown with a ~~strike through~~.

### Office of the Planning Regulator, Eastern Midland Regional Authority & National Transport Authority

#### Submission: Office of the Planning Regulator FIN-C267-26 Summary of Comments

The Office of the Planning Regulator notes and welcomes the overall reasoning behind the proposed Variation and has evaluated and assessed the proposed variations to the Development Plan, above, under the provisions of Section 31AM(1) and (2) of the Planning and Development Act 2000, as amended (the Act). The OPR, in their submission, has outlined a number of recommendations and observations, these are outlined below:

##### *Recommendation no.1:*

The core strategy of the Fingal Development Plan, as amended by the intended variation, is required to address the matters provided for under section 10(2A)(f) of the Act in relation to the projected population growth of cities and towns, the aggregate projected population in villages and towns of <1500 persons and in the open countryside as required by subsections, in Fingal.

##### *Observation no.1:*

The terminology used in the proposed variation is inconsistent with the legislative provisions under s.10(2A) of the Act, which refers to settlement hierarchy.

##### *Recommendation no.2:*

The Variation is required to include a statement that where any objectives of the Development Plan may be materially inconsistent with those of the NPF and RSES, the objectives of the NPF and RSES take precedence.

##### *Recommendation no.3:*

The planning authority is requested to:

- a) set out in the core strategy the projected growth for each settlement in the settlement hierarchy (as required under s.10(2A)(f) of the Act); and
- b) provide appropriate policy objective level mechanisms to ensure that the implementation of the core strategy accords with the population growth targets under the NPF and the RSES.

In this regard appropriate mechanisms may relate to provisions for sequential development of lands in a phased manner, as referred to under the RSES (RPO 5.5) and the Development Plan Guidelines for Planning Authorities (DEHLG, 2007); and / or relate to a tiered approach to zoning under the NPF (NPO 72a and appendix 3 refer). Within this context, the planning authority should also be mindful of any implications for its local area plans going forward.

##### *Recommendation no.4:*

In the absence of agreement of the MASP Implementation Group or, in default, the agreement of the Minister, concerning the proposed reallocation of population growth from

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Dublin city and suburbs to Swords, as provided for under NPO 68 of the NPF, the planning authority is requested to:

- a) provide that any reallocation of population to Swords key town in line with NPO 68 shall be on a phased basis.
- b) include a clarifying note stating that the reallocation of population to Swords key town as provided for under NPO 68, in the absence of prior agreement of the MASP Implementation Group, shall be considered an interim value which shall be subject to amendment in the review of the development plan to be consistent with any figure agreed by the MAPS Implementation Group or the Minister in default.

### *Recommendation no.5:*

The planning authority is requested to amend the settlement hierarchy in the proposed variation of the development to align with the population capacity targets and settlement hierarchy of the NPF and the RSES, in accordance with RPO 4.1 and RPO 5.5 of the RSES.

In this regard, the NPF provides for Dublin City and Suburbs at tier 1 (tier 2, the Regional Growth Centres are not applicable to Fingal) and the RSES designates the Key Towns (Swords) as the next tier (as provided for under the NPO 9). The settlement hierarchy under the proposed variation defines much of the Dublin city and suburbs area of Fingal as the tier below the Key Town of Swords. This approach is not consistent with the NPF and RSES and would have implications for the NPF's objectives concerning compact growth focused on the five cities and their suburbs. In addition, the RSES provides that the lower tier settlements are to be classified as follows: Self-Sustaining Growth Towns, Self-Sustaining Towns, Towns and Villages (in addition to the Rural areas), in accordance with the guiding principles and typology of settlements provided under the RSES (RPO 4.1).

### *Recommendation no.6:*

The planning authority is requested to include an objective or objectives to support the implementation of and promote development consistent with the objectives for compact growth under the NPF and RSES.

### *Observation no.2:*

The planning authority is advised to include an objective or objectives concerning the implementation of the policies and objectives of the Minister in respect of 'Urban Development and Building Heights Guidelines' (December, 2018) and Sustainable Urban Housing: Design Standards for New Apartments (March, 2018) issued under section 28 of the Act, view of NPO 13 of the NPF and RPO 3.3 of the RSES.

## **Chief Executive's Response**

Both the current and previous Fingal Development Plan provided figures in relation to the projected population growth for the County as whole.

In order to comply with recommendations 1, 3 and 4, it is recommended Section 2.5 is amended as follows:

### **New Section 2.5 Housing and Population Targets**

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The RSES translates the national and regional population targets set by the NPF to county level. Development Plans are required to be consistent with these targets. The approach in the core strategies is to realise these population targets which will be informed by the transitional population projections methodology set out in the NPF Roadmap, Appendix 2, and a robust evidence based analysis of demand, past delivery and potential.

As part of the approach of achieving consistency with targets of the RSES and the NPF, this core strategy seeks to achieve compliance with national and regional policy, will provide a policy framework for the concentration of development, co-ordinate infrastructural investment and facilitate the population growth outlined in the RSES and shown below.

Fingal County Council	CENSUS 2016	2026 Range		2031 Range	
		Low	High	Low	High
Dublin NPF Road Map	1,347,500	1,489,000	1,517,500	1,549,500	1,590,000
RSES Fingal Allocation	296,000	327,000	333,000	340,000	349,000
<del>RSES Adjusted Transitional Population Projections for MASP</del>		<del>327,000</del>	<del>333,000</del>	<del>340,000</del>	<del>349,000</del>
<i>Source: NPF/RSES and CSO Census</i>					

Table 6.2 above provides details of the population figures for the Dublin Region, extracted from the NPF Implementation Roadmap alongside figures for Fingal County Council, extracted from Appendix B of the RSES, Strategic Planning Area (SPA) and County Population Tables.

The NPF indicates that the average household size in 2016 of 2.75 persons per household is expected to decline to 2.5 persons by 2040 resulting in an average household size decline of 0.01. persons per year over the 24-year period up to 2040.

The population of the County in 2016 was 296,214 persons with a housing stock of 104,851 units (from CSO).

The 2026 high range population target of 333,000 persons provides for a population growth per annum of 3,679<sup>1</sup> persons per year. Extrapolating this figure to the year 2023 provides for a population projection of 321,964 persons<sup>2</sup>. Dividing this figure by the projected household size in 2023 which is 2.68 persons<sup>3</sup> provides for an overall housing unit requirement of 120,136 units or a growth of 15,285<sup>4</sup> units to the end of the Fingal Development Plan in 2023.

To date (September 2019), approximately 5,582 units have been granted planning permission in the Fingal area, which leaves a requirement of 8,919 over the remaining

<sup>1</sup> This has been revised from the Variation document, due to a calculation error.

<sup>2</sup> 3,3679 (growth per annum) x 7 (7 years to 2023) = 25,750 + 296,214 (current pop)

<sup>3</sup> 2.75 persons per household in 2016 - 0.01 persons per year (by 7 years to 2023)

<sup>4</sup> 120,136 (projected units) – 104,851 (unit in Census 2016) = 15,285

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lifecycle of the Development Plan. It is considered this is sufficient capacity for further growth in Fingal during this time period.

Since the adoption of the Development Plan in early 2017, activity in the housing sector in Fingal has been growing in a positive manner and currently there are eighty-four active sites which have delivered 4,950 units so far with another 2,400 currently under construction. In 2019, 14 sites were fully completed having delivered 1,290 units.

The bulk of this construction activity is taking place in the 'Dublin City and Suburbs', and 'Metropolitan' area and is in areas with a framework for growth. Fingal has employed a number of policy responses to facilitate housing development, namely the adoption of Local Area Plans and Masterplans across the County. Hansfield Strategic Development Zone (SDZ) in Dublin 15 continues to work as a successful policy tool with approx. 1,000 units occupied to date on the overall SDZ lands since the inception of the scheme.

The LAP's and Masterplans provide a framework for development of larger zoned sites. These set out where Fingal's priorities for growth are and provide a development framework and phasing arrangements which will ensure the delivery of the required social and physical infrastructure in an appropriate manner. In addition, the preparation of these Plans has involved significant local consultation and the engagement of Elected Members, and give a degree of certainty to those involved in the development of their areas.

This policy response is shown to be successful to date. The main areas of construction activity, i.e. Hansfield, Blanchardstown, Swords, Baldoyle, Portmarnock, Donabate and Santry and are the areas with the Strategic Development Zone, Local Area Plans and Masterplans and also where construction and SHD activity is taking place. This clearly shows how the development of Fingal is in line with the National and Regional policy regarding consolidation of development within Dublin City and Suburbs, and within the development boundary of existing towns and urban areas and along public transport corridors.

While the particular LAP's and Masterplans include phasing arrangements which ensure the rate of growth is aligned with the provision of social and physical infrastructure and the growth targets of the RSES, the provision of such plans, in itself, will naturally result in a phasing of land, i.e. those with a framework will be available for development before those without. The snapshot below shows how the phasing arrangement has been approached in relation to the Swords Masterplans:

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Swords is the administrative capital of Fingal. It benefits from direct links to the national road network (M1 and M50) and is located on the Dublin/Belfast economic corridor. Swords is also located within easy travel distance to the key gateways of Dublin Port, via Dublin Port Tunnel, and Dublin Airport, two of the most important economic gateways in the Country. The announcement of the indicative route for the new MetroLink project, which will provide the first direct rail link between Swords, the airport and the City Centre, means that Swords will be extremely well connected to Dublin City's economic and commercial life.

In order to capitalise on this investment in infrastructure, Fingal County Council have prepared Masterplans for Barrysparks & Crowscastle, Fosterstown, and Estuary West. The Masterplans, agreed in May 2019, have been prepared concurrently to ensure a coordinated approach to maximising infrastructural investment. The quantum and form of development in each area is designed to complement that of the other sites and to build on Swords' existing assets.



These Masterplans will provide a significant amount of development. Key to this is phasing. Each Masterplan has its own phasing arrangement which forms a key part of the Plan, Fosterstown is shown below.



Accompanying the Masterplan is a Phasing Schedule. This is required in order to manage the impact of development on the surrounding area and in particular on existing transport infrastructure throughout Swords. The phasing schedule also seeks to provide community infrastructure, such as schools and open space, in the earlier phases of development in order to create a high-quality living and working environment. Table 9.1 sets out the infrastructure required to both create a high-quality living/ working environment and to manage development on the surrounding area.

The table is broken down into both essential and non-essential infrastructure. Essential infrastructure must occur within the phase of development where it is listed before subsequent phases can be constructed and occupied. Non-essential infrastructure lists infrastructure that is anticipated to occur in Swords in the same timeframes but will not hold back future phases of development of the Masterplan should it fail to materialise.

Housing Task Force returns to the Department of Housing, Planning and Local Government show a steady supply of housing since the adoption of the development plan. The number of units completed and occupied since 2016 and the number of units under construction are shown below, as per the HTF return:

Year	Units Completed and Occupied	Under Construction
2016	1026	1767
2017	1378	2200
2018	1830	2527
2019	1805	2192

Over the last 4 years, an average of 2,170 units have been constructed in Fingal each year in locations such as Blanchardstown, Swords, Santry/Northwood, Finglas, Portmarnock, Malahide, Baldoyle, Donabate and Balbriggan. Housing delivery within the metropolitan area and to some extent towns in the core area indicate that Fingal is well positioned to facilitate the right quantity of appropriate housing in the right locations.

The NPF Roadmap population projections already incorporate 25% headroom figures for all parts of the country (Implementation Roadmap for the National Planning Framework, Appendix 2). In Fingal this may be supplemented by additional 25% headroom, (page 5 of the NPF Roadmap). As noted in the RSES, the application of headroom is particularly relevant to urban areas, where the aim is to target at least half of future housing delivery within existing built-up areas.

NPO 68 sets out that up to 20% of the targeted growth for CSO Environs of Dublin city and suburbs should be accommodated in the wider metropolitan area. The RSES states that population transfer as set out in NPO 68 by way of up to 20% of the targeted growth in the city being transferred to other settlements in the MASP shall apply only to the three

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Metropolitan Key Towns in the MASP namely Bray, Maynooth and Swords, and only if they can demonstrate compact growth on high capacity planned or existing public transport corridors. This may result in additional growth for Swords, when agreed by the MASP Implementation Group and may require an amendment in the review of the development plan to be consistent with any figure agreed by the MASP Implementation Group or the Minister in default.

The NPF Implementation Roadmap Circular FPS04/2018 from the Department of Housing Planning and Local Government (DHPLG) states that these 'adjusted' transitional figures will apply to 2026 and will also inform the period to 2031. The adjusted population projections within the MASP will therefore align with the existing timeline of the RSES population targets to 2031

This additional NPO68 related growth, when allocated to Swords, will support the regeneration of underused town centre lands along with the planned and sequential infill opportunities to provide for high density and people intensive uses and will ensure Swords continues to develop as a key location for airport related economic development and employment provision.

It is Fingal's priority, and has been for a period of time, to form effective and innovative approaches to mobilise development to create housing and quality urban neighbourhoods. Consequently, any development undertaken in the County is positioned against the national, regional and local policies and objectives. Therefore, Rebuilding Ireland, the National Planning Framework, the Regional Spatial and Economic Strategy, Fingal Development Plan, LIHAF, the Serviced Sites Fund and other such policies and programmes set the context for future development. These enabling policies are now in place and are facilitating in the delivery of housing across Fingal.

That said, as the economy continues to improve, it is anticipated there will be further demand for housing. It is therefore essential that there is an adequate supply of suitable housing of various types available to facilitate the growth in the economy and to ensure that the output of housing is maintained at a sustainable level that meets the needs of a growing population.

Having regard to the history of housing delivery in Fingal in locations either within Dublin City and Suburbs, within Swords Key Town and proximate to high quality public transport in the metropolitan area, and to a lesser extent in similar well served locations within the Core area, Fingal County Council aims to continue to manage sustainable growth in the settlement typologies within the County.

### **Metropolitan Area**

#### **Dublin City and Suburbs**

##### *Blanchardstown*

The town has a large commercial centre, with a number of distinctive residential areas. Served by the Dublin Maynooth and Dunboyne Railway lines, with expected DART services in the medium term. Development land proximate to railway stations will provide planned development through existing or proposed LAPs and through use of active lands

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management. Objectives Blanchardstown 1- 17 within the Development Plan reflect the status of the town and drive consolidation, densification public realm improvement. Having regard to the status of Blanchardstown and the level of delivery of housing so far, the level of development permitted and capable of being accommodated, a 15% increase in population is appropriate.

### *Portmarnock*

Lands proximate to the DART station are delivering housing within an LAP framework. The lands are served by much improved cycling infrastructure and access to high quality parkland and coastal amenity. Ongoing housing construction and delivery through LAP phasing is taking place. 9% population growth to 2023 is appropriate.

### *Baldoyle/Sutton*

Part of the Dublin City and Suburbs settlement, this part of Fingal is served by the DART. At Stapolin, development is being delivered through the LAP, with a station in situ. The village centre is being delivered along with regional parkland. Having regard to the ongoing delivery of housing and phasing, it is considered that 8% population growth is appropriate.

### *Howth*

Howth is afforded a high degree of protection as a consequence of its SAAO and European Site designations. It is served by a DART station and is within the Dublin City and Suburbs area. Benefiting from a village of significant character, brownfield and consolidation lands are available for development proximate to the DART station. A 7% population growth is appropriate.

### *Santry/Northwood/Finglas*

This development area has been providing ongoing housing development in tandem with employment on an ongoing basis. Having regard to the future servicing of the land by the Northwood Metrolink Station and Busconnects and proximity to employment at Ballymun, Charlesland, and Dublin Airport, it is considered that 8% population growth will ensure ongoing housing provision.

### **Key Town**

#### *Swords*

Swords currently provides for a significant employment base, reflecting its location proximate to the M1, M50 and Dublin Airport. The Development Strategy for the town is of consolidation, active land management, employment generation and residential development centred around regeneration of the town centre and high-quality public transport in the form of Metrolink and Busconnects. Development will be appropriately managed through the provision of LAPs and Masterplans. Having regard to the status of the Key Town designation and the ongoing delivery of housing within Swords, a 15% increase in population is appropriate.

### **Self Sustaining Growth Town**

#### *Donabate*

Development in Donabate is set against the policies and objectives of the Fingal Development Plan 2017 – 2023 and the Donabate Local Area Plan 2016 – 2022. Together



these documents identify the strategic spatial planning issues and the vision for structured development and balanced growth for Donabate. The area is identified in the RSES as a 'self-sustaining growth' town and part of the North – South Strategic Development Corridor. The development strategy is to promote the creation of a vibrant town core by providing a high-quality living environment for the existing and future population and providing for the development of the necessary community, commercial, cultural and social facilities in tandem with new residential development and accordingly a 10% increase in population is appropriate.

### **Self Sustaining Town**

#### *Malahide*

The settlement contains a strong village centre structure with a regional park and access to a high level of local amenities. The settlement is served by the DART. Housing delivery has been provided at a steady pace on local area plan lands. Development on remaining lands is required to be undertaken by a masterplanning process. Having regard to the limited area of land remaining, a 5% population figure is considered acceptable.

#### *Towns and Villages*

Within the Metropolitan Area, limited development is occurring outside of the areas indicated above. Local Area Plans have been provided for rural villages such as Kinsealy and Rivermeade, within which phasing will control development at appropriate levels. It is considered that a 5% population increase will facilitate appropriate development levels within the towns and villages in the metropolitan area.

### **Core Area**

#### **Self-Sustaining Towns**

##### *Balbriggan*

Balbriggan is a self-sustaining town of significant scale with a well-defined town centre. It is acknowledged that employment development in the town is required to create a more sustainable community. The town is served by a railway line, has access to a regional park and harbour and contains significant employment zoned lands, including the most significant High Technology zoned landbank in the 'Core' area. Residential development is being delivered at a steady rate within the town in recent years. The regeneration of the town is a key aim of FCC and is being managed through the targeted 'Our Balbriggan' strategy for improved public realm, active land management and public spaces to provide a robust vibrant centre. Objectives Balbriggan 1- 15 in the Development Plan set out the assets to be developed to aid sustainable growth in the settlement. Having regard to the scale of the town and the ongoing strategies underway, it is considered that 8% growth is sustainable.

##### *Rush*

The aim of the Development Plan is to expand the commercial, retail and employment within Rush. The suite of Objectives 1 – 21 for Rush set out the sustainable development context for the settlement, including the regeneration and improvement of the town centre. Having regard to the level of housing development which has taken place in Rush, it is considered that a 5% growth level is appropriate.

##### *Skerries*

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Skerries is a compact coastal town served by a railway station. Benefiting from a well defined town centre and access to coastal amenities and a regional park, it is considered that future residential development would be managed through a masterplanning process. A 5% growth rate is considered appropriate having regard to the need to manage growth in line with the existing population.

### *Lusk*

The development strategy for Lusk within the Development Plan reflects its status as a self-sustaining town, with objectives to protect the character of the historic core, to consolidate development within well defined boundaries, provide retail at an appropriate level for the towns needs. Having regard to the level of development undertaken in the town, it is considered that a 5% growth projection is appropriate.

### *Towns and Villages*

The other settlements within the Core area are rural villages and the towns of Balrothery and Loughshinny. It is an objective of the Development Plan that all villages have a Local Area Plan. Local Area Plans guide and phase development in such locations. Growth of housing in these settlements is at a moderate pace, generally managed by LAPs. It is considered that 4% increase is an appropriate rate to ensure that growth is managed in accordance with the capacity of the villages.

