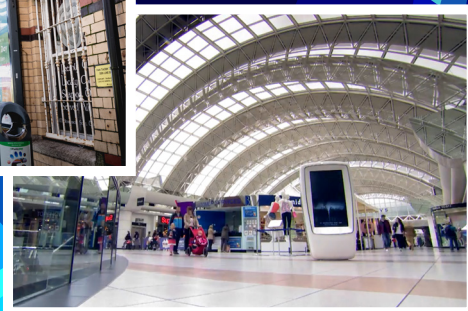
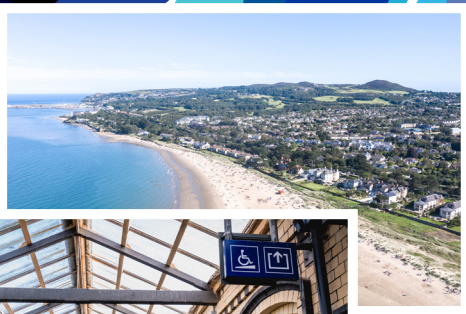




FINGAL DEVELOPMENT PLAN 2023-2029

**CHIEF EXECUTIVE'S
REPORT PRE-DRAFT
CONSULTATION
2ND JULY 2021**



Review of the Fingal Development Plan 2017-2023 and Preparation of a New Fingal Development Plan 2023-2029

Chief Executive's Report Pre – Draft Consultation Process

**Report to Council under Section 11 (4) of the Planning and
Development Act 2000, (as amended).**

Chief Executive's Report Pre – Draft Consultation Process

**Chief Executive
AnnMarie Farrelly**

**Director of Services
Matthew McAleese**

**Senior Planner
Róisín Burke**

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Part 1: Introduction to Chief Executive's Report

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INTRODUCTION:

Fingal County Council is currently in the process of preparing a new Development Plan for 2023-2029. In accordance with Section 11 of the Planning and Development Act 2000 (as amended) Fingal County Council have commenced the review of the Fingal Development Plan 2017–2023 and has begun the preparation of the proposed Fingal Development Plan 2023 – 2029. The preparation of the Development Plan is one of the most important functions of the Council acting as a blueprint for the development of Fingal from a physical, economic, social and environmental viewpoint over the lifetime of the Plan. The Fingal Development Plan 2023-2029 will set the longer-term vision for the County's future. The preparation of a new Development Plan involves three key stages. The process to prepare a new Development Plan for the period 2023-2029 will take almost two years, finishing in late March 2023.

The Development Plan review has come at a challenging and unprecedented time arising from the impacts of the Covid-19 pandemic, climate change and Brexit. However, these challenges also present opportunities to build on our mission to make Fingal 'the place to live, work, visit and do business'.

The process of making a Development Plan must be open, transparent and inclusive. All interested individuals and organisations, at Local, Regional and National level, must be given adequate opportunity to comment or make submissions for consideration by the Elected Members before the policies, objectives and measures to be included in the Plan are decided upon. Consultation provides a key opportunity for citizens, stakeholders, community groups, businesses and the general public, including children, to ensure that their views are considered in shaping the future of their community and their County.

PURPOSE AND CONTENTS OF THE CHIEF EXECUTIVE'S REPORT

The purpose of the Chief Executive's Report is to present the outcomes of the initial consultation process carried out prior to the preparation of the Draft Development Plan. This report forms part of stage 1 of the statutory process of making a new Development Plan. Its primary function is to list and summarise the main issues raised in the submissions received during the Pre-Draft consultation process and to provide recommendations on the policies to be included in the Draft Development Plan. This report will be issued to the Elected Members of Fingal County Council for consideration.

The report is divided into a number of parts as follows:

- Part 1 outlines the purpose and legislative requirements of this report, provides details on the Pre-Draft consultation process and provides an executive summary on the submissions received. It also includes information regarding the Draft Core Strategy.
- Part 2 summarises the submissions from the Office of the Planning Regulator, The National Transport Authority and the Eastern and Midland Regional Assembly and gives the Chief Executive's response and policy recommendations arising from these submissions.
- Part 3 contains summaries of the submissions received, the Chief Executive's response and the Chief Executive's recommendations on the policies to be included in the Draft Development Plan, grouped under themes.
- Part 4 contains the Chief Executive's policy recommendations.
- Part 5 contains Appendices A-G

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- Appendix A: Public Notice
- Appendix B: Prescribed Bodies and Other Bodies Informed
- Appendix C: Persons/Bodies that made Written Submissions
- Appendix D: Matters that must be included in the Development Plan and those Matters that may be included.
- Appendix E: Statutory Timeframe for the Preparation of the new Fingal Development Plan.
- Appendix F: Principal International European, National, Regional and Local Policy Documents and Guidelines and Plans.
- Appendix G: Glossary of Acronyms

Next steps

The next step involves the Elected Members considering the report within a period of up to 10 weeks. Following this, the Members may issue directions to the Chief Executive, regarding the preparation of the Draft Development Plan. Any such directions shall be strategic in nature, consistent with the Draft Core Strategy, shall take account of the statutory obligations of any Local Authority in the area, and shall take account of any relevant Government or Ministerial policies or objectives.

Members will be invited to attend a workshop on 14th July 2021 to be briefed in guidance relating to submitting motions.

In accordance with section 11(4)(f), in issuing directions the Elected Members shall be restricted to considering the proper planning and sustainable development of the area to which the Development Plan relates. Within 12 weeks following the receipt of any directions from the Elected Members, the Chief Executive shall in accordance with Section 11(5)(a) of the Act, prepare a