### *Countywide Rural*

As per the Rural Settlement Strategy in the Development Plan, it is the objective of FCC to rural generated housing requirements of the local rural community. Having regard to the location of the county, the provision of suitable sites within Rural Clusters and the modest growth expected outside of urban areas, it is considered that a 2% growth in the population of rural Fingal is commensurate.

The settlement descriptions above set out the targeted growth rate across each settlement within the County. These growth rate allocations are in support of the on-going development of the County in accordance with the NPF and the RSES. Fingal County Council is committed to ensure the County and settlements develop in a sustainable way and supports the key principles of healthy placemaking, climate action and economic opportunity and has allocated growth rates accordingly.

The RSES indicates that Local Authorities should consider lands with better prospects for delivery in the short term whilst also pursuing the more strategic lands through an Active Land Management Strategy. This was underlying basis of the growth strategy outlined above and consequently, lands which are actively delivering housing, have valid planning permissions and have infrastructure capacity have been allocated the largest percentage of growth. These factors, coupled with the settlement's location in the core or the metropolitan area were part of this decision process.

Fingal County Council and the Development Plan process are currently within a transitional phase. The Development Plan review process formally commences in 12 months. Analysis of the issues required to be addressed in the Development Plan are commencing imminently and will deal with issues as varied as adaptation and mitigation for climate

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change, housing provision, planning for an aging society, regeneration of centres, green networks, sustainable infrastructural systems, while continuing important themes such as compact growth, economic development and placemaking. These matters along with HNDA, will be provided in significant detail during the development plan review process.

An evaluation of all undeveloped residential lands in each settlement will be carried out as part of the formal review of the Development Plan. In the meantime, and as shown above, new residential development will be focused on appropriately zoned lands within the County, within appropriate locations proximate to existing settlement centre lands where infrastructural capacity is readily available, and they are along an existing or proposed high quality public transport corridors and on appropriate infill sites in the town centres, in a phased manner alongside the delivery of appropriate physical and social infrastructure.

Furthermore, the zoning of land in the forthcoming Development Plan and any other land use plan shall comply with the requirements as detailed in Appendix 3 of the NPF relating to a methodology for a tiered approach to land zoning. This methodology requires that land should not be zoned for development unless there is existing service capacity available (Tier 1) or the lands have the potential to become fully serviceable (Tier 2) during the life of the plan. Future land use plans shall therefore contain a detailed Infrastructural Assessment for residential land that provides for an evidence-based approach to the servicing of potential sites to establish their suitability for zoning. Other planning considerations such as the overall planned levels of growth, location, suitability for the type of development envisaged, availability of and proximity to amenities, schools, shops or employment, accessibility to transport services, etc., shall also be considered. The NPF also requires that land use plans target of 50% of all new homes within or contiguous to the built up area of Dublin City and Suburbs and at least 30% in other settlements. The built-up footprints have been defined by the CSO in the Census of Population

Include new objectives in Chapter 2 and 12 to read:

- Objective SS 02a  
Development will be permitted in principle on lands where there is a Local Area Plan or Masterplan in place and only when these lands are substantially developed will permission be granted for the development of lands without such a framework. Should the lands identified within a LAP or Masterplan not come forward for development in the short term, consideration will be given to other lands.
- Objective SS 02b  
Focus new residential development on appropriately zoned lands within the County, within appropriate locations proximate to existing settlement centre lands where infrastructural capacity is readily available, and they are along an existing or proposed high quality public transport corridors and on appropriate infill sites in the town centres, in a phased manner alongside the delivery of appropriate physical and social infrastructure.

Objective DMS03a

Submit a detailed statement for developments on land zoned residential or mixed use, in excess of 100 residential units outlining:

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- Compliance with the sequential approach in relation to development of the area,
- Potential for sustainable compact growth
- The scale of employment provision and commuting flows
- Extent of local services provision i.e. administration, education- particularly third level, health, retail and amenities
- Transport accessibility
- Environmental sensitivities, resources and assets and
- Current and planned infrastructure capacity

Section 10 (2A) of the Planning and Development Act requires that a core strategy outlines a settlement hierarchy. It is recommended the text is amended throughout the Variation accordingly.

The Planning and Development Act clearly requires that the core strategy and housing strategy of every development plan must show they are consistent with the NPF, the RSES and SPPR in guidelines issued under Section 28 of the Act. That said, it is recommended the following statement is included in Section 1.2 of the Development Plan.

Where any objectives of the Development Plan are considered to be materially inconsistent with those of the National Planning Framework, the Regional Spatial and Economic Strategy or the Specific Policy Requirements of Guidelines issued under Section 28 of the Act, the aforementioned documents shall take precedence.

It is recommended the following text will replace page 38 and 39 of the current development plan (and page 32-33 of the Variation document):

While Table 2.8 outlines the potential to deliver 43,104 units, it must be interpreted in the County Fingal context, in that the land will become available on a phased basis. The key tenet of the overall Settlement Strategy is the continued promotion of sustainable development through positively encouraging consolidation and densification of the existing urban built form – and thereby maximising efficiencies from already established physical and social infrastructure. This principle of compact growth and regeneration is also a key facet of the NPF and the RSES.

We recognise this level of development is unlikely to be developed over the lifetime of this County Development Plan rather it outlines the optimal sustainable development strategy for the County over a much longer time period and can only be developed in tandem with the timely delivery of the necessary physical and social infrastructure.

As outlined earlier in this Chapter, Appendix 2 of the NPF Implementation Roadmap identifies a population of 333,000 persons in 2026 and 349,000 persons in 2031 for Fingal. These figures are confirmed in Appendix B of the adopted RSES. Any review of the Development Plan will be required to address these figures and a revised Core Strategy will be developed.

This represents a growth of 8.7% across Fingal. Without prejudice to the future, for the purposes of this Variation, it is expected that Fingal will growth for the remaining period of

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the Development Plan. Having regard to the locations of active sites and planning permissions, it is expected a higher rate of growth will occur in the Metropolitan area, versus the Core area.

This Variation must in the short-term plan for an additional 15,285 housing units. These units shall be located at appropriate locations proximate to existing settlement centre lands where infrastructural capacity is readily available, and they are along an existing or proposed high quality public transport corridor.

There are also areas within the existing footprint of the settlements which will allow for smaller schemes through infill and town centre regeneration.

The identification of the lands at Lissenhall as longer-term development reflects the significant short-medium term physical and social infrastructural constraints associated with the development of this area such as the provision of MetroLink and a LAP.

It is also noted that the housing capacity allocated to Hansfield SDZ could be excluded from the total figures, as per the DoEHLG *Guidance Notes on Core Strategies* issued in November 2010. The DoEHLG state that 'any excess (of lands or housing capacity) will not normally include lands identified for the strategic long-term development as part of Strategic Development Zones or major regeneration sites within key areas...'. Notwithstanding this, in order to identify the full potential of zoned lands within the County these figures have been included in Tables 2.6 and 2.8.

The development of the strategic lands at Lissenhall will be subject to a Local Area Plan, SEA and Appropriate Assessment and will also be dependent on the concurrent delivery of adequate water services and upgraded /planned public transport infrastructure.

In relation to the development of other lands within the County, Local Area Plans, the SDZ at Hansfield, and Masterplans, will establish more detailed phasing or prioritisation for the delivery of residential uses, other uses, or infrastructure, as appropriate. Such locally-based plans and related requirements are set out in Chapter 4, Urban Fingal.

In Chapter 3, Placemaking, include additional text in the Strategic Development Zones, Local Area Plans and Masterplan Section.

It is Fingal's priority to form effective and innovative approaches to mobilise development land to create housing and quality urban neighbourhoods. Consequently, any development, is positioned against the national, regional and local policies and objectives. Facilitating the provision of the right quantity of appropriate housing in the right locations that is accessible for all residents is crucial for Fingal County Council.

The provision of housing in Fingal must be in line with the National Planning Framework's and the Regional Spatial and Economic Strategy's projected population for the County. As indicated in Chapter 2 of this Development Plan, development will only be permitted on lands where there is a development framework, such as a Local Area Plan or a Masterplan, in place. This policy, in itself, will naturally result in a phasing of land, i.e. those with a framework will be available for development before those without.

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To ensure the development of sustainable communities that are economically, environmentally and socially healthy and resilient, all future Local Area Plans and Masterplans will be required to outline specific phasing arrangements. These policies enable the delivery of quality dwellings and help create and maintain sustainable communities and neighbourhoods. The phasing arrangements should be founded on sequential development from the centre out and an asset based approach. This approach would outline the social, economic and natural assets that are required within a settlement to ensure the proposed growth is sustainable in the longer term. This will ensure that settlements identified for significant population and/ or employment growth are supported by the requisite investment in infrastructure and provision of employment, amenities and services at the right time.

The Settlement Hierarchy as shown in the Variation was intended to reflect the status of Swords as the County Town of Fingal County Council. However, it is recommended that Table 2.9 and Figure 2.3 is edited as per recommendation no. 5 and shown below.

<b>Metropolitan Area</b>	<b>Core Area</b>
<b>Dublin City and Suburbs Consolidation Area</b> Blanchardstown	
<b>Consolidation Areas Within Dublin City and Suburbs</b> Baldoyle, Castleknock, Clonsilla, Howth, Baskin, Mulhuddart Village, Portmarnock, Sutton, Santry (Incl. Ballymun) Balgriffin & Belcamp Charlestown & Meakstown	
<b>Key Town</b> Swords	
<b>Self Sustaining Growth Towns</b> Donabate Malahide	<b>Self Sustaining Towns</b> Balbriggan Lusk Rush Skerries
<b>Towns and Villages</b> Portrane Coolquay Kinsealy Rivermeade Rowlestown	<b>Other Core Towns and Villages</b> Balrothery Loughshinny Ballyboghil Naul Balcadden Oldtown Garristown

**Rural – Clusters and Rural Area**

See Chapter 5 entitled ‘Rural Fingal’ for a full list of rural clusters

**Figure 2.3**



Both the NPF and the RSES outline policies and objectives in relation to compact growth and consolidation. One of the ten National Strategic Outcomes in the NPF is compact growth. The NPF outlines that carefully managing the sustainable growth of compact cities, towns and villages will add value and create more attractive places in which people can live and work. In the RSES, compact growth and regeneration is set out as one of the Regional Strategic Outcomes.

One of the overarching aims of the Fingal Development Plan and stated throughout the Plan, from the vision statement in chapter one to development management standards in chapter 12, is the need to consolidate urban areas to provide a vibrant, attractive environment for living and working, facilitating efficient movement by sustainable modes of transport throughout the County. There are numerous objectives throughout the Plan seeking this:

**Chapter 1**

**Strategic Vision**

*Consolidate urban areas to provide a vibrant, attractive environment for living and working, facilitating efficient movement by sustainable modes of transport throughout the County.*

**Main Aims**

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4. *Promote an appropriate balance of development across the County, by developing a hierarchy of high quality, vibrant urban centres and clearly delineated areas of growth, and favouring expansion in areas nearest to existing or planned public transport nodes.*

5. *Ensure an adequate supply of zoned lands to meet forecasted and anticipated economic and social needs, while avoiding an oversupply which would lead to fragmented development, dissipated infrastructural provision and urban sprawl.*

### **Strategic Policy:**

4. *Promote and facilitate the long-term consolidation and growth of the County town of Swords as provided for in the Swords Strategic Vision 2035.*

5. *Consolidate the growth of the major centres of Blanchardstown and Balbriggan by encouraging infill development and intensification of development within appropriate locations.*

6. *Consolidate development and protect the unique identities of the settlements of Howth, Sutton, Baldoyle, Portmarnock, Malahide, Donabate, Lusk, Rush and Skerries.*

### **Chapter 2**

#### *Objective SS01*

*Consolidate the vast majority of the County's future growth into the strong and dynamic urban centres of the Metropolitan Area while directing development in the hinterland to towns and villages, as advocated by national and regional planning guidance.*

#### *Objective SS03*

*Identify sufficient lands for residential development in order to achieve the housing and population targets set out in the Core Strategy, while ensuring that excess lands surplus to this specific requirement are not identified, in order to prevent fragmented development, uneconomic infrastructure provision and car dependent urban sprawl.*

#### *Objective SS08*

*Strengthen greenbelt lands by identifying opportunities for infill development and consolidation of existing towns to reduce the need to zone additional greenfield lands and ensure the preservation of strategic greenbelts between our towns and villages.*

#### *Objective SS15*

*Strengthen and consolidate existing urban areas adjoining Dublin City through infill and appropriate brownfield redevelopment in order to maximise the efficient use of existing infrastructure and services.*

### **Chapter 3**

#### **Design Criteria for Residential Development**

##### **Background**

*The Development Plan sets out to ensure that an adequate amount of land is available for residential development in line with national and regional population projections. A key*



*facet of the Development Plan is consolidation of the residential land in the existing urban and village areas.*

### **Educational Facilities**

*The continued use and possible intensification of existing social infrastructure including schools is encouraged and is consistent with the consolidation strategy of the Plan.*

### **Objective PM03**

*Identify obsolete and potential renewal areas within the County and encourage and facilitate the re-use and regeneration of derelict land and buildings in the County's urban centres.*

Chapter 4 outlines area specific objectives and so on throughout the Development Plan.

These objectives of consolidation and compact growth, and utilising brownfield and infill sites continue throughout the Development Plan. However, in response to the recommendation, it is recommended a further objective is included in Chapter 2 of the Development Plan which states:

### **Objective SS01a**

Support the implementation of and promote development consistent with the National Strategic Outcome of Compact Growth as outlined in the NPF and the Regional Strategic Outcome of Compact Growth and Regeneration as set out in the RSES.

Objective PM42 states:

The Guidelines for Planning Authorities 'Sustainable Urban Housing: Design Standards for New Apartments', 2015 issued by the then Minister for the Environment, Community and Local Government under Section 28 of the Planning and Development Act, 2000 (as amended) are required to be applied by the Planning Authority in carrying out its functions.

It is recommended this is replaced to include reference to the latest apartment guidelines and the 'Urban Development and Building Heights Guidelines' (December, 2018), as follows: Implement the policies and objectives of the Minister in respect of 'Urban Development and Building Heights Guidelines' (December, 2018) and Sustainable Urban Housing: Design Standards for New Apartments (March, 2018) issued under section 28 of the Planning and Development Act, as amended.

### **Recommendation**

1. In order to comply with recommendations 1, 3 and 4, it is recommended Section 2.5 is amended as follows:

### **New Section 2.5 Housing and Population Targets**

The RSES translates the national and regional population targets set by the NPF to county level. Development Plans are required to be consistent with these targets. The approach in the core strategies is to realise these population targets which will be informed

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by the transitional population projections methodology set out in the NPF Roadmap, Appendix 2, and a robust evidence based analysis of demand, past delivery and potential.

As part of the approach of achieving consistency with targets of the RSES and the NPF, this core strategy seeks to achieve compliance with national and regional policy, will provide a policy framework for the concentration of development, co-ordinate infrastructural investment and facilitate the population growth outlined in the RSES and shown below.

Fingal County Council	CENSUS 2016	2026 Range		2031 Range	
		Low	High	Low	High
Dublin NPF Road Map	1,347,500	1,489,000	1,517,500	1,549,500	1,590,000
RSES Fingal Allocation	296,000	327,000	333,000	340,000	349,000
<del>RSES Adjusted Transitional Population Projections for MASP</del>		<del>327,000</del>	<del>333,000</del>	<del>340,000</del>	<del>349,000</del>
<i>Source: NPF/RSES and CSO Census</i>					

Table 6.2 above provides details of the population figures for the Dublin Region, extracted from the NPF Implementation Roadmap alongside figures for Fingal County Council, extracted from Appendix B of the RSES, Strategic Planning Area (SPA) and County Population Tables.

The NPF indicates that the average household size in 2016 of 2.75 persons per household is expected to decline to 2.5 persons by 2040 resulting in an average household size decline of 0.01. persons per year over the 24-year period up to 2040.

The population of the County in 2016 was 296,214 persons with a housing stock of 104,851 units (from CSO).

The 2026 high range population target of 333,000 persons provides for a population growth per annum of 3,679<sup>5</sup> persons per year. Extrapolating this figure to the year 2023 provides for a population projection of 321,964 persons<sup>6</sup>. Dividing this figure by the projected household size in 2023 which is 2.68 persons<sup>7</sup> provides for an overall housing unit requirement of 120,136 units or a growth of 15,285<sup>8</sup> units to the end of the Fingal Development Plan in 2023.

To date (September 2019), approximately 5,582 units have been granted planning permission in the Fingal area, which leaves a requirement of 8,919 over the remaining lifecycle of the Development Plan. It is considered this is sufficient capacity for further growth in Fingal during this time period.

<sup>5</sup> This has been revised from the Variation document, due to a calculation error.

<sup>6</sup>  $3,3679 \text{ (growth per annum)} \times 7 \text{ (7 years to 2023)} = 25,750 + 296,214 \text{ (current pop)}$

<sup>7</sup>  $2.75 \text{ persons per household in 2016} - 0.01 \text{ persons per year (by 7 years to 2023)}$

<sup>8</sup>  $120,136 \text{ (projected units)} - 104,851 \text{ (unit in Census 2016)} = 15,285$

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Since the adoption of the Development Plan in early 2017, activity in the housing sector in Fingal has been growing in a positive manner and currently there are eighty-four active sites which have delivered 4,950 units so far with another 2,400 currently under construction. In 2019, 14 sites were fully completed having delivered 1,290 units.

The bulk of this construction activity is taking place in the ‘Dublin City and Suburbs’, and ‘Metropolitan’ area and is in areas with a framework for growth. Fingal has employed a number of policy responses to facilitate housing development, namely the adoption of Local Area Plans and Masterplans across the County. Hansfield Strategic Development Zone (SDZ) in Dublin 15 continues to work as a successful policy tool with approx. 1,000 units occupied to date on the overall SDZ lands since the inception of the scheme.

The LAP’s and Masterplans provide a framework for development of larger zoned sites. These set out where Fingal’s priorities for growth are and provide a development framework and phasing arrangements which will ensure the delivery of the required social and physical infrastructure in an appropriate manner. In addition, the preparation of these Plans has involved significant local consultation and the engagement of Elected Members, and give a degree of certainty to those involved in the development of their areas.

This policy response is shown to be successful to date. The main areas of construction activity, i.e. Hansfield, Blanchardstown, Swords, Baldoyle, Portmarnock, Donabate and Santry and are the areas with the Strategic Development Zone, Local Area Plans and Masterplans and also where construction and SHD activity is taking place. This clearly shows how the development of Fingal is in line with the National and Regional policy regarding consolidation of development within Dublin City and Suburbs, and within the development boundary of existing towns and urban areas and along public transport corridors.

While the particular LAP’s and Masterplans include phasing arrangements which ensure the rate of growth is aligned with the provision of social and physical infrastructure and the growth targets of the RSES, the provision of such plans, in itself, will naturally result in a phasing of land, i.e. those with a framework will be available for development before those without. The snapshot below shows how the phasing arrangement has been approached in relation to the Swords Masterplans:

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Swords is the administrative capital of Fingal. It benefits from direct links to the national road network (M1 and M50) and is located on the Dublin/Belfast economic corridor. Swords is also located within easy travel distance to the key gateways of Dublin Port, via Dublin Port Tunnel, and Dublin Airport, two of the most important economic gateways in the Country. The announcement of the indicative route for the new MetroLink project, which will provide the first direct rail link between Swords, the airport and the City Centre, means that Swords will be extremely well connected to Dublin City's economic and commercial life.

In order to capitalise on this investment in infrastructure, Fingal County Council have prepared Masterplans for Barrysparks & Crowscastle, Fosterstown, and Estuary West. The Masterplans, agreed in May 2019, have been prepared concurrently to ensure a coordinated approach to maximising infrastructural investment. The quantum and form of development in each area is designed to complement that of the other sites and to build on Swords' existing assets.



These Masterplans will provide a significant amount of development. Key to this is phasing. Each Masterplan has its own phasing arrangement which forms a key part of the Plan, Fosterstown is shown below.



Accompanying the Masterplan is a Phasing Schedule. This is required in order to manage the impact of development on the surrounding area and in particular on existing transport infrastructure throughout Swords. The phasing schedule also seeks to provide community infrastructure, such as schools and open space, in the earlier phases of development in order to create a high-quality living and working environment. Table 9.1 sets out the infrastructure required to both create a high-quality living/ working environment and to manage development on the surrounding area.

The table is broken down into both essential and non-essential infrastructure. Essential infrastructure must occur within the phase of development where it is listed before subsequent phases can be constructed and occupied. Non-essential infrastructure lists infrastructure that is anticipated to occur in Swords in the same timeframes but will not hold back future phases of development of the Masterplan should it fail to materialise.

Housing Task Force returns to the Department of Housing, Planning and Local Government show a steady supply of housing since the adoption of the development plan. The number of units completed and occupied since 2016 and the number of units under construction are shown below, as per the HTF return:

Year	Units Completed and Occupied	Under Construction
2016	1026	1767
2017	1378	2200
2018	1830	2527
2019	1805	2192

Over the last 4 years, an average of 2,170 units have been constructed in Fingal each year in locations such as Blanchardstown, Swords, Santry/Northwood, Finglas, Portmarnock, Malahide, Baldoyle, Donabate and Balbriggan. Housing delivery within the metropolitan area and to some extent towns in the core area indicate that Fingal is well positioned to facilitate the right quantity of appropriate housing in the right locations.

The NPF Roadmap population projections already incorporate 25% headroom figures for all parts of the country (Implementation Roadmap for the National Planning Framework, Appendix 2). In Fingal this may be supplemented by additional 25% headroom, (page 5 of the NPF Roadmap). As noted in the RSES, the application of headroom is particularly relevant to urban areas, where the aim is to target at least half of future housing delivery within existing built-up areas.

NPO 68 sets out that up to 20% of the targeted growth for CSO Environs of Dublin city and suburbs should be accommodated in the wider metropolitan area. The RSES states that population transfer as set out in NPO 68 by way of up to 20% of the targeted growth in the city being transferred to other settlements in the MASP shall apply only to the three

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Metropolitan Key Towns in the MASP namely Bray, Maynooth and Swords, and only if they can demonstrate compact growth on high capacity planned or existing public transport corridors. This may result in additional growth for Swords, when agreed by the MASP Implementation Group and may require an amendment in the review of the development plan to be consistent with any figure agreed by the MASP Implementation Group or the Minister in default.

The NPF Implementation Roadmap Circular FPS04/2018 from the Department of Housing Planning and Local Government (DHPLG) states that these 'adjusted' transitional figures will apply to 2026 and will also inform the period to 2031. The adjusted population projections within the MASP will therefore align with the existing timeline of the RSES population targets to 2031

This additional NPO68 related growth, when allocated to Swords, will support the regeneration of underused town centre lands along with the planned and sequential infill opportunities to provide for high density and people intensive uses and will ensure Swords continues to develop as a key location for airport related economic development and employment provision.

It is Fingal's priority, and has been for a period of time, to form effective and innovative approaches to mobilise development to create housing and quality urban neighbourhoods. Consequently, any development undertaken in the County is positioned against the national, regional and local policies and objectives. Therefore, Rebuilding Ireland, the National Planning Framework, the Regional Spatial and Economic Strategy, Fingal Development Plan, LIHAF, the Serviced Sites Fund and other such policies and programmes set the context for future development. These enabling policies are now in place and are facilitating in the delivery of housing across Fingal.

That said, as the economy continues to improve, it is anticipated there will be further demand for housing. It is therefore essential that there is an adequate supply of suitable housing of various types available to facilitate the growth in the economy and to ensure that the output of housing is maintained at a sustainable level that meets the needs of a growing population.

Having regard to the history of housing delivery in Fingal in locations either within Dublin City and Suburbs, within Swords Key Town and proximate to high quality public transport in the metropolitan area, and to a lesser extent in similar well served locations within the Core area, Fingal County Council aims to continue to manage sustainable growth in the settlement typologies within the County.

### **Metropolitan Area**

#### **Dublin City and Suburbs**

##### *Blanchardstown*

The town has a large commercial centre, with a number of distinctive residential areas. Served by the Dublin Maynooth and Dunboyne Railway lines, with expected DART services in the medium term. Development land proximate to railway stations will provide planned development through existing or proposed LAPs and through use of active lands

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management. Objectives Blanchardstown 1- 17 within the Development Plan reflect the status of the town and drive consolidation, densification public realm improvement. Having regard to the status of Blanchardstown and the level of delivery of housing so far, the level of development permitted and capable of being accommodated, a 15% increase in population is appropriate.

### *Portmarnock*

Lands proximate to the DART station are delivering housing within an LAP framework. The lands are served by much improved cycling infrastructure and access to high quality parkland and coastal amenity. Ongoing housing construction and delivery through LAP phasing is taking place. 9% population growth to 2023 is appropriate.

### *Baldoyle/Sutton*

Part of the Dublin City and Suburbs settlement, this part of Fingal is served by the DART. At Stapolin, development is being delivered through the LAP, with a station in situ. The village centre is being delivered along with regional parkland. Having regard to the ongoing delivery of housing and phasing, it is considered that 8% population growth is appropriate.

### *Howth*

Howth is afforded a high degree of protection as a consequence of its SAAO and European Site designations. It is served by a DART station and is within the Dublin City and Suburbs area. Benefiting from a village of significant character, brownfield and consolidation lands are available for development proximate to the DART station. A 7% population growth is appropriate.

### *Santry/Northwood/Finglas*

This development area has been providing ongoing housing development in tandem with employment on an ongoing basis. Having regard to the future servicing of the land by the Northwood Metrolink Station and Busconnects and proximity to employment at Ballymun, Charlesland, and Dublin Airport, it is considered that 8% population growth will ensure ongoing housing provision.

### **Key Town**

#### *Swords*

Swords currently provides for a significant employment base, reflecting its location proximate to the M1, M50 and Dublin Airport. The Development Strategy for the town is of consolidation, active land management, employment generation and residential development centred around regeneration of the town centre and high-quality public transport in the form of Metrolink and Busconnects. Development will be appropriately managed through the provision of LAPs and Masterplans. Having regard to the status of the Key Town designation and the ongoing delivery of housing within Swords, a 15% increase in population is appropriate.

### **Self Sustaining Growth Town**

#### *Donabate*

Development in Donabate is set against the policies and objectives of the Fingal Development Plan 2017 – 2023 and the Donabate Local Area Plan 2016 – 2022. Together

these documents identify the strategic spatial planning issues and the vision for structured development and balanced growth for Donabate. The area is identified in the RSES as a 'self-sustaining growth' town and part of the North – South Strategic Development Corridor. The development strategy is to promote the creation of a vibrant town core by providing a high-quality living environment for the existing and future population and providing for the development of the necessary community, commercial, cultural and social facilities in tandem with new residential development and accordingly a 10% increase in population is appropriate.

### **Self Sustaining Town**

#### *Malahide*

The settlement contains a strong village centre structure with a regional park and access to a high level of local amenities. The settlement is served by the DART. Housing delivery has been provided at a steady pace on local area plan lands. Development on remaining lands is required to be undertaken by a masterplanning process. Having regard to the limited area of land remaining, a 5% population figure is considered acceptable.

#### *Towns and Villages*

Within the Metropolitan Area, limited development is occurring outside of the areas indicated above. Local Area Plans have been provided for rural villages such as Kinsealy and Rivermeade, within which phasing will control development at appropriate levels. It is considered that a 5% population increase will facilitate appropriate development levels within the towns and villages in the metropolitan area.

### **Core Area**

#### **Self-Sustaining Towns**

##### *Balbriggan*

Balbriggan is a self-sustaining town of significant scale with a well-defined town centre. It is acknowledged that employment development in the town is required to create a more sustainable community. The town is served by a railway line, has access to a regional park and harbour and contains significant employment zoned lands, including the most significant High Technology zoned landbank in the 'Core' area. Residential development is being delivered at a steady rate within the town in recent years. The regeneration of the town is a key aim of FCC and is being managed through the targeted 'Our Balbriggan' strategy for improved public realm, active land management and public spaces to provide a robust vibrant centre. Objectives Balbriggan 1- 15 in the Development Plan set out the assets to be developed to aid sustainable growth in the settlement. Having regard to the scale of the town and the ongoing strategies underway, it is considered that 8% growth is sustainable.

##### *Rush*

The aim of the Development Plan is to expand the commercial, retail and employment within Rush. The suite of Objectives 1 – 21 for Rush set out the sustainable development context for the settlement, including the regeneration and improvement of the town centre. Having regard to the level of housing development which has taken place in Rush, it is considered that a 5% growth level is appropriate.

##### *Skerries*

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Skerries is a compact coastal town served by a railway station. Benefiting from a well defined town centre and access to coastal amenities and a regional park, it is considered that future residential development would be managed through a masterplanning process. A 5% growth rate is considered appropriate having regard to the need to manage growth in line with the existing population.

### *Lusk*

The development strategy for Lusk within the Development Plan reflects its status as a self-sustaining town, with objectives to protect the character of the historic core, to consolidate development within well defined boundaries, provide retail at an appropriate level for the towns needs. Having regard to the level of development undertaken in the town, it is considered that a 5% growth projection is appropriate.

### *Towns and Villages*

The other settlements within the Core area are rural villages and the towns of Balrothery and Loughshinny. It is an objective of the Development Plan that all villages have a Local Area Plan. Local Area Plans guide and phase development in such locations. Growth of housing in these settlements is at a moderate pace, generally managed by LAPs. It is considered that 4% increase is an appropriate rate to ensure that growth is managed in accordance with the capacity of the villages.

### *Countywide Rural*

As per the Rural Settlement Strategy in the Development Plan, it is the objective of FCC to rural generated housing requirements of the local rural community. Having regard to the location of the county, the provision of suitable sites within Rural Clusters and the modest growth expected outside of urban areas, it is considered that a 2% growth in the population of rural Fingal is commensurate.

The settlement descriptions above set out the targeted growth rate across each settlement within the County. These growth rate allocations are in support of the on-going development of the County in accordance with the NPF and the RSES. Fingal County Council is committed to ensure the County and settlements develop in a sustainable way and supports the key principles of healthy placemaking, climate action and economic opportunity and has allocated growth rates accordingly.

The RSES indicates that Local Authorities should consider lands with better prospects for delivery in the short term whilst also pursuing the more strategic lands through an Active Land Management Strategy. This was underlying basis of the growth strategy outlined above and consequently, lands which are actively delivering housing, have valid planning permissions and have infrastructure capacity have been allocated the largest percentage of growth. These factors, coupled with the settlement's location in the core or the metropolitan area were part of this decision process.

Fingal County Council and the Development Plan process are currently within a transitional phase. The Development Plan review process formally commences in 12 months. Analysis of the issues required to be addressed in the Development Plan are commencing imminently and will deal with issues as varied as adaptation and mitigation for climate



change, housing provision, planning for an aging society, regeneration of centres, green networks, sustainable infrastructural systems, while continuing important themes such as compact growth, economic development and placemaking. These matters along with HNDA, will be provided in significant detail during the development plan review process.

An evaluation of all undeveloped residential lands in each settlement will be carried out as part of the formal review of the Development Plan. In the meantime, and as shown above, new residential development will be focused on appropriately zoned lands within the County, within appropriate locations proximate to existing settlement centre lands where infrastructural capacity is readily available, and they are along an existing or proposed high quality public transport corridors and on appropriate infill sites in the town centres, in a phased manner alongside the delivery of appropriate physical and social infrastructure.

Furthermore, the zoning of land in the forthcoming Development Plan and any other land use plan shall comply with the requirements as detailed in Appendix 3 of the NPF relating to a methodology for a tiered approach to land zoning. This methodology requires that land should not be zoned for development unless there is existing service capacity available (Tier 1) or the lands have the potential to become fully serviceable (Tier 2) during the life of the plan. Future land use plans shall therefore contain a detailed Infrastructural Assessment for residential land that provides for an evidence-based approach to the servicing of potential sites to establish their suitability for zoning. Other planning considerations such as the overall planned levels of growth, location, suitability for the type of development envisaged, availability of and proximity to amenities, schools, shops or employment, accessibility to transport services, etc., shall also be considered. The NPF also requires that land use plans target of 50% of all new homes within or contiguous to the built up area of Dublin City and Suburbs and at least 30% in other settlements. The built-up footprints have been defined by the CSO in the Census of Population

Include new objectives in Chapter 2 and 12 to read:

- Objective SS 02a  
Development will be permitted in principle on lands where there is a Local Area Plan or Masterplan in place and only when these lands are substantially developed will permission be granted for the development of lands without such a framework. Should the lands identified within a LAP or Masterplan not come forward for development in the short term, consideration will be given to other lands.
- Objective SS 02b  
Focus new residential development on appropriately zoned lands within the County, within appropriate locations proximate to existing settlement centre lands where infrastructural capacity is readily available, and they are along an existing or proposed high quality public transport corridors and on appropriate infill sites in the town centres, in a phased manner alongside the delivery of appropriate physical and social infrastructure.

Objective DMS03a

Submit a detailed statement for developments on land zoned residential or mixed use, in excess of 100 residential units outlining:

## PROPOSED VARIATION 2

- Compliance with the sequential approach in relation to development of the area,
  - Potential for sustainable compact growth
  - The scale of employment provision and commuting flows
  - Extent of local services provision i.e. administration, education- particularly third level, health, retail and amenities
  - Transport accessibility
  - Environmental sensitivities, resources and assets and
  - Current and planned infrastructure capacity
2. Section 10 (2A) of the Planning and Development Act requires that a core strategy outlines a settlement hierarchy. It is recommended the text is amended throughout the Variation accordingly.
  3. It is recommended the following statement is included in Section 1.2 of the Development Plan.

Where any objectives of the Development Plan are considered to be materially inconsistent with those of the National Planning Framework, the Regional Spatial and Economic Strategy or the Specific Policy Requirements of Guidelines issued under Section 28 of the Act, the aforementioned documents shall take precedence.

4. The following text will replace page 38 and 39 of the current Development Plan (and page 32-33 of the Variation document):

While Table 2.8 outlines the potential to deliver 43,104 units, it must be interpreted in the County Fingal context, in that the land will become available on a phased basis. The key tenet of the overall Settlement Strategy is the continued promotion of sustainable development through positively encouraging consolidation and densification of the existing urban built form – and thereby maximising efficiencies from already established physical and social infrastructure. This principle of compact growth and regeneration is also a key facet of the NPF and the RSES.

We recognise this level of development is unlikely to be developed over the lifetime of this County Development Plan rather it outlines the optimal sustainable development strategy for the County over a much longer time period and can only be developed in tandem with the timely delivery of the necessary physical and social infrastructure.

As outlined earlier in this Chapter, Appendix 2 of the NPF Implementation Roadmap identifies a population of 333,000 persons in 2026 and 349,000 persons in 2031 for Fingal. These figures are confirmed in Appendix B of the adopted RSES. Any review of the Development Plan will be required to address these figures and a revised Core Strategy will be developed.

## PROPOSED VARIATION 2

This represents a growth of 8.7% across Fingal. Without prejudice to this future, for the purposes of this Variation, it is expected that Fingal will grow for the remaining period of the Development Plan. Having regard to the locations of active sites and planning permissions, it is expected a higher rate of growth will occur in the Metropolitan area, versus the Core area.

This Variation must in the short-term plan for an additional 15,285 housing units. These units shall be located at appropriate locations proximate to existing settlement centre lands where infrastructural capacity is readily available, and they are along an existing or proposed high quality public transport corridor.

There are also areas within the existing footprint of the settlements which will allow for smaller schemes through infill and town centre regeneration.

The identification of the lands at Lissenhall as longer-term development reflects the significant short-medium term physical and social infrastructural constraints associated with the development of this area such as the provision of MetroLink and a LAP.

It is also noted that the housing capacity allocated to Hansfield SDZ could be excluded from the total figures, as per the DoEHLG *Guidance Notes on Core Strategies* issued in November 2010. The DoEHLG state that 'any excess (of lands or housing capacity) will not normally include lands identified for the strategic long term development as part of Strategic Development Zones or major regeneration sites within key areas...'. Notwithstanding this, in order to identify the full potential of zoned lands within the County these figures have been included in Tables 2.6 and 2.8.

The development of the strategic lands at Lissenhall will be subject to a Local Area Plan, SEA and Appropriate Assessment and will also be dependent on the concurrent delivery of adequate water services and upgraded /planned public transport infrastructure.

In relation to the development of other lands within the County, Local Area Plans, the SDZ at Hansfield, and Masterplans, will establish more detailed phasing or prioritisation for the delivery of residential uses, other uses, or infrastructure, as appropriate. Such locally-based plans and related requirements are set out in Chapter 4, Urban Fingal.

5. In Chapter 3 – Placemaking include additional text in the Strategic Development Zones, Local Area Plans and Masterplan Section.

It is Fingal's priority to form effective and innovative approaches to mobilise development land to create housing and quality urban neighbourhoods. Consequently, any development, is positioned against the national, regional and local policies and objectives. Facilitating the provision of the right quantity of appropriate housing in the right locations that is accessible for all residents is crucial for Fingal County Council.

The provision of housing in Fingal must be in line with the National Planning Framework's and the Regional Spatial and Economic Strategy's projected population for the County. As indicated in Chapter 2 of this Development Plan, development will only be permitted on

## PROPOSED VARIATION 2

lands where there is a development framework, such as a Local Area Plan or a Masterplan, in place. This policy, in itself, will naturally result in a phasing of land, i.e. those with a framework will be available for development before those without.

To ensure the development of sustainable communities that are economically, environmentally and socially healthy and resilient, all future Local Area Plans and Masterplans will be required to outline specific phasing arrangements. These policies enable the delivery of quality dwellings and help create and maintain sustainable communities and neighbourhoods. The phasing arrangements should be founded on sequential development from the centre out and an asset based approach. This approach would outline the social, economic and natural assets that are required within a settlement to ensure the proposed growth is sustainable in the longer term. This will ensure that settlements identified for significant population and/ or employment growth are supported by the requisite investment in infrastructure and provision of employment, amenities and services at the right time.

6. It is recommended that Table 2.9 and, consequently Figure 2.3 is edited as per OPR recommendation no. 5 and shown below.

<b>Metropolitan Area</b>	<b>Core Area</b>
<p><b>Dublin City and Suburbs Consolidation Area</b></p> <p>Blanchardstown</p>	
<p><b>Consolidation Areas Within Dublin City and Suburbs</b></p> <p>Baldoyle, Castleknock, Clonsilla, Howth, Baskin, Mulhuddart Village, Portmarnock, Sutton, Santry (Incl. Ballymun) Balgriffin &amp; Belcamp Charlestown &amp; Meakstown</p>	
<p><b>Key Town</b></p> <p>Swords</p>	
<p><b>Self Sustaining Growth Towns</b></p> <p>Donabate Malahide</p>	<p><b>Self Sustaining Towns</b></p> <p>Balbriggan Lusk Rush Skerries</p>

## PROPOSED VARIATION 2

Towns and Villages	Other Core Towns and Villages
Portrane Coolquay Kinsealy Rivermeade Rowlestown	Balrothery Loughshinny Ballyboghil Naul Balcadden Oldtown Garristown
<b>Rural – Clusters and Rural Area</b> See Chapter 5 entitled ‘Rural Fingal’ for a full list of rural clusters	

Figure 2.3



7. It is recommended a further objective is included in Chapter 2 of the Development Plan which states:

### Objective SS1a

Support the implementation of and promote development consistent with the National Strategic Outcome of Compact Growth as outlined in the NPF and the Regional Strategic Outcome of Compact Growth and Regeneration as set out in the RSES.

8. Replace Objective PM42 with the following wording:

Implement the policies and objectives of the Minister in respect of ‘Urban Development and Building Heights Guidelines’ (December, 2018) and ‘Sustainable Urban Housing: Design

Standards for New Apartments' (March, 2018) issued under section 28 of the Planning and Development Act, as amended.

### **Submission: Eastern and Midlands Regional Assembly FIN-C267-13**

#### **Summary of Comments**

##### Settlement Hierarchy:

The RSES identifies 'Dublin city and suburbs', which includes part of Fingal, including Blanchardstown as a city of international scale forming the top tier in the regional Settlement Hierarchy, as set out in Table 4.2 of the RSES. The RSES also identifies a number of Key Towns including Swords, which is located in the wider Dublin Metropolitan Area (DMA), as large economically active towns that have the capacity to act as drivers for growth, forming the third tier in the regional Settlement Hierarchy.

To reflect this, it is considered that the terminology used in the Fingal Settlement Hierarchy should seek to ensure consistency with the RSES Settlement Hierarchy set out in Table 4.2 of the RSES

It is recommended that settlement terms be updated and presented consistently throughout the proposed Variation.

Having regard to the above, to ensure consistency of approach and in the absence of any evidence-based justification for the designation of Malahide as a 'Self-sustaining growth town', it is recommended that the definitions for Malahide be revised to either a 'Consolidation Area within the Metropolitan Area' or as a 'Self-sustaining town'.

##### Compact Growth:

It is recommended that the Core Strategy include reference to the policies set out in the NPF and RSES on the need to ensure compact growth and accelerated delivery of residential sites in the metropolitan area, to achieve a target of 50% of all new homes within or contiguous to the built up area of Dublin City and Suburbs and at least 30% in other settlements.

It is recommended that the Core Strategy should contain more explicit reference to the strategic development areas set out in Table 5.1 of the MASP, which were identified on the basis of their potential to deliver sustainable compact growth, and to ensure consistency in this regard between the MASP and the Fingal CDP.

##### Core Strategy Population Targets:

EMRA welcomes the stated alignment that is required between policies of the NPF and RSES with the Core Strategy of the County Development Plan and the inclusion of Table 6.2 'NPF/RSES Population Targets for the Dublin Region and FCC', in line with Appendix B of the RSES (SPA and County Population Tables).

Fingal County Council's attention is also drawn to the transitional population projections methodology, implications and safeguards in the Implementation Roadmap for the NPF July

## *PROPOSED VARIATION 2*

2018 issued under Circular FPS04/2018, and National Policy Objective (NPO) 68 of the NPF which allows for up to 20% of the phased population growth targeted in Dublin city and suburbs, to be accommodated in the wider metropolitan area i.e. outside the city and suburbs or contiguous zoned area, in addition to growth identified for the Metropolitan area. The RSES limits any population transfer to the Metropolitan Key Towns of Bray, Maynooth and Swords and states that the determination of population targets for the local authorities in the metropolitan area will be agreed in consultation with the MASP Implementation Group, within 6 months of the adoption of the RSES.

Having regard to the above, it is noted that the proposed Variation includes additional transitional population projections as part of an allocation to Swords as a Key Town under NPO 68. In this regard, it is recommended that the figures for 'RSES Adjusted Transitional Population Projections for MASP' be omitted from Table 6.2 of the proposed Variation, and that the Table and accompanying narrative be amended.

### Housing:

Section 2.5 of the proposed Variation sets out revised housing targets for additional units over the remaining lifetime of the CDP. The proposed Variation cites planning permissions granted for c.5,600 units housing units to September 2019 leaving a requirement for c.8,900 units over the remaining lifetime of the plan and states that it considers there is sufficient capacity for further housing growth over the remaining life cycle. The submission notes that planning permissions do not necessarily guarantee delivery and it is anticipated that the upcoming review of the CDP will need to set out and monitor the service capacity and likely delivery on zoned lands, both brownfield and greenfield.

Furthermore, it is recommended that the proposed Variation should include reference to the need to prepare an evidence-based Housing Need Demand Assessment (HNDA), in line with NPO 37 of the NPF.

### Housing Land Capacity:

The proposed Variation updates Table 2.8 'Total Residential Capacity provided under the Fingal Development Plan 2017-2019', to reflect the reduced remaining capacity as of September 2019. While it is stated in the proposed Variation that there is sufficient capacity for further growth in Fingal over the remaining lifetime of the plan, it is also acknowledged that the level of development is unlikely to be developed during this time period.

The attention of the Council is brought in this regard, to Chapter 4 of the RSES, including Settlement Strategy RPO 4.1, and to the methodology for transitional projections in the NPF Roadmap, requiring the council to set out a rationale for the provision of zoned land to meet the required NPF/RSES population targets.

EMRA further consider the paragraph under the heading 'Total Capacity – Fingal Development Plan 2017 – 2023, is not consistent with the RSES and should be amended accordingly.

### Rural settlement strategy:

## PROPOSED VARIATION 2

The inclusion of a rural settlement strategy in the CDP is welcome and it is suggested that proposed Variation would further benefit from inclusion of policy support for the provision of serviced sites in rural villages as an alternative to one-off housing, in line with RPO 4.78 of the RSES.

### Retail:

EMRA notes the RSES does not define lower tier settlements and their retail function and this is should be reflected in the retail chapter.

### Climate Action:

Given the enhanced focus on climate action as one of the three key Principles in the RSES, it is recommended that the proposed Variation should set out additional measures to accelerate climate action and energy transition in the county.

The Councils' attention is drawn to RPO 3.6 and the preceding paragraphs of the RSES which outline the requirement of Development Plans to assess their impact on carbon reduction targets.

### Green Infrastructure

The inclusion in the proposed Variation of narrative which supports the cross-boundary co-ordination of regional Green Infrastructure as well as the recognition given to the importance of landscape character assessment is welcome.

### Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)

The proposed Variation underwent a Screening for Strategic Environmental Assessment (SEA) and the SEA determination concluded that the proposed Variation will not result in any significant adverse environmental effects and therefore it was determined that a SEA is not required. A Screening for Appropriate Assessment (AA) was also carried out and concluded that the proposed Variation will not result in likely significant effects to European sites and therefore does not require an AA or the preparation of a Natura Impact Report (NIR).

### Chief Executive's Response

The Settlement Hierarchy as shown in the Variation was intended to reflect the status of Swords as the County Town of Fingal County Council. However, it is recommended that Table 2.9 and Figure 2.3 is edited as shown below.

Metropolitan Area	Core Area
Dublin City and Suburbs Consolidation Area Blanchardstown	



## PROPOSED VARIATION 2

<b>Consolidation Areas Within Dublin City and Suburbs</b> Baldoyle Castleknock Clonsilla Howth Baskin Mulhuddart Village Portmarnock Sutton Santry (Incl. Ballymun) Balgriffin & Belcamp Charlestown & Meakstown	
<b>Key Town</b> Swords	
<b>Self Sustaining Growth Towns</b> Donabate	<b>Self Sustaining Towns</b> Balbriggan Lusk Rush Skerries
<b>Self Sustaining Towns</b> Malahide	
<b>Towns and Villages</b> Portrane Coolquay Kinsealy Rivermeade Rowlestown	<b>Other Core Towns and Villages</b> Balrothery Loughshinny Ballyboghil Naul Balscadden Oldtown Garristown
<b>Rural – Clusters and Rural Area</b> See Chapter 5 entitled ‘Rural Fingal’ for a full list of rural clusters	

**Figure 2.3**



These objectives of consolidation and compact growth, and utilising brownfield and infill sites continue throughout the Development Plan. However, in response to the recommendation, it is recommended a further objective is included in Chapter 2 of the Development Plan which states:

### Objective SS03a

Support the implementation of and promote development consistent with the National Strategic Outcome of Compact Growth as outlined in the NPF and the Regional Strategic Outcome of Compact Growth and Regeneration as set out in the RSES.

Furthermore, it is recommended the following objectives are edited as follows:

### New Objective SS01b

Consolidate within the existing urban footprint, by ensuring that 50% of all new homes within or contiguous to the built up area of Dublin City and Suburbs and 30% of all new homes are targeted within the existing built-up areas to achieve compact growth of urban settlements, as advocated by the RSES.

### Objective SS03

Identify sufficient lands for residential development in order to achieve the housing and population targets set out in the Core Strategy, **with a focus on urban regeneration and compact growth**, while ensuring that excess lands surplus to this specific requirement are not identified, in order to prevent fragmented development, uneconomic infrastructure provision and car dependent urban sprawl.

## PROPOSED VARIATION 2

It is acknowledged that the MASP implementation group has not yet finalised the reallocation of population to Key Towns, which includes Swords. Accordingly, it is recommended this is removed from Table 6.2 and the text amended to include reference to the future allocation of population to Swords. It is recommended Section 2.5 is edited as per the response to the OPR, on page 8.

Fingal acknowledges that planning permissions does not guarantee housing delivery and it is another statistic that helps outline how development is progressing across the county but should not be taken in isolation. Figures from the Housing Task Force Returns show there is construction across the county being carried out at a stable rate. Furthermore, it is considered, notwithstanding the number of planning permissions which have been granted the upcoming review of the CDP will need to set out further information in relation to growth and projected housing figures and the likely delivery on zoned lands.

Section 7 of the proposed Variation outlines the need for an HNDA to be carried out in line with NPO 37 of the NPF.

### Edit text after table 2.8 to further include:

While Table 2.8 outlines the potential to deliver 43,104 units, it must be interpreted in the County Fingal context, in that the land will become available on a phased basis. The key tenet of the overall Settlement Strategy is the continued promotion of sustainable development through positively encouraging consolidation and densification of the existing urban built form – and thereby maximising efficiencies from already established physical and social infrastructure. This principle of compact growth and regeneration is also a key facet of the NPF and the RSES.

We recognise this level of development is unlikely to be developed over the lifetime of this County Development Plan rather it outlines the optimal sustainable development strategy for the County over a much longer time period and can only be developed in tandem with the timely delivery of the necessary physical and social infrastructure.

As outlined earlier in this Chapter, Appendix 2 of the NPF Implementation Roadmap identifies a population of 333,000 persons in 2026 and 349,000 persons in 2031 for Fingal. These figures are confirmed in Appendix B of the adopted RSES. Any review of the Development Plan will be required to address these figures and a revised Core Strategy will be developed.

This represents a growth of 8.7% across Fingal. Without prejudice to this future, for the purposes of this Variation, it is expected that Fingal will growth for the remaining period of the Development Plan. Having regard to the locations of active sites and planning permissions, it is expected a higher rate of growth will occur in the Metropolitan area, versus the Core area.

This Variation must in the short-term plan for an additional 15,285 housing units. These units shall be located at appropriate locations proximate to existing settlement centre lands where infrastructural capacity is readily available, and they are along an existing or proposed high quality public transport corridor.

## PROPOSED VARIATION 2

There are also areas within the existing footprint of the settlements which will allow for smaller schemes through infill and town centre regeneration.

The identification of the lands at Lissenhall as longer-term development reflects the significant short-medium term physical and social infrastructural constraints associated with the development of this area such as the provision of MetroLink and a LAP.

It is also noted that the housing capacity allocated to Hansfield SDZ could be excluded from the total figures, as per the DoEHLG *Guidance Notes on Core Strategies* issued in November 2010. The DoEHLG state that 'any excess (of lands or housing capacity) will not normally include lands identified for the strategic long term development as part of Strategic Development Zones or major regeneration sites within key areas...'. Notwithstanding this, in order to identify the full potential of zoned lands within the County these figures have been included in Tables 2.6 and 2.8.

The development of the strategic lands at Lissenhall will be subject to a Local Area Plan, SEA and Appropriate Assessment and will also be dependent on the concurrent delivery of adequate water services and upgraded /planned public transport infrastructure.

In relation to the development of other lands within the County, Local Area Plans, the SDZ at Hansfield, and Masterplans, will establish more detailed phasing or prioritisation for the delivery of residential uses, other uses, or infrastructure, as appropriate. Such locally-based plans and related requirements are set out in Chapter 4, Urban Fingal.

The zoning of land in any forthcoming land use plan shall comply with the requirements as detailed in Appendix 3 of the NPF relating to a methodology for a tiered approach to land zoning. This methodology requires that land should not be zoned for development unless there is existing service capacity available (Tier 1) or the lands have the potential to become fully serviceable (Tier 2) during the life of the plan. Future land use plans shall therefore contain a detailed Infrastructural Assessment for residential land that provides for an evidence-based approach to the servicing of potential sites to establish their suitability for zoning. Other planning considerations such as the overall planned levels of growth, location, suitability for the type of development envisaged, availability of and proximity to amenities, schools, shops or employment, accessibility to transport services, etc., shall also be considered. The NPF also requires that land use plans target of 50% of all new homes within or contiguous to the built up area of Dublin City and Suburbs and at least 30% in other settlements. The built-up footprints have been defined by the CSO in the Census of Population

It is recommended the Section 'Total Capacity – Fingal Development Plan, 2017 – 2023, updated' is edited as shown below:

Practice in relation to previous Regional Planning Guidelines (RPGs) and core strategies, has generally been to match future population targets to the physical extent of land being zoned for development, based on assumptions related to density and household occupancy. A further factor of 50% of the identified land requirement has also been universally applied as

'headroom'.

This practise has now been replaced with the headroom now relating to population projection, instead of zoned land. The RSES considers the concept of headroom based solely on zoned land provision and does not account for housing yield arising from the re-use of existing housing stock, mixed-use development, urban intensification or infill or brownfield development. The NPF Roadmap population projections already incorporate 25% headroom figures for all parts of the country (Implementation Roadmap for the National Planning Framework, Appendix 2). In Fingal this may be supplemented by additional 25% headroom, (page 5 of the NPF Roadmap). As noted in the RSES, the application of headroom is particularly relevant to urban areas, where the aim is to target at least half of future housing delivery within existing built-up areas.

~~The reservation of lands at Lissenhall, situated within the Metropolitan Area, continues to account for the majority of this headroom allocation.~~

The Village Settlement Strategy of Chapter 5 of the Fingal Development Plan outlines the support of serviced sites in rural villages and states:

*A particular need within the rural community is for sites where houses are designed to meet the applicant's own requirements. To this end, serviced sites, designated as such in village LAPs within the villages will serve to meet people's needs for house sites on which they can develop individual or 'one-off' houses. These houses will accord with design parameters which will be set out in the Village LAPs and accompanying Village Development Framework Plans.*

Each Rural Village LAP subsequently has identified the appropriate location for serviced sites within each rural village. It is considered this accords with RPO 4.78.

EMRA's notes in relation to Climate Action are acknowledged. However, it is noted that Climate Action Adaption is a cross cutting theme of the current Development Plan and this is already a key focus. The Council recognises that climate change is an over-riding challenge facing us locally arising from the global challenge of climate change. The EU and Ireland has already committed to mitigation policies which are designed to reduce carbon emissions and include regulations on matters such as car efficiency and building regulations. Guidelines, prepared by The Department of Housing, Planning and Local Government (DHPLG), will provide clarification around the development of a suitable methodology for measuring carbon emissions, appropriate to strategic land use designation and related transport infrastructure in the context of the preparation of city/county development plans and it is hoped these will be published prior to the review of the next development plan. in the meantime, there are a number of policies and objectives outlined our measures in relation to climate action, energy transition and carbon reduction, including the following:

*Objective PM01*

*Support the development of sustainable low-carbon climate resilient communities.*

*Objective PM28*

*Improve the efficiency of existing buildings and require energy efficiency and conservation in the design and development of all new buildings within the County.*

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### *Objective PM29*

*Promote energy efficiency and conservation above Building Regulations standards in the design and development of all new buildings and residential schemes in particular and require designers to demonstrate that they have taken maximising energy efficiency and the use of renewable energy into account in their planning application.*

### *Objective PM50*

*Ensure that new dwellings in the rural area are sensitively sited and designed and demonstrate consistency with the immediate Landscape Character Type, and make best use of the natural landscape for a sustainable, carbon efficient and sensitive design.*

### *Objective EN01*

*Support International, National and County initiatives for limiting emissions of greenhouse gases through energy efficiency and the development of renewable energy sources using the natural resources of the County in an environmentally sustainable manner where such development does not have a negative impact on the surrounding environment, landscape or local amenities.*

### *Objective EN02*

*Support and encourage pilot schemes which promote innovative ways to incorporate energy efficiency.*

### *Objective EN03*

*Consider the adaptability of buildings over time and seek to improve the efficiency of existing building stock and promote energy efficiency and conservation in the design and development of all new buildings in the County.*

### *Objective EN04*

*Encourage development proposals that are low carbon, well adapted to the impacts of Climate change and which include energy saving measures and which maximise energy efficiency through siting, layout and design.*

### **Recommendation**

9. It is recommended a further objective is included in Chapter 2 of the Development Plan which states:

#### **Objective SS03a**

Support the implementation of and promote development consistent with the National Strategic Outcome of Compact Growth as outlined in the NPF and the Regional Strategic Outcome of Compact Growth and Regeneration as set out in the RSES.

10. Furthermore, it is recommended the following objectives are edited as follows:

#### **New Objective SS01b**

Consolidate within the existing urban footprint, by ensuring that 50% of all new homes within or contiguous to the built up area of Dublin City and Suburbs and 30% of all new

## PROPOSED VARIATION 2

homes are targeted within the existing built-up areas to achieve compact growth of urban settlements, as advocated by the RSES.

### 11. Objective SS03

Identify sufficient lands for residential development in order to achieve the housing and population targets set out in the Core Strategy, **with a focus on urban regeneration and compact growth**, while ensuring that excess lands surplus to this specific requirement are not identified, in order to prevent fragmented development, uneconomic infrastructure provision and car dependent urban sprawl.

### 12. Include additional text after table 2.8, after final paragraph (i.e. above Section 2.7):

The zoning of land in any forthcoming land use plan shall comply with the requirements as detailed in Appendix 3 of the NPF relating to a methodology for a tiered approach to land zoning. This methodology requires that land should not be zoned for development unless there is existing service capacity available (Tier 1) or the lands have the potential to become fully serviceable (Tier 2) during the life of the plan. Future land use plans shall therefore contain a detailed Infrastructural Assessment for residential land that provides for an evidence-based approach to the servicing of potential sites to establish their suitability for zoning. Other planning considerations such as the overall planned levels of growth, location, suitability for the type of development envisaged, availability of and proximity to amenities, schools, shops or employment, accessibility to transport services, etc., shall also be considered. The NPF also requires that land use plans target of 50% of all new homes within or contiguous to the built up area of Dublin City and Suburbs and at least 30% in other settlements. The built-up footprints have been defined by the CSO in the Census of Population

### 13. Amend Section 6.8:

~~Delete: Additionally, Fingal's Retail Hierarchy is required to accord with the settlement hierarchy identified for the County in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 (RPGs) issued in 2010.~~

### 14. It is recommended the Section 'Total Capacity – Fingal Development Plan, 2017 – 2023, updated' is edited as shown below:

Practice in relation to previous Regional Planning Guidelines (RPGs) and core strategies, has generally been to match future population targets to the physical extent of land being zoned for development, based on assumptions related to density and household occupancy. A further factor of 50% of the identified land requirement has also been universally applied as 'headroom'.

This practise has now been replaced with the headroom now relating to population projection, instead of zoned land. The RSES considers the concept of headroom based solely on zoned land provision and does not account for housing yield arising from the re-use of existing housing stock, mixed-use development, urban intensification or infill or brownfield development. The NPF Roadmap population projections already incorporate 25% headroom figures for all parts of the country (Implementation Roadmap for the National Planning Framework, Appendix 2). In Fingal this may be supplemented by additional 25% headroom,

## *PROPOSED VARIATION 2*

(page 5 of the NPF Roadmap). As noted in the RSES, the application of headroom is particularly relevant to urban areas, where the aim is to target at least half of future housing delivery within existing built-up areas.

~~The reservation of lands at Lissenhall, situated within the Metropolitan Area, continues to account for the majority of this headroom allocation.~~

**Submission: National Transport Authority, FIN-C267-10**

### **Summary of Comments**

Notes the contents of the proposed Variation.

### **Chief Executive's Response**

Contents noted.

### **Recommendation**

No change.



### Other Prescribed Bodies

**Submission: Department of Education and Skills, FIN-C267-24**

#### **Summary of Comments**

The submission notes the contents of the proposed Variation and accepts that population projections will be adjusted to coincide with lifetime of the Plan. The Department of Education and Skills recognise the importance of on-going and future engagements between the Department and Fingal. The Department further highlight the need for regular structured engagement to take place to ensure adequate education provision is available in the appropriate locations to meet the need of the increased population.

#### **Chief Executive's Response**

Noted.

#### **Recommendation**

No change.

**Submission: Irish Water, FIN-C267-5**

#### **Summary of Comments**

Notes no objection to the proposed Variation.

#### **Chief Executive's Response**

Contents noted.

#### **Recommendation**

No change.

**Submission: Health Service Executive, FIN-C267-7**

#### **Summary of Comments**

Notes they have reviewed and are in agreement with the proposed Variation.

#### **Chief Executive's Response**

Contents noted.

#### **Recommendation**

No change.

**Submission: Office of Public Works, FIN-C267-6**

### **Summary of Comments**

The OPW encourage the addition of objectives which demonstrate the intention to progress the goals of the Settlement Strategy in line with the Planning System and Flood Risk Management Guidelines (2009) and associated circulars to ensure any planning or zoning decisions are carried out in line with these guidelines.

### **Chief Executive's Response**

The contents of the submission are noted. A Strategic Flood Risk Assessment (SFRA) was undertaken for the Development Plan having regard to the Ministerial planning guidelines on The Planning System and Flood Risk Management. Flood Risk Assessment was integrated into the SEA process. Furthermore, Objective SW02 states:

*Allow no new development within floodplains other than development which satisfies the justification test, as outlined in the Planning System and Flood Risk Management Guidelines 2009 for Planning Authorities (or any updated guidelines).*

### **Recommendation**

No change.

**Submission: Transport Infrastructure Ireland, FIN-C267-4**

### **Summary of Comments**

The TII have reviewed the proposed Variation and notes the importance of the Trans-European Transport Networks (TEN-T). These are a planned set of transport networks across Europe. The M1 is identified as part of that TEN-T Core Network. Both the NPF and the RSES include policies to improve and protect the EU TEN-T network and the strategic function of the Dublin to Belfast network.

The TII note that it is particularly important that policies and objectives drafted continue to allow the M1 as part of the Dublin Belfast Economic Corridor continues to play its strategic role.

### **Chief Executive's Response**

The Development Plan recognises the importance of the Dublin Belfast Economic Corridor and its strategic role. This is acknowledged as part of the role of Swords in Chapter 4 and again as one of the competitive advantages that the economic strategy for the County seeks to maximise upon. Objectives ED13 and ED14 specifically relate to this:

*Objective ED13*

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*Realise the benefits associated with the Dublin-Belfast Economic Corridor through supporting appropriate forms of development at key locations in accordance with the Fingal Settlement Strategy.*

*Objective ED14*

*Engage and collaborate with adjoining Local Authorities and regional assemblies, as appropriate, to promote the continued economic development of the Dublin–Belfast Economic Corridor.*

### **Recommendation**

No change.

**Submission: Meath County Council, FIN-C267-8**

### **Summary of Comments**

Meath County Council welcome the opportunity to comment on the proposed Variation.

The settlements contiguous to the Meath border such as Clonee, Ashbourne and Stamullen are highlighted as areas where coordination between Fingal and Meath County Council will be important to ensure appropriate growth.

The identification of Swords as a Key Town is acknowledged.

The submission identifies potential for co-operation between the two counties and notes that they have commissioned a transportation study for Dunboyne and Environs which will require cooperation. Further cooperation will be required in relation to any N3 N4 link road and it is requested Objective MT43 is retained.

### **Chief Executive's Response**

Fingal recognises the range of issues outlined in the submission and is committed to working collectively with Meath County Council to achieve continued sustainable and consolidated population and employment growth in the wider eastern regional area with a key focus on improving housing supply, amenity provision and improved public transport and sustainable travel options. It is noted Objective MT43 is not part of this Variation.

### **Recommendation**

No change.

**Submission: Health and Safety Authority, FIN-C267-1**

### **Summary of Comments**

Submission notes their requirements regarding COMAH sites.

### **Chief Executive's Response**

Not relevant to this Variation.

### **Recommendation**

No change.

**Submission: Environmental Protection Agency, FIN-C267-3**

### **Summary of Comments**

This submission includes a copy of EPA submission in relation to the screening of proposed Variation and requests that these be considered, as relevant and where appropriate.

The contents of the proposed Variation are acknowledged and the submission makes note of the current Ministerial Direction for the RSES in place and advises any relevant aspects of this Direction may need to be considered prior to its finalisation.

Advice in relation to SEA Regulations and requirements are also outlined.

### **Chief Executive's Response**

Comments are noted in relation to procedures and guidance. The proposed Variation is not impacted by the Ministerial Direction in relation to the RSES.

### **Recommendation**

No change.

### Submissions from individuals and other agencies and organisations, summarised by theme Themes

#### Overall Approach to the Variation, in the Context of the Development Plan Review

##### Relevant Submissions

FIN-C267-9, FIN-C267-11, FIN-C267-25

##### Summary of Comments

- A number of submissions have raised concerns in relation to the context of the proposed Variation, particularly having regard to the review of the Development Plan, which will begin next year. It is suggested the review of the Development Plan should be brought forward.
- The alignment of the proposed Variation with the policies and objectives of the NPF and the RSES is queried along with how these objectives will be interpreted by Fingal and An Bord Pleanála in the assessment of planning applications. There is concern the proposed Variation does not achieve alignment with the NPF or the RSES.
- Details as to how the Variation incorporates the policies and objectives of the NPF and RSES are not clear.

##### Chief Executive's Response:

In 2018 Project Ireland 2040; National Planning Framework ('NPF') and its supporting Implementation Roadmap for the NPF were published. These documents confirmed that the NPF was adopted as a strategy to replace the National Spatial Strategy (NSS). The RSES came into effect in June 2019.

Section 11(1) of the Planning and Development (Amendment) Act 2018 sets out additional legislative provisions for the initiation of the review of City/County Development Plans. Three options were outlined. Of relevance to this Variation is option no. 3 which outlined:

- III. Rendered consistent with the RSES, either through (a) **a variation of the Development Plan** (our emphasis) or (b) if considered more appropriate, a full review, to commence within a maximum period of 6 months after the making of the relevant RSES.

As the current Development Plan was adopted in March 2017, it was considered a Variation of the Development Plan was most appropriate. This approach is in line with requirements of the Planning and Development Act. The Variation option was also considered most appropriate having regard to the programme of work of the Planning and Strategic Infrastructure Department and given that the full review of the Development Plan will formally commence in March 2021, with the actual background work and baseline information gathering already begun. It was not considered suitable at this time to bring forward the review of the Development Plan.

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Both the National Planning Framework and the Regional Spatial and Economic Strategy advocate the provision of compact growth and infill development. These are key tenets of these documents. Likewise, while the Fingal Development Plan was adopted prior to the publication of these documents, the fundamental aim of the Development Plan is to consolidate the existing settlements. The policies and objectives of the Development Plan were written in the context of best practice at that time. Consequently the first vision statement within the Development Plan states the need for compact development and consolidated growth. The need to consolidate urban areas to provide a vibrant, attractive environment for living and working, facilitating efficient movement by sustainable modes of transport throughout the County is stated throughout the Development Plan. Of note is the Strategic Policy (Chapter 1) which states:

- *Promote and facilitate the long-term consolidation and growth of the County town of Swords as provided for in the Swords Strategic Vision 2035.*
- *Consolidate the growth of the major centres of Blanchardstown and Balbriggan by encouraging infill development and intensification of development within appropriate locations.*
- *Consolidate development and protect the unique identities of the settlements of Howth, Sutton, Baldoyle, Portmarnock, Malahide, Donabate, Lusk, Rush and Skerries.*

Furthermore the Development Plan has also considered the required infrastructure, both physical and social required to allow for the settlements in the County to grow sustainably. This is set out in the objectives and policies contained in Chapter 4 and 5 of the Plan. It is also recommended to include text within Section 1.2 of the Development Plan:

[Where any objectives of the Development Plan are considered to be materially inconsistent with those of the National Planning Framework, the Regional Spatial and Economic Strategy or the Specific Policy Requirements of Guidelines issued under Section 28 of the Act, the aforementioned documents shall take precedence.](#)

This accords with the policies and objectives of the NPF and the RSES and in this regard, Fingal County Council consider the Development Plan aligns with the NPF and the RSES.

Furthermore, it is noted that the upcoming review of the Fingal Development Plan, which will formally commence in March 2021, will allow for further re-assessment of the Plan. It is anticipated that the new Development Plan will be further informed by new national policy in the upcoming draft Departmental Guidelines for Development Plans.

All planning applications whether received by Fingal County Council or An Bord Pleanala are required to follow due process and be assessed against the national, regional and local policies and in line with the proper planning and sustainable development of the area.

### **Recommendation**

Include the following text within Section 1.2 of the Development Plan.

[Where any objectives of the Development Plan are considered to be materially inconsistent with those of the National Planning Framework, the Regional Spatial and Economic Strategy or the Specific Policy Requirements of Guidelines issued under Section 28 of the Act, the aforementioned documents shall take precedence.](#)

### Population Projections, Growth Rates, Assumptions Used and Calculations

#### Relevant Submissions

FIN-C267-9, FIN-C267-11, FIN-C267-12, FIN-C267-16, FIN-C267-17, FIN-C267-18, FIN-C267-21, FIN-C267-25

#### Summary of Comments

- The core strategy in the Development Plan is based on census 2006, the NSS and the RPG's, all of which have been superseded by more recent documents. The proposed Variation does not reflect the major changes within these documents.
- The allocation of people and population growth targets within settlements has not changed and the tables should be amended to show estimated population growth.
- There is no justification of the surplus zoned land or methods to prioritise land.
- There is no uniformity between densities across settlement categories.
- Formula used for calculations of residential capacity should be stated.
- Consideration to changing the projected population figures for each town should be given, having regard to their new positions in the Settlement Hierarchy.
- It is noted the proposed Variation relies on the figures outlined in the NPF and the RSES, however, latest figures from CSO indicated higher levels of population growth. There is concern housing demand and need may be underestimated as a result.
- It is noted the Planning Act requires that development plan objectives are consistent with national and regional development objectives as far as practicable. Therefore, there is flexibility for Fingal to consider more up-to-date figures produced by the CSO. Details in relation to these figures are provided and it appears that population growth for Fingal has potentially been underestimated.
- Concern regarding the average household size is outlined.
- There is concern that allowance has not been made for the undersupply of housing during the recession.
- Requests that applications are treated on their own merits in terms of proper planning and sustainable development in light of residential development being a national priority. This submission advocates moving away from the approach of attaching residential unit capacity associated with individual settlements and requests that Objective SS02 is deleted.
- There is specific concern regarding the settlement strategy in relation to Malahide and Baldoyle. The current approach does not allow for sufficient flexibility. The actual growth rates since the publication of the NPF have not been reviewed. Furthermore, population growth levels in recent years have not been met by housing supply. There is further concern average household sizes are increasing due to a shortfall in new housing provision, known as 'crowding'. Therefore there is a need for 'catch up' housing to meet the pent up demand and this should be incorporated in the proposed Variation.
- The NPF targets a significant proportion of urban development on infill/brownfield sites. The proposed Variation is in conflict with this as it limits the number of units that can be developed in a particular area, rather than supporting densification of urban areas. Individual planning permissions may exhaust the capacity of housing in an area as there

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is an interpretation that there is a limit on the scale of development permitted by a planning authority arising from its core strategy.

- There is an assumption that 'planning units' granted equals 100% house builds/occupation. This is not always the case and it is recommended that there is always an oversupply of extant planning permissions.
- A submission makes a note that the population figures shown in table 6.2 should be edited to include 25% headroom and final CSO figures.
- It is submitted there is a need to retain headroom levels of 50% or more.
- There is an expectation of an increase in housing units for town in the MASP area and a decrease in units in towns in the Core area.

### **Chief Executive's Response**

A number of the submissions received queries or requested clarity in relation to population projections, the capacity of the zoned lands within the Development Plan and the calculations behind these figures.

The current Fingal Development Plan outlines the proposed population growth as quantified in the old Regional Planning Guidelines. The Plan also outlined the amount of undeveloped zoned land and gave an estimation of the amount of housing units that could possibly be accommodated. This figure is based on the annual housecount survey and individual consideration of land parcels.

The proposed Variation seeks to update these figures. To this end, the target population to 2026, from the NPF and the RSES is 333,000. This is an increase of c. 36,786 from 2016. Separately the amount of undeveloped zoned land has also been updated for the purpose of this Variation. This reflects the amount of land which has been developed in the preceding years.

The proposed Variation refers to the CSO figures of 2016, as this is the baseline used both the NPF and the RSES and represents a common starting point for growth calculations. Equally it is acknowledged that using an average household size does not allow for local consideration or other nuances, however it is a recognised way of calculating population and is considered reasonable.

Reference in the proposed Variation is made to the number of units granted permission since the adoption of the Development Plan as a reference point. This is a measurable indicator of growth across the County, however, it is not intended to be taken as an exact quantity of population growth. All the figures referenced in the Development Plan help identify a strategic oversight of the existing and future growth of the County. It is acknowledged in the Development Plan, that land is zoned on a long term basis. Over the last 4 years, an average of 2,170 units have been constructed in Fingal each year which will result in increased population in the relevant area during the next census, i.e. 2,170 units with an average occupancy 2.68 persons will result in a potential increase of population of c. 5,815 people per annum. It must be stressed that population growth is not usually as uniform as that. Birth and death rates and net-migration rates will result in fluctuation. However, what our population targets, the undeveloped land and the land capacity figures



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show is that Fingal is well positioned to facilitate the right quantity of appropriate housing in the right locations.

It is considered the figures and calculations shown in the proposed Variation and this CE Report are robust and when combined with existing and proposed the policies and principles in the Development Plan will enable the delivery of quality dwellings in appropriate locations and help create and maintain sustainable communities and neighbourhoods.

Practice in relation to previous Regional Planning Guidelines (RPGs) and core strategies, has generally been to match future population targets to the physical extent of land being zoned for development, based on assumptions related to density and household occupancy. A further factor of 50% of the identified land requirement has also been universally applied as 'headroom'. This practise has been replaced with the headroom now relating to population projection, instead of zoned land. It is recommended the proposed Variation is edited to acknowledge this change, as per the recommendation from the EMRA submission above.

It is also worth noting the premise of the NPF, the RSES and the Development Plan is for the sustainable growth of all settlements across the County. The policies contained in these documents are not intended to inhibit or prevent growth but ensure it's at the correct density in the right location. Therefore, it is not appropriate to stop any further growth in any settlement, regardless of their location in the core or metropolitan area.

### **Recommendation**

It is recommended the Section 'Total Capacity – Fingal Development Plan, 2017 – 2023, updated' is edited as shown below:

Practice in relation to previous Regional Planning Guidelines (RPGs) and core strategies, has generally been to match future population targets to the physical extent of land being zoned for development, based on assumptions related to density and household occupancy. A further factor of 50% of the identified land requirement has also been universally applied as 'headroom'.

This practise has now been replaced with the headroom now relating to population projection, instead of zoned land. The RSES considers the concept of headroom based solely on zoned land provision and does not account for housing yield arising from the re-use of existing housing stock, mixed-use development, urban intensification or infill or brownfield development. The NPF Roadmap population projections already incorporate 25% headroom figures for all parts of the country (Implementation Roadmap for the National Planning Framework, Appendix 2). In Fingal this may be supplemented by additional 25% headroom, (page 5 of the NPF Roadmap). As noted in the RSES, the application of headroom is particularly relevant to urban areas, where the aim is to target at least half of future housing delivery within existing built-up areas.

~~The reservation of lands at Lissenhall, situated within the Metropolitan Area, continues to account for the majority of this headroom allocation.~~

### **Specific Areas Across the County:**

*A number of submissions have been made in respect of specific areas in the County. They have been submitted by individuals, community organisations and development companies. They are dealt with on an area basis.*

### **Balbriggan**

#### **Relevant Submissions**

FIN-C267-2, FIN-C267-9, FIN-C267-11, FIN-C267-19

#### **Summary of Comments**

- The amount of undeveloped land in Balbriggan and consequently proposed population growth is excessive.
- It is considered that Balbriggan is not appropriate for high-density development and should be designated for 'catch-up investment'.
- There is concern zoned land in Balbriggan will be subject to high-density development which is inappropriate as Balbriggan is "at capacity" at present and the policy of the RSES has not been incorporated into the Development Plan.
- Due to the quantum of undeveloped residential zoned land in Balbriggan, it is suggested a new objective be included in the Development Plan which requires that a social infrastructure audit is carried out in Balbriggan to inform decisions as to what catch up investment in social infrastructure is needed prior to any future residential developments being permitted.
- It is also requested that Balbriggan is identified as a self-sustaining town and not the 'largest self-sustaining town in the Core area', that Objectives ED 86 and 87 are deleted and that 'Our Balbriggan' is referenced in the text of the Development Plan.
- Concern regarding Castlelands Masterplan and catch up investment.
- Additional text should be included in relation to the opening of business parks and industrial complexes near Junction 5 – Balbriggan South.

#### **Chief Executive's Response**

A number of submissions have been received with an emphasis on Balbriggan. In general, these submissions express concern that Balbriggan will expand at an excessive rate and will not have the appropriate physical and social infrastructure required for such population growth.

Balbriggan is designated as a 'self-sustaining town' in the RSES. This is defined as a town with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted 'catch up' investment to become more self-sustaining.

The RSES's recommended policy response for self-sustaining towns is for consolidation coupled with targeted investment, where required, to improve local employment, services and sustainable transport options. The RSES also notes the translation of these policy

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responses into development plans should also consider the scale and location of settlements and accordingly the requisite nature and scale of development appropriate at these locations. In this regard, there should be a graded reduction in residential densities for Self-Sustaining Growth Towns, Self-Sustaining Towns, towns and villages that are commensurate to the existing built environment. This is appropriate and will apply for development frameworks in Balbriggan as with all other identified settlement typologies.

It is not the intention of the RSES or the Development Plan that residential development is withheld in the meantime, rather that it occurs at a sustainable rate. The capacity and target population growth rate outlined in the Variation and this CE report are considered reasonable to ensure development occur in Balbriggan at an appropriate pace.

The land zoned in Balbriggan will accommodate growth for the long term and will not be developed in the remaining three years of the Development Plan. Having regard to the recent construction rates of c. 100 units per annum, it is expected that growth in Balbriggan is appropriate for its designation as a self-sustaining town. The Our Balbriggan Plan provides an opportunity for investment in public realm, town centre improvement and rejuvenation to provide a more vibrant and vital centre to the town, working with stakeholders, increase employment, attraction for investment and promote industrial lands.

Fingal County Council will continue to work with the Department of Education officials for the provision of schools in each area of the County, including Balbriggan.

It is considered Balbriggan will continue to grow at a sustainable rate, in accordance with policy of the RSES and the Development Plan.

Our Balbriggan is referenced in Chapter 2 of the proposed Variation, however it is considered further reference can be incorporated into the Plan, at Chapter 4.

The economic strategy for the Core area (Chapter 6) outlines the fact that Balbriggan is the largest self-sustaining town in this area. This is reflective of its size and function in the County. Objectives ED86 and 87 refer to the economic development of the Core area and Balbriggan. They are considered essential for the economic growth of the area and should not be removed.

In relation to the Masterplan at Castlelands, this proposes:

- The average net residential density across the MP lands shall be between 35 -50 dwelling units per hectare (in accordance with the DOE Guidelines - Sustainable Residential development in urban areas May 2009).
- The MP lands shall provide for 600 – 850 residential units
- The appropriate heights of buildings across the MP lands shall comprise 2 – 4.5 storeys (The 4.5 storey buildings will be limited to appropriate locations).

This is considered appropriate for this location and in line with the RSES, the Development Plan and Guidelines issued under Section 28 of the Act.

It is considered the additional text in relation to Section 6.12 is appropriate and should be included.

### **Recommendation**

15. Include further references to Our Balbriggan in Chapter 4, Section 4.3 Balbriggan, of the Development Plan, as follows:

Balbriggan is **the largest of the Self-Sustaining Towns in the Core Area**. Located c.18 kms north of Swords, with easy access off the M1 Motorway, it is also served by the main Dublin to Belfast rail line and commuter services to Dublin City. It has developed as a major residential town in the north of the County with a young and expanding population which has more than doubled over the past 20 years. The current population is estimated at c.20,000. Major infrastructural projects involving major upgrades to the water supply, foul drainage and roads infrastructure have been carried out throughout the town and its environs. Balbriggan is eFibre broadband enabled with superfast fibre delivering speeds of up to 100Mb.

~~The Urban Improvement Scheme has significantly enhanced the streetscape of the town centre. The Urban Design Framework Plan identified potential development sites within the town centre. Implementation of this Plan is central to the regeneration of the town centre. In addition, the Balbriggan Public Realm Plan – ‘The Heart of Balbriggan’ sponsored by the Heritage Council, and underpinned by a strong public participation framework, seeks to focus on strengthening the social, economic and environmental capital of the town promoting the pivotal role of the town centre area in developing a sustainable community. These initiatives, together with the infrastructural and environmental improvements, will provide the impetus for further development and investment in Balbriggan.~~

Fingal have recently developed and published the ‘Our Balbriggan 2019-23 Rejuvenation Plan’, which is set to transform Balbriggan Main Street and Harbour. Fingal are investing in public realm, town centre improvement and rejuvenation to provide a more vibrant and vital centre to the town, working with stakeholders, increasing employment, attracting investment and promoting industrial lands. Over 4,000 locals took part in a survey to prioritise a list of suggested improvements for the ‘Our Balbriggan’ Plan.

A Balbriggan Leadership Group prepared a menu of different initiatives for the €20million-plus plan. Balbriggan as a community has come together with the group of stakeholders, led by Fingal County Council, to engage in a collaborative and unified way to prioritise the ideas which will best address the socio economic needs of the town. Strong progress is being made across the first “20 Things in the first 12 Months” listed in the Our Balbriggan Rejuvenation Plan, including supporting successful community engagements on the development of the Bremeare Regional & Amenities Park, Balbriggan to Skerries section of the Fingal Coastalway and Harry Reynolds Cycling & Pedestrian routes.

Implementation groups have met and are progressing work across the plans four pillars: Local Economy, Public Realm, Education, Training & Employment & Community Affairs & Integration.

The availability of zoned lands for high technology and general industrial development, together with the significant infrastructural and environmental improvements with easy

## PROPOSED VARIATION 2

access to major transport corridors, ports, rail and air networks, offer considerable potential for the town. Fingal County Council is committed to working with representative stakeholders such as the IDA, Enterprise Ireland and the local Chamber of Commerce, to attract and facilitate new employment generators into the town. Balbriggan Chamber of Commerce is an important intermediary to helping local business grow through a range of on-going initiatives to boost the local economy.

Balbriggan Creative Quarter, located around the railway station, is a community of design-focused small businesses, sole traders and start-ups where the aim is to cultivate an open, professional atmosphere for creative development opportunities. Balbriggan BEAT Centre located at Stephenstown offers a range of services to start-ups and developing businesses and encourages business development by way of mentoring and training.

Balbriggan has considerable tourism potential in terms of its natural and built heritage and amenities, particularly given its coastal location with its attractive sandy beach and harbour. Balbriggan Historic Town Core is a designated Architectural Conservation Area.

With continued inward investment, [through the Our Balbriggan Plan](#), Balbriggan has the potential to develop as a dynamic sustainable community in which to live, work, visit and invest.

16. Include additional text at Section 6.12 as follows:

The **Core area** comprises the northern part of the County, and the majority of Fingal's rural areas. The largest town in the Area is Balbriggan, designated as a **Self-Sustaining Town and is the largest of the Self-Sustaining Towns in the Core Area**. Balbriggan functions as the primary town for service and employment delivery for an established catchment, including a wide rural area in the north of the County. There are a number of existing business and industrial parks in the Balbriggan area including Balbriggan Business Campus, Fingal Bay, KVS, and M1 Business Parks, Balbriggan and Stephenstown Industrial Parks. The Beat Enterprise and Development Centre (BEAT) is an incubator centre for new business ventures and provides a range of services to start ups and developing business

[The opening of Business Parks and industrial complexes near Junctions 5 \(Balbriggan South\) and 6 \(Balbriggan\) together with the benefits accruing from the M1 motorway, will increase the attractiveness of Balbriggan to businesses that require easy access to Dublin airport and the IFSC in Dublin city. The readily available workforce, together with the power, natural gas, and fibre-optic resources can be used to attract large-scale employers to the area.](#)

### **Baldoyle/Sutton**

#### **Relevant Submissions**

FIN-C267-18

#### **Summary of Comments**

- There is specific concern regarding the settlement strategy in relation to Baldoyle. The current approach does not provide for sufficient flexibility. Baldoyle and Sutton are in

## *PROPOSED VARIATION 2*

the MASP area and many more apartments should be required to house the population over housing. The core strategy figures for this area appear to apply a density of 50 units per hectare. In this area, adjacent to a train station, higher densities are required.

### **Chief Executive's Response**

The merits of the submission are acknowledged and in this regard the Plan and this Variation are committed to adoption of a settlement strategy that is flexible and responsive to local needs and circumstances, housing delivery and compact urban growth. Chapter 3 and 12 also provides policy to support the development of sustainable communities with a mix of house types, including more apartment developments. It is acknowledged that Dublin City and Suburbs locations such as Baldoyle, adjacent to the DART line and delivering on housing development may be appropriate for higher density developments, which would be assessed on an application by application basis, against all the policies and objectives of the Development Plan.

### **Recommendation**

No change.

### **Barnhill**

#### **Relevant Submissions**

FIN-C267-17, FIN-C267-22, FIN-C267-23

#### **Summary of Comments**

- The Clonsilla Pace Railway Line with the Maynooth Line and associated stations are key infrastructure in Fingal. This area of Fingal has existing infrastructure and has the ability to deliver new communities without the need to wait for funding and development of infrastructure. It is requested the text of the proposed Variation is amended to make specific reference to Barnhill in two places.
- The submissions note planning authorities are required to coordinate and consider the effects of development plan objectives on adjoining local authority areas and joint plans with Meath County Council and South Dublin County Council should be considered for the boundary areas.
- It is requested that land is rezoned as part of the proposed Variation. The lands in question are located to the east of the Barnhill Road, and are bounded to the north by the Navan to Dublin Railway Line and to the South by Clonee Road. The land is currently zoned GB- Greenbelt – a map in relation to the lands is provided. On the basis of housing task force returns and time lags in relation to housing delivery, the quantum of zoned land in the County is not sufficient to accommodate RSES population projections. The zoning of sites like that in Barnhill should be considered as a way of meeting housing needs. The MASP and the RSES recognise the northwest corridor strategic development area as having a role to play in delivering residential development. The land in question is c. 600m from the Hansfield Station. It is submitted the rezoning of this land would be in compliance with the Fingal Development Plan, the NPF and the RSES.

### **Chief Executive's Response**

The investment and infrastructure at Barnhill and along the Clonsilla Pace Railway Line with the Maynooth Line and associated stations is recognised and the wider Dublin 15 area is earmarked for significant growth in the future. Barnhill has been considered as part of the wider Blanchardstown and Dublin 15 area and it is not necessary to specifically refer to it in the text, as requested.

Fingal recognise the need for coordination of approach with adjoining local authorities and works collectively with adjoining local authorities to achieve cooperation and agreement for development in the wider eastern regional area and as part of the Metropolitan Area Strategic Plan (MASP) Implementation Group.

In relation to the specific rezoning request, it is considered there is adequate remaining zoned residential capacity. It is clearly outlined earlier in this report, and in the core strategy that Fingal has a significant and sufficient quantum of zoned land to meet the RSES targets for the Development Plan period. There is therefore no requirement to zone this GB zoned land to 'RS'. The lands are located outside of the development boundary of Blanchardstown and adjacent to undeveloped zoned land. As such allowing the zoning of these lands to residential would not be sequentially appropriate with respect to the sustainable development of the area. This rezoning would also incur a significant loss of GB lands which currently form part of the Strategic Greenbelt. Objective SS08 seeks to 'Strengthen greenbelt lands by identifying opportunities for infill development and consolidation of existing towns to reduce the need to zone additional greenfield lands and ensure the preservation of strategic greenbelts between out towns and villages.' Development of this site would represent encroachment and incremental erosion into the Greenbelt.

### **Recommendation**

No change.

### **Donabate**

#### **Relevant Submissions**

FIN-C267-14, FIN-C267-21

#### **Summary of Comments**

- The recognition of the strategic role of towns along public transport corridors, such as Donabate is welcomed.
- Donabate's position in the settlement hierarchy is welcomed, as its designation as a self-sustaining growth town. However, there are concerns regarding capacity constraints in the Irish Water network.
- It is noted the RSES refers to infrastructural requirements for Donabate and it is recommended the text of the Variation is edited to include these references, – the specific wording is provided.

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- The NPF and RSES include policies and objectives to facilitate compact and sustainable development within existing urban areas and the RSES seeks to accommodate higher density development within the MASP area. It is recommended the text of the Variation is edited to include these references, – the specific wording is provided with reference to Donabate.

### **Chief Executive’s Response**

The submissions in relation to Donabate are welcomed. Development in Donabate is framed by the policies and objectives of the Development Plan and the Donabate Local Area Plan. Donabate has been designated in the RSES as a ‘self-sustaining growth’ town and part of the North – South Strategic Development Corridor.

The concerns regarding infrastructure capacity are acknowledged and the Council will continue to work closely with Irish Water to inform and influence the timely provision of infrastructure within the County in line with Fingal’s Settlement Hierarchy.

It is considered the policies and objectives of the NPF and the RSES in relation to compact growth and density of development are already embedded in the Development Plan and Donabate LAP and will be further emphasised by this Variation and Report. Further text changes specifically relating to Donabate are not required.

### **Recommendation**

No change.

### **Howth**

#### **Relevant Submissions**

FIN-C267-12, FIN-C267-15, FIN-C267-16

#### **Summary of Comments**

- Howth is located in the MASP area. It is considered the new population targets for Fingal have been applied very conservatively and there is no provision for additional growth in Howth. It is considered there is no attempt to translate the policy into additional density and growth in the metropolitan area.
- The delivery of housing continues to be a fundamental priority of government. Active land management is critical for the delivery of housing. However, there has been no changes to the amount of land available for development in Howth over the previous two development plans.
- It is requested that proposed Variation No. 2 be amended to provide for an additional allocation of residential units within Howth, that the Core Strategy be updated to promote higher densities in appropriate locations, including Howth, reflecting the need for a greater mix of housing typologies that may comprise a mix of houses and apartments. The Core Strategy should be amended to provide a greater focus on



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prioritisation measures and active land management, to take account of the capacity of some lands to deliver the additional housing output.

- It is recommended that Table 2.8 is amended to allow a greater density of development in Howth to facilitate more appropriate densities and a greater housing mix.
- Densities proposed for Howth are not reflective of its location adjacent to a DART station where higher densities are recommended. This is an unsustainable use of zoned, serviced land and does not accord with National Policy.
- Densities proposed for Howth in the Core Strategy are at c.30 units per ha. This is an unsustainable use of zoned, serviced land and does not accord with National Policy and recent SHD planning applications current being assessed by ABP whose densities range from 114 – 191 units per hectare.
- The capacity of zoned lands located in Howth should be revised upwards to meet the additional housing output targets set out in Rebuilding Ireland (2016), as well as the increased population projections outlined in the NPF and RSES.
- A particular site is highlighted as meeting the criteria of Intermediate Urban Location established in the Design Standards for New Apartments(2018). The Guidelines advise that such locations are generally suitable for higher density development that may wholly comprise apartments. It is their view that Howth meets the criteria of the Development Plan as an appropriate location for the promotion of higher densities.
- It is also noted that the primary housing stock in the Howth ED is houses/bungalows with just 12.5% apartments/flats.
- The NPF requires nationally that 40% of new homes are building within the existing footprint of settlements and seeks to address this through infill developments and/or increased building heights.
- Lands in Howth are currently going through the SHD process.
- One submission relates specifically to the core strategy in relation to Howth where the submitter has 2 SHD's submitted to ABP. It is noted as part of the SHD Planning Application process, it was necessary to submit a Material Contravention Statement with both planning applications in relation to the Core Strategy (copies of Material Contravention Statements have been submitted).
- Potentially any SHD in Howth could take up its entire housing allocation. The Bord may grant permissions which materially contravene the development plan, while Fingal may not.
- There is a lack of residential zoned land in Howth and one submitter's landholding includes 15 hectares of land which are requested to be zoned residential and this is requested.

### **Chief Executive's Response**

The submissions received in relation to Howth are from developers in the area.

The proposed Variation does not propose any additional zonings across the County, including Howth. The revised Table 2.8 updates the undeveloped zoned land since the Development Plan was adopted.

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Howth's location in the MASP area and adjacent to high quality public transport corridor is acknowledged. This proposed Variation and the recommendations of this CE report embrace the strategic approach advocated by the RSES and the NPF in relation to compact growth of urban settlements and a focus on efficient use of serviced land and delivery of appropriate densities within a compact urban form. It is considered that there is a sufficient quantum of land zoned for residential purposes in and adjacent to Howth to cater for the plan period and beyond. The quantum and location of zoned land reflects the availability of existing services, planned investment, sequential development and environmental requirements, including the restrictions placed on development within the SAAO and SAAO Buffer area which impacts on densification and compact growth in certain parts of the peninsula.

The potential for SHD's to materially contravene the development plan is set out statutorily under the Planning and Development (Housing) and Residential Tenancies Act 2016.

We also acknowledge the potential of the SHDs to materially contravene the development plan.

It is considered that there is an adequate amount of residentially zoned land in the County and within the Howth area along with an appropriate level of growth provided for.. The rezoning of HA lands is not appropriate as such a change in designation would result in the erosion of the high amenity value of these lands. The HA lands in the Howth area are some of the most sensitive in the County and the loss of same would contribute to a significant diminution of the area's landscape value.

### **Recommendation**

No change.

### **Malahide**

#### **Relevant Submissions**

FIN-C267-18

#### **Summary of Comments**

- There is specific concern regarding the settlement strategy in relation to Malahide. The current approach does not allow for sufficient flexibility. The actual growth rates since the publication of the NPF have not been reviewed. Furthermore, population growth levels in recent years have not been met by housing supply. There is further concern average household sizes are increasing due to a shortfall in new housing provision, known as 'crowding'. Therefore, there is a need for 'catch up' housing to meet the pent up demand and this should be incorporated in the proposed Variation.
- In relation to Malahide, these lands are inside the MASP area. Average apartment occupancy rates are much lower than average household sizes and more apartment units will be required. In the case of Malahide many more apartments would be required to house the same population than housing. In this area, adjacent to a train station, high densities are required.

### **Chief Executive's Response**

The merits of the submission are acknowledged and in this regard the Plan and this Variation are committed to adoption of a settlement strategy that is flexible and responsive to local needs and circumstances and will meet housing demand.

Chapter 3 and 12 also provides policy to support the development of sustainable communities with a mix of house types, including more apartment developments.

It is acknowledged that some locations within Malahide, adjacent to the DART line may be appropriate for higher density developments, which would be assessed on an application by application basis, against all the policies and objectives of the Development Plan.

### **Recommendation**

No change.

### **Swords**

#### **Relevant Submissions**

FIN-C267-21

#### **Summary of Comments**

- The prioritisation of Swords is welcomed and the recognition of the strategic role of towns along public transport corridors, such as Donabate is also welcomed.
- With specific reference to Swords, it is noted there are reservations about the calculation of population growth and it is requested there is sufficient allocation to accommodate housing need in the area. It is also requested that required infrastructure is in place for support the development of Swords. Reference is made to road junctions and wastewater capacity.
- Clarity is requested in relation to the figures on the revised Table 2.8.

### **Chief Executive's Response**

Swords is designated as a Key Town in the RSES. These key towns are considered to have the capacity to deliver sustainable compact growth and employment for their catchments in tandem with enabling public transport, infrastructure and services. It is acknowledged that Swords has performed in the delivery of housing within Fingal over the course of the Development Plan to date, supported by LIHAF funding.

National Policy Objective (NPO) 68 of the NPF which allows for up to 20% of the phased population growth targeted in Dublin city and suburbs, to be accommodated in the wider metropolitan area. The RSES states that this transfer will be to the Key Towns, including Swords, as a reflection of the future delivery of Metrolink and associated compact urban growth centred around high quality public transport. While the determination of this

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transfer has yet to be finalised, it is considered Swords will receive a net increase in RSES population target for 2031 (high). This additional growth allocated to Swords will support the regeneration of underused town centre lands along with the planned and sequential infill opportunities to provide for high density and people intensive uses and will ensure Swords continues to develop as a key location for airport related economic development and employment provision. The percentage increase in population provided for in the proposed Variation up to 2023 is sufficient to ensure ongoing delivery of development within the development boundary of Swords.

Furthermore, the agreed Masterplans and LAP's for lands within Swords provide a development framework and phasing arrangements which will ensure delivery of required social and physical infrastructure in the area in an appropriate way. Additionally, Fingal is undertaking the development of a strategy to deliver on public realm improvements, sustainable transport provision, regeneration and redevelopment of the existing town centre and the provision of a civic and public centre as part of the Swords Cultural Quarter and Sustainable Swords Strategy. Fingal will continue to work with infrastructure providers to inform and influence the timely provision of infrastructure within the County in line with Fingal's Settlement Hierarchy.

The revised Table 2.8 updates the undeveloped zoned land since the Development Plan was adopted.

### **Recommendation**

No change.

### **Other**

### **Relevant Submissions**

FIN-C267-9, FIN-C267-11, FIN-C267-16, FIN-C267-20

### **Summary of Comments**

- The proposed Variation does not distinguish between greenfield and brownfield development.
- The current Development Plan is greenfield development led and this has not changed.
- Conflicting information on pages 27 and 32.
- There is concern the housing supply numbers have fallen, despite increases in population.
- There is an expectation from the public and from public representatives that the Development Plan will have correct figures in relation to expected housing predictions.
- Specifically relates to development management standards:
  - The NPF and RSES have key principles in relation to compact growth of urban settlements and have a focus on efficient use of serviced land and delivery of appropriate densities within a compact urban form.

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- It is requested that Fingal consider more innovative ways of developing high quality housing and it is suggested a performance criterion is included in the development plan to facilitate innovative design and includes consideration of residential amenity, private and public amenity space, management of shared spaces, removal of cars of the streets, cycle parking and bin storage.
- The submissions seeks to include specific text (provided) to this effect within the Main Aims of the Development Plan (chapter 1) and Chapter 12 relating particular development management standards.

### **Chief Executive's Response**

The Development Plan, the proposed Variation and this CE report all acknowledge the importance of infill and brownfield development and the difference between brownfield and greenfield development. The following existing objectives of the Development Plan highlight this:

#### *Objective SS01*

*Consolidate the vast majority of the County's future growth into the strong and dynamic urban centres of the Metropolitan Area while directing development in the hinterland to towns and villages, as advocated by national and regional planning guidance.*

#### *Objective SS03*

*Identify sufficient lands for residential development in order to achieve the housing and population targets set out in the Core Strategy, while ensuring that excess lands surplus to this specific requirement are not identified, in order to prevent fragmented development, uneconomic infrastructure provision and car dependent urban sprawl.*

#### *Objective SS08*

*Strengthen greenbelt lands by identifying opportunities for infill development and consolidation of existing towns to reduce the need to zone additional greenfield lands and ensure the preservation of strategic greenbelts between our towns and villages.*

#### *Objective SS15*

*Strengthen and consolidate existing urban areas adjoining Dublin City through infill and appropriate brownfield redevelopment in order to maximise the efficient use of existing infrastructure and services.*

These objectives of consolidation and compact growth, and utilising brownfield and infill sites continue throughout the Development Plan.

The table on page 27 of the proposed Variation relates to the land zoned at the beginning of the Development Plan, i.e. 2017, while the Table on page 32 shows the situation at the end of 2019 with land developed deducted.

Housing Task Force returns to the Department of Housing, Planning and Local Government show a steady supply of housing since the adoption of the development plan. The number of units completed and occupied since 2016 and the number of units under construction are shown below, as per the HTF return:

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Year	Units Completed and Occupied	Under Construction
2016	1026	1767
2017	1378	2200
2018	1830	2527
2019	1805	2192

The Development Plan seeks to provide a degree of certainty in relation to permitted developments for both developer and residents. However, each application is assessed on its own merits. The potential for SHDs to materially contravene the development plan is set out in planning legislation and is acknowledged.

In relation to Development Management Standards, it is considered the existing standards are sufficiently flexible to allow for innovative design solutions

### **Recommendation**

No change.

### Summary of Recommendations

This proposed Variation No. 2 to the Fingal Development Plan 2017-23 seeks to respond to the recent changes in National and Regional planning policy, namely the publication of the National Planning Framework (NPF) in 2018 and the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES) in 2019. The recommendations arising from this Chief Executive’s Report are outlined below:

#### 1. New Section 2.5 Housing and Population Targets

The RSES translates the national and regional population targets set by the NPF to county level. Development Plans are required to be consistent with these targets. The approach in the core strategies is to realise these population targets which will be informed by the transitional population projections methodology set out in the NPF Roadmap, Appendix 2, and a robust evidence based analysis of demand, past delivery and potential.

As part of the approach of achieving consistency with targets of the RSES and the NPF, this core strategy seeks to achieve compliance with national and regional policy, will provide a policy framework for the concentration of development, co-ordinate infrastructural investment and facilitate the population growth outlined in the RSES and shown below.

Fingal County Council	CENSUS 2016	2026 Range		2031 Range	
		Low	High	Low	High
Dublin NPF Road Map	1,347,500	1,489,000	1,517,500	1,549,500	1,590,000
RSES Fingal Allocation	296,000	327,000	333,000	340,000	349,000
<del>RSES Adjusted Transitional Population Projections for MASP</del>		<del>327,000</del>	<del>333,000</del>	<del>340,000</del>	<del>349,000</del>
<i>Source: NPF/RSES and CSO Census</i>					

Table 6.2 above provides details of the population figures for the Dublin Region, extracted from the NPF Implementation Roadmap alongside figures for Fingal County Council, extracted from Appendix B of the RSES, Strategic Planning Area (SPA) and County Population Tables.

The NPF indicates that the average household size in 2016 of 2.75 persons per household is expected to decline to 2.5 persons by 2040 resulting in an average household size decline of 0.01. persons per year over the 24-year period up to 2040.

The population of the County in 2016 was 296,214 persons with a housing stock of 104,851 units (from CSO).

The 2026 high range population target of 333,000 persons provides for a population growth per annum of 3,679<sup>9</sup> persons per year. Extrapolating this figure to the year 2023

<sup>9</sup> This has been revised from the Variation document, due to a calculation error.

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provides for a population projection of 321,964 persons<sup>10</sup>. Dividing this figure by the projected household size in 2023 which is 2.68 persons<sup>11</sup> provides for an overall housing unit requirement of 120,136 units or a growth of 15,285<sup>12</sup> units to the end of the Fingal Development Plan in 2023.

To date (September 2019), approximately 5,582 units have been granted planning permission in the Fingal area, which leaves a requirement of 8,919 over the remaining lifecycle of the Development Plan. It is considered this is sufficient capacity for further growth in Fingal during this time period.

Since the adoption of the Development Plan in early 2017, activity in the housing sector in Fingal has been growing in a positive manner and currently there are eighty-four active sites which have delivered 4,950 units so far with another 2,400 currently under construction. In 2019, 14 sites were fully completed having delivered 1,290 units.

The bulk of this construction activity is taking place in the 'Dublin City and Suburbs', and 'Metropolitan' area and is in areas with a framework for growth. Fingal has employed a number of policy responses to facilitate housing development, namely the adoption of Local Area Plans and Masterplans across the County. Hansfield Strategic Development Zone (SDZ) in Dublin 15 continues to work as a successful policy tool with approx. 1,000 units occupied to date on the overall SDZ lands since the inception of the scheme.

The LAP's and Masterplans provide a framework for development of larger zoned sites. These set out where Fingal's priorities for growth are and provide a development framework and phasing arrangements which will ensure the delivery of the required social and physical infrastructure in an appropriate manner. In addition, the preparation of these Plans has involved significant local consultation and the engagement of Elected Members, and give a degree of certainty to those involved in the development of their areas.

This policy response is shown to be successful to date. The main areas of construction activity, i.e. Hansfield, Blanchardstown, Swords, Baldoyle, Portmarnock, Donabate and Santry and are the areas with the Strategic Development Zone, Local Area Plans and Masterplans and also where construction and SHD activity is taking place. This clearly shows how the development of Fingal is in line with the National and Regional policy regarding consolidation of development within Dublin City and Suburbs, and within the development boundary of existing towns and urban areas and along public transport corridors.

While the particular LAP's and Masterplans include phasing arrangements which ensure the rate of growth is aligned with the provision of social and physical infrastructure and the growth targets of the RSES, the provision of such plans, in itself, will naturally result in a phasing of land, i.e. those with a framework will be available for development before those without. The snapshot below shows how the phasing arrangement has been approached in relation to the Swords Masterplans:

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<sup>10</sup>  $3,3679 \text{ (growth per annum)} \times 7 \text{ (7 years to 2023)} = 25,750 + 296,214 \text{ (current pop)}$

<sup>11</sup>  $2.75 \text{ persons per household in 2016} - 0.01 \text{ persons per year (by 7 years to 2023)}$

<sup>12</sup>  $120,136 \text{ (projected units)} - 104,851 \text{ (unit in Census 2016)} = 15,285$



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Swords is the administrative capital of Fingal. It benefits from direct links to the national road network (M1 and M50) and is located on the Dublin/Belfast economic corridor. Swords is also located within easy travel distance to the key gateways of Dublin Port, via Dublin Port Tunnel, and Dublin Airport, two of the most important economic gateways in the Country. The announcement of the indicative route for the new MetroLink project, which will provide the first direct rail link between Swords, the airport and the City Centre, means that Swords will be extremely well connected to Dublin City's economic and commercial life.

In order to capitalise on this investment in infrastructure, Fingal County Council have prepared Masterplans for Barrysparks & Crowscastle, Fosterstown, and Estuary West. The Masterplans, agreed in May 2019, have been prepared concurrently to ensure a coordinated approach to maximising infrastructural investment. The quantum and form of development in each area is designed to complement that of the other sites and to build on Swords' existing assets.



These Masterplans will provide a significant amount of development. Key to this is phasing. Each Masterplan has its own phasing arrangement which forms a key part of the Plan, Fosterstown is shown below.



Accompanying the Masterplan is a Phasing Schedule. This is required in order to manage the impact of development on the surrounding area and in particular on existing transport infrastructure throughout Swords. The phasing schedule also seeks to provide community infrastructure, such as schools and open space, in the earlier phases of development in order to create a high-quality living and working environment. Table 9.1 sets out the infrastructure required to both create a high-quality living/ working environment and to manage development on the surrounding area.

The table is broken down into both essential and non-essential infrastructure. Essential infrastructure must occur within the phase of development where it is listed before subsequent phases can be constructed and occupied. Non-essential infrastructure lists infrastructure that is anticipated to occur in Swords in the same timeframes but will not hold back future phases of development of the Masterplan should it fail to materialise.

Housing Task Force returns to the Department of Housing, Planning and Local Government show a steady supply of housing since the adoption of the development plan. The number of units completed and occupied since 2016 and the number of units under construction are shown below, as per the HTF return:

Year	Units Completed and Occupied	Under Construction
2016	1026	1767
2017	1378	2200
2018	1830	2527
2019	1805	2192

Over the last 4 years, an average of 2,170 units have been constructed in Fingal each year in locations such as Blanchardstown, Swords, Santry/Northwood, Finglas, Portmarnock, Malahide, Baldoyle, Donabate and Balbriggan. Housing delivery within the metropolitan area and to some extent towns in the core area indicate that Fingal is well positioned to facilitate the right quantity of appropriate housing in the right locations.

The NPF Roadmap population projections already incorporate 25% headroom figures for all parts of the country (Implementation Roadmap for the National Planning Framework, Appendix 2). In Fingal this may be supplemented by additional 25% headroom, (page 5 of the NPF Roadmap). As noted in the RSES, the application of headroom is particularly relevant to urban areas, where the aim is to target at least half of future housing delivery within existing built-up areas.

NPO 68 sets out that up to 20% of the targeted growth for CSO Environs of Dublin city and suburbs should be accommodated in the wider metropolitan area. The RSES states that population transfer as set out in NPO 68 by way of up to 20% of the targeted growth in the city being transferred to other settlements in the MASP shall apply only to the three

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Metropolitan Key Towns in the MASP namely Bray, Maynooth and Swords, and only if they can demonstrate compact growth on high capacity planned or existing public transport corridors. This may result in additional growth for Swords, when agreed by the MASP Implementation Group and may require an amendment in the review of the development plan to be consistent with any figure agreed by the MASP Implementation Group or the Minister in default.

The NPF Implementation Roadmap Circular FPS04/2018 from the Department of Housing Planning and Local Government (DHPLG) states that these 'adjusted' transitional figures will apply to 2026 and will also inform the period to 2031. The adjusted population projections within the MASP will therefore align with the existing timeline of the RSES population targets to 2031

This additional NPO68 related growth, when allocated to Swords, will support the regeneration of underused town centre lands along with the planned and sequential infill opportunities to provide for high density and people intensive uses and will ensure Swords continues to develop as a key location for airport related economic development and employment provision.

It is Fingal's priority, and has been for a period of time, to form effective and innovative approaches to mobilise development to create housing and quality urban neighbourhoods. Consequently, any development undertaken in the County is positioned against the national, regional and local policies and objectives. Therefore, Rebuilding Ireland, the National Planning Framework, the Regional Spatial and Economic Strategy, Fingal Development Plan, LIHAF, the Serviced Sites Fund and other such policies and programmes set the context for future development. These enabling policies are now in place and are facilitating in the delivery of housing across Fingal.

That said, as the economy continues to improve, it is anticipated there will be further demand for housing. It is therefore essential that there is an adequate supply of suitable housing of various types available to facilitate the growth in the economy and to ensure that the output of housing is maintained at a sustainable level that meets the needs of a growing population.

Having regard to the history of housing delivery in Fingal in locations either within Dublin City and Suburbs, within Swords Key Town and proximate to high quality public transport in the metropolitan area, and to a lesser extent in similar well served locations within the Core area, Fingal County Council aims to continue to manage sustainable growth in the settlement typologies within the County.

### **Metropolitan Area**

#### **Dublin City and Suburbs**

##### *Blanchardstown*

The town has a large commercial centre, with a number of distinctive residential areas. Served by the Dublin Maynooth and Dunboyne Railway lines, with expected DART services in the medium term. Development land proximate to railway stations will provide planned development through existing or proposed LAPs and through use of active lands

management. Objectives Blanchardstown 1- 17 within the Development Plan reflect the status of the town and drive consolidation, densification public realm improvement. Having regard to the status of Blanchardstown and the level of delivery of housing so far, the level of development permitted and capable of being accommodated, a 15% increase in population is appropriate.

### *Portmarnock*

Lands proximate to the DART station are delivering housing within an LAP framework. The lands are served by much improved cycling infrastructure and access to high quality parkland and coastal amenity. Ongoing housing construction and delivery through LAP phasing is taking place. 9% population growth to 2023 is appropriate.

### *Baldoyle/Sutton*

Part of the Dublin City and Suburbs settlement, this part of Fingal is served by the DART. At Stapolin, development is being delivered through the LAP, with a station in situ. The village centre is being delivered along with regional parkland. Having regard to the ongoing delivery of housing and phasing, it is considered that 8% population growth is appropriate.

### *Howth*

Howth is afforded a high degree of protection as a consequence of its SAAO and European Site designations. It is served by a DART station and is within the Dublin City and Suburbs area. Benefiting from a village of significant character, brownfield and consolidation lands are available for development proximate to the DART station. A 7% population growth is appropriate.

### *Santry/Northwood/Finglas*

This development area has been providing ongoing housing development in tandem with employment on an ongoing basis. Having regard to the future servicing of the land by the Northwood Metrolink Station and Busconnects and proximity to employment at Ballymun, Charlesland, and Dublin Airport, it is considered that 8% population growth will ensure ongoing housing provision.

### **Key Town**

#### *Swords*

Swords currently provides for a significant employment base, reflecting its location proximate to the M1, M50 and Dublin Airport. The Development Strategy for the town is of consolidation, active land management, employment generation and residential development centred around regeneration of the town centre and high-quality public transport in the form of Metrolink and Busconnects. Development will be appropriately managed through the provision of LAPs and Masterplans. Having regard to the status of the Key Town designation and the ongoing delivery of housing within Swords, a 15% increase in population is appropriate.

### **Self Sustaining Growth Town**

#### *Donabate*

Development in Donabate is set against the policies and objectives of the Fingal Development Plan 2017 – 2023 and the Donabate Local Area Plan 2016 – 2022. Together

these documents identify the strategic spatial planning issues and the vision for structured development and balanced growth for Donabate. The area is identified in the RSES as a 'self-sustaining growth' town and part of the North – South Strategic Development Corridor. The development strategy is to promote the creation of a vibrant town core by providing a high-quality living environment for the existing and future population and providing for the development of the necessary community, commercial, cultural and social facilities in tandem with new residential development and accordingly a 10% increase in population is appropriate.

### **Self Sustaining Town**

#### *Malahide*

The settlement contains a strong village centre structure with a regional park and access to a high level of local amenities. The settlement is served by the DART. Housing delivery has been provided at a steady pace on local area plan lands. Development on remaining lands is required to be undertaken by a masterplanning process. Having regard to the limited area of land remaining, a 5% population figure is considered acceptable.

#### *Towns and Villages*

Within the Metropolitan Area, limited development is occurring outside of the areas indicated above. Local Area Plans have been provided for rural villages such as Kinsealy and Rivermeade, within which phasing will control development at appropriate levels. It is considered that a 5% population increase will facilitate appropriate development levels within the towns and villages in the metropolitan area.

### **Core Area**

#### **Self-Sustaining Towns**

##### *Balbriggan*

Balbriggan is a self-sustaining town of significant scale with a well-defined town centre. It is acknowledged that employment development in the town is required to create a more sustainable community. The town is served by a railway line, has access to a regional park and harbour and contains significant employment zoned lands, including the most significant High Technology zoned landbank in the 'Core' area. Residential development is being delivered at a steady rate within the town in recent years. The regeneration of the town is a key aim of FCC and is being managed through the targeted 'Our Balbriggan' strategy for improved public realm, active land management and public spaces to provide a robust vibrant centre. Objectives Balbriggan 1- 15 in the Development Plan set out the assets to be developed to aid sustainable growth in the settlement. Having regard to the scale of the town and the ongoing strategies underway, it is considered that 8% growth is sustainable.

##### *Rush*

The aim of the Development Plan is to expand the commercial, retail and employment within Rush. The suite of Objectives 1 – 21 for Rush set out the sustainable development context for the settlement, including the regeneration and improvement of the town centre. Having regard to the level of housing development which has taken place in Rush, it is considered that a 5% growth level is appropriate.

##### *Skerries*

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Skerries is a compact coastal town served by a railway station. Benefiting from a well defined town centre and access to coastal amenities and a regional park, it is considered that future residential development would be managed through a masterplanning process. A 5% growth rate is considered appropriate having regard to the need to manage growth in line with the existing population.

### *Lusk*

The development strategy for Lusk within the Development Plan reflects its status as a self-sustaining town, with objectives to protect the character of the historic core, to consolidate development within well defined boundaries, provide retail at an appropriate level for the towns needs. Having regard to the level of development undertaken in the town, it is considered that a 5% growth projection is appropriate.

### *Towns and Villages*

The other settlements within the Core area are rural villages and the towns of Balrothery and Loughshinny. It is an objective of the Development Plan that all villages have a Local Area Plan. Local Area Plans guide and phase development in such locations. Growth of housing in these settlements is at a moderate pace, generally managed by LAPs. It is considered that 4% increase is an appropriate rate to ensure that growth is managed in accordance with the capacity of the villages.

### *Countywide Rural*

As per the Rural Settlement Strategy in the Development Plan, it is the objective of FCC to rural generated housing requirements of the local rural community. Having regard to the location of the county, the provision of suitable sites within Rural Clusters and the modest growth expected outside of urban areas, it is considered that a 2% growth in the population of rural Fingal is commensurate.

The settlement descriptions above set out the targeted growth rate across each settlement within the County. These growth rate allocations are in support of the on-going development of the County in accordance with the NPF and the RSES. Fingal County Council is committed to ensure the County and settlements develop in a sustainable way and supports the key principles of healthy placemaking, climate action and economic opportunity and has allocated growth rates accordingly.

The RSES indicates that Local Authorities should consider lands with better prospects for delivery in the short term whilst also pursuing the more strategic lands through an Active Land Management Strategy. This was underlying basis of the growth strategy outlined above and consequently, lands which are actively delivering housing, have valid planning permissions and have infrastructure capacity have been allocated the largest percentage of growth. These factors, coupled with the settlement's location in the core or the metropolitan area were part of this decision process.

Fingal County Council and the Development Plan process are currently within a transitional phase. The Development Plan review process formally commences in 12 months. Analysis of the issues required to be addressed in the Development Plan are commencing imminently and will deal with issues as varied as adaptation and mitigation for climate

change, housing provision, planning for an aging society, regeneration of centres, green networks, sustainable infrastructural systems, while continuing important themes such as compact growth, economic development and placemaking. These matters along with HNDA, will be provided in significant detail during the development plan review process.

An evaluation of all undeveloped residential lands in each settlement will be carried out as part of the formal review of the Development Plan. In the meantime, and as shown above, new residential development will be focused on appropriately zoned lands within the County, within appropriate locations proximate to existing settlement centre lands where infrastructural capacity is readily available, and they are along an existing or proposed high quality public transport corridors and on appropriate infill sites in the town centres, in a phased manner alongside the delivery of appropriate physical and social infrastructure.

Furthermore, the zoning of land in the forthcoming Development Plan and any other land use plan shall comply with the requirements as detailed in Appendix 3 of the NPF relating to a methodology for a tiered approach to land zoning. This methodology requires that land should not be zoned for development unless there is existing service capacity available (Tier 1) or the lands have the potential to become fully serviceable (Tier 2) during the life of the plan. Future land use plans shall therefore contain a detailed Infrastructural Assessment for residential land that provides for an evidence-based approach to the servicing of potential sites to establish their suitability for zoning. Other planning considerations such as the overall planned levels of growth, location, suitability for the type of development envisaged, availability of and proximity to amenities, schools, shops or employment, accessibility to transport services, etc., shall also be considered. The NPF also requires that land use plans target of 50% of all new homes within or contiguous to the built up area of Dublin City and Suburbs and at least 30% in other settlements. The built-up footprints have been defined by the CSO in the Census of Population

Include new objectives in Chapter 2 and 12 to read:

- Objective SS 02a  
Development will be permitted in principle on lands where there is a Local Area Plan or Masterplan in place and only when these lands are substantially developed will permission be granted for the development of lands without such a framework. Should the lands identified within a LAP or Masterplan not come forward for development in the short term, consideration will be given to other lands.
- Objective SS 02b  
Focus new residential development on appropriately zoned lands within the County, within appropriate locations proximate to existing settlement centre lands where infrastructural capacity is readily available, and they are along an existing or proposed high quality public transport corridors and on appropriate infill sites in the town centres, in a phased manner alongside the delivery of appropriate physical and social infrastructure.

Objective DMS03a

Submit a detailed statement for developments on land zoned residential or mixed use, in excess of 100 residential units outlining:

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- Compliance with the sequential approach in relation to development of the area,
- Potential for sustainable compact growth
- The scale of employment provision and commuting flows
- Extent of local services provision i.e. administration, education- particularly third level, health, retail and amenities
- Transport accessibility
- Environmental sensitivities, resources and assets and
- Current and planned infrastructure capacity

2. Section 10 (2A) of the Planning and Development Act requires that a core strategy outlines a settlement hierarchy. It is recommended the text is amended throughout the Variation accordingly.

3. It is recommended the following statement is included in Section 1.2 of the Development Plan.

Where any objectives of the Development Plan are considered to be materially inconsistent with those of the National Planning Framework, the Regional Spatial and Economic Strategy or the Specific Policy Requirements of Guidelines issued under Section 28 of the Act, the aforementioned documents shall take precedence.

4. The following text will replace page 38 and 39 of the current Development Plan (and page 32-33 of the Variation document):

While Table 2.8 outlines the potential to deliver 43,104 units, it must be interpreted in the County Fingal context, in that the land will become available on a phased basis. The key tenet of the overall Settlement Strategy is the continued promotion of sustainable development through positively encouraging consolidation and densification of the existing urban built form – and thereby maximising efficiencies from already established physical and social infrastructure. This principle of compact growth and regeneration is also a key facet of the NPF and the RSES.

We recognise this level of development is unlikely to be developed over the lifetime of this County Development Plan rather it outlines the optimal sustainable development strategy for the County over a much longer time period and can only be developed in tandem with the timely delivery of the necessary physical and social infrastructure.

As outlined earlier in this Chapter, Appendix 2 of the NPF Implementation Roadmap identifies a population of 333,000 persons in 2026 and 349,000 persons in 2031 for Fingal. These figures are confirmed in Appendix B of the adopted RSES. Any review of the Development Plan will be required to address these figures and a revised Core Strategy will be developed.

This represents a growth of 8.7% across Fingal. Without prejudice to this future, for the purposes of this Variation, it is expected that Fingal will grow for the remaining period of the Development Plan. Having regard to the locations of active sites and planning

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permissions, it is expected a higher rate of growth will occur in the Metropolitan area, versus the Core area.

This Variation must in the short-term plan for an additional 15,285 housing units. These units shall be located at appropriate locations proximate to existing settlement centre lands where infrastructural capacity is readily available, and they are along an existing or proposed high quality public transport corridor.

There are also areas within the existing footprint of the settlements which will allow for smaller schemes through infill and town centre regeneration.

The identification of the lands at Lissenhall as longer-term development reflects the significant short-medium term physical and social infrastructural constraints associated with the development of this area such as the provision of MetroLink and a LAP.

It is also noted that the housing capacity allocated to Hansfield SDZ could be excluded from the total figures, as per the DoEHLG *Guidance Notes on Core Strategies* issued in November 2010. The DoEHLG state that 'any excess (of lands or housing capacity) will not normally include lands identified for the strategic long term development as part of Strategic Development Zones or major regeneration sites within key areas...'. Notwithstanding this, in order to identify the full potential of zoned lands within the County these figures have been included in Tables 2.6 and 2.8.

The development of the strategic lands at Lissenhall will be subject to a Local Area Plan, SEA and Appropriate Assessment and will also be dependent on the concurrent delivery of adequate water services and upgraded /planned public transport infrastructure.

In relation to the development of other lands within the County, Local Area Plans, the SDZ at Hansfield, and Masterplans, will establish more detailed phasing or prioritisation for the delivery of residential uses, other uses, or infrastructure, as appropriate. Such locally-based plans and related requirements are set out in Chapter 4, Urban Fingal.

5. In Chapter 3 – Placemaking include additional text in the Strategic Development Zones, Local Area Plans and Masterplan Section.

It is Fingal's priority to form effective and innovative approaches to mobilise development land to create housing and quality urban neighbourhoods. Consequently, any development, is positioned against the national, regional and local policies and objectives. Facilitating the provision of the right quantity of appropriate housing in the right locations that is accessible for all residents is crucial for Fingal County Council.

The provision of housing in Fingal must be in line with the National Planning Framework's and the Regional Spatial and Economic Strategy's projected population for the County. As indicated in Chapter 2 of this Development Plan, development will only be permitted on lands where there is a development framework, such as a Local Area Plan or a Masterplan, in place. This policy, in itself, will naturally result in a phasing of land, i.e. those with a framework will be available for development before those without.



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To ensure the development of sustainable communities that are economically, environmentally and socially healthy and resilient, all future Local Area Plans and Masterplans will be required to outline specific phasing arrangements. These policies enable the delivery of quality dwellings and help create and maintain sustainable communities and neighbourhoods. The phasing arrangements should be founded on sequential development from the centre out and an asset based approach. This approach would outline the social, economic and natural assets that are required within a settlement to ensure the proposed growth is sustainable in the longer term. This will ensure that settlements identified for significant population and/ or employment growth are supported by the requisite investment in infrastructure and provision of employment, amenities and services at the right time.

6. It is recommended that Table 2.9 and Figure 2.3 is edited as per OPR recommendation no. 5 and shown below.

<b>Metropolitan Area</b>	<b>Core Area</b>
<b>Dublin City and Suburbs Consolidation Area</b> Blanchardstown	
<b>Consolidation Areas Within Dublin City and Suburbs</b> Baldoyle, Castleknock, Clonsilla, Howth, Baskin, Mulhuddart Village, Portmarnock, Sutton, Santry (Incl. Ballymun) Balgriffin & Belcamp Charlestown & Meakstown	
<b>Key Town</b> Swords	
<b>Self Sustaining Growth Towns</b> Donabate Malahide	<b>Self Sustaining Towns</b> Balbriggan Lusk Rush Skerries
<b>Towns and Villages</b> Portrane Coolquay Kinsealy Rivermeade Rowlestown	<b>Other Core Towns and Villages</b> Balrothery Loughshinny Ballyboghil Naul Balscadden Oldtown Garristown

**Rural – Clusters and Rural Area**

See Chapter 5 entitled ‘Rural Fingal’ for a full list of rural clusters

Figure 2.3



7. It is recommended a further objective is included in Chapter 2 of the Development Plan which states:

Objective SS01a

Support the implementation of and promote development consistent with the National Strategic Outcome of Compact Growth as outlined in the NPF and the Regional Strategic Outcome of Compact Growth and Regeneration as set out in the RSES.

8. Replace Objective PM42 with the following wording:

Implement the policies and objectives of the Minister in respect of ‘Urban Development and Building Heights Guidelines’ (December, 2018) and Sustainable Urban Housing: Design Standards for New Apartments (March, 2018) issued under section 28 of the Planning and Development Act, as amended.

EMRA

9. It is recommended a further objective is included in Chapter 2 of the Development Plan which states:

Objective SS03a

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Support the implementation of and promote development consistent with the National Strategic Outcome of Compact Growth as outlined in the NPF and the Regional Strategic Outcome of Compact Growth and Regeneration as set out in the RSES.

10. Furthermore, it is recommended the following objectives are edited as follows:

### New Objective SS01b

Consolidate within the existing urban footprint, by ensuring of 50% of all new homes within or contiguous to the built up area of Dublin City and Suburbs and 30% of all new homes are targeted within the existing built-up areas to achieve compact growth of urban settlements, as advocated by the RSES.

### 11. Objective SS03

Identify sufficient lands for residential development in order to achieve the housing and population targets set out in the Core Strategy, **with a focus on urban regeneration and compact growth**, while ensuring that excess lands surplus to this specific requirement are not identified, in order to prevent fragmented development, uneconomic infrastructure provision and car dependent urban sprawl.

12. Include additional text after table 2.8, after final paragraph (i.e. above Section 2.7):

The zoning of land in any forthcoming land use plan shall comply with the requirements as detailed in Appendix 3 of the NPF relating to a methodology for a tiered approach to land zoning. This methodology requires that land should not be zoned for development unless there is existing service capacity available (Tier 1) or the lands have the potential to become fully serviceable (Tier 2) during the life of the plan. Future land use plans shall therefore contain a detailed Infrastructural Assessment for residential land that provides for an evidence-based approach to the servicing of potential sites to establish their suitability for zoning. Other planning considerations such as the overall planned levels of growth, location, suitability for the type of development envisaged, availability of and proximity to amenities, schools, shops or employment, accessibility to transport services, etc., shall also be considered. The NPF also requires that land use plans target of 50% of all new homes within or contiguous to the built up area of Dublin City and Suburbs and at least 30% in other settlements. The built-up footprints have been defined by the CSO in the Census of Population

13. Amend Section 6.8:

~~Delete: Additionally, Fingal's Retail Hierarchy is required to accord with the settlement hierarchy identified for the County in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 (RPGs) issued in 2010.~~

14. It is recommended the Section 'Total Capacity – Fingal Development Plan, 2017 – 2023, updated' is edited as shown below:

Practice in relation to previous Regional Planning Guidelines (RPGs) and core strategies, has generally been to match future population targets to the physical extent of land being zoned

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for development, based on assumptions related to density and household occupancy. A further factor of 50% of the identified land requirement has also been universally applied as 'headroom'.

This practise has now been replaced with the headroom now relating to population projection, instead of zoned land. The RSES considers the concept of headroom based solely on zoned land provision and does not account for housing yield arising from the re-use of existing housing stock, mixed-use development, urban intensification or infill or brownfield development. The NPF Roadmap population projections already incorporate 25% headroom figures for all parts of the country (Implementation Roadmap for the National Planning Framework, Appendix 2). In Fingal this may be supplemented by additional 25% headroom, (page 5 of the NPF Roadmap). As noted in the RSES, the application of headroom is particularly relevant to urban areas, where the aim is to target at least half of future housing delivery within existing built-up areas.

~~The reservation of lands at Lissenhall, situated within the Metropolitan Area, continues to account for the majority of this headroom allocation.~~

Others

15. Include further references to Our Balbriggan in Chapter 4, Section 4.3 Balbriggan, of the Development Plan, as follows:

Balbriggan is the largest of the Self-Sustaining Towns in the Core Area. Located c.18 kms north of Swords, with easy access off the M1 Motorway, it is also served by the main Dublin to Belfast rail line and commuter services to Dublin City. It has developed as a major residential town in the north of the County with a young and expanding population which has more than doubled over the past 20 years. The current population is estimated at c.20,000. Major infrastructural projects involving major upgrades to the water supply, foul drainage and roads infrastructure have been carried out throughout the town and its environs. Balbriggan is eFibre broadband enabled with superfast fibre delivering speeds of up to 100Mb.

~~The Urban Improvement Scheme has significantly enhanced the streetscape of the town centre. The Urban Design Framework Plan identified potential development sites within the town centre. Implementation of this Plan is central to the regeneration of the town centre. In addition, the Balbriggan Public Realm Plan – 'The Heart of Balbriggan' sponsored by the Heritage Council, and underpinned by a strong public participation framework, seeks to focus on strengthening the social, economic and environmental capital of the town promoting the pivotal role of the town centre area in developing a sustainable community. These initiatives, together with the infrastructural and environmental improvements, will provide the impetus for further development and investment in Balbriggan.~~

Fingal have recently developed and published the 'Our Balbriggan 2019-23 Rejuvenation Plan', which is set to transform Balbriggan Main Street and Harbour. Fingal are investing in public realm, town centre improvement and rejuvenation to provide a more vibrant and vital centre to the town, working with stakeholders, increasing employment, attraction for

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investment and promoting industrial lands. Over 4,000 locals took part in a survey to prioritise a list of suggested improvements for the 'Our Balbriggan' Plan.

A Balbriggan Leadership Group prepared a menu of different initiatives for the €20million-plus plan. Balbriggan as a community has come together with the group of stakeholders, led by Fingal County Council, to engage in a collaborative and unified way to prioritise the ideas which will best address the socio economic needs of the town. Strong progress is being made across the first "20 Things in the first 12 Months" listed in the Our Balbriggan Rejuvenation Plan, including supporting successful community engagements on the development of the Bremore Regional & Amenities Park, Balbriggan to Skerries section of the Fingal Coastalway and Harry Reynolds Cycling & Pedestrian routes.

Implementation groups have met and are progressing work across the plans four pillars: Local Economy, Public Realm, Education, Training & Employment & Community Affairs & Integration.

The availability of zoned lands for high technology and general industrial development, together with the significant infrastructural and environmental improvements with easy access to major transport corridors, ports, rail and air networks, offer considerable potential for the town. Fingal County Council is committed to working with representative stakeholders such as the IDA, Enterprise Ireland and the local Chamber of Commerce, to attract and facilitate new employment generators into the town. Balbriggan Chamber of Commerce is an important intermediary to helping local business grow through a range of on-going initiatives to boost the local economy.

Balbriggan Creative Quarter, located around the railway station, is a community of design-focused small businesses, sole traders and start-ups where the aim is to cultivate an open, professional atmosphere for creative development opportunities. Balbriggan BEAT Centre located at Stephenstown offers a range of services to start-ups and developing businesses and encourages business development by way of mentoring and training.

Balbriggan has considerable tourism potential in terms of its natural and built heritage and amenities, particularly given its coastal location with its attractive sandy beach and harbour. Balbriggan Historic Town Core is a designated Architectural Conservation Area.

With continued inward investment, [through the Our Balbriggan Plan](#), Balbriggan has the potential to develop as a dynamic sustainable community in which to live, work, visit and invest.

16. Include additional text at Section 6.12 as follows:

The **Core area** comprises the northern part of the County, and the majority of Fingal's rural areas. The largest town in the Area is Balbriggan, designated as a **Self-Sustaining Town and is the largest of the Self-Sustaining Towns in the Core Area**. Balbriggan functions as the primary town for service and employment delivery for an established catchment, including a wide rural area in the north of the County. There are a number of existing business and industrial parks in the Balbriggan area including Balbriggan Business Campus, Fingal Bay, KVS, and M1 Business Parks, Balbriggan and Stephenstown Industrial Parks. The Beat Enterprise and Development Centre (BEAT) is an incubator centre for new business ventures and provides a range of services to start ups and developing business

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The opening of Business Parks and industrial complexes near Junctions 5 (Balbriggan South) and 6 (Balbriggan) together with the benefits accruing from the M1 motorway, will increase the attractiveness of Balbriggan to businesses that require easy access to Dublin airport and the IFSC in Dublin city. The readily available workforce, together with the power, natural gas, and fibre-optic resources can be used to attract large-scale employers to the area.

### **Overall Recommendation**

It is recommended that the Council make proposed Variation No. 2 to the Fingal Development Plan 2017-2023 as proposed by passing the following resolution:

That Fingal County Council having prepared and published the proposed Variation No. 2 to the Fingal Development Plan and having taken into consideration the representations received and having considered the report of the Chief Executive and its recommendations hereby resolves pursuant to Section 13(5) of the Planning and Development Act to adopt proposed Variation No. 2 to the Fingal Development Plan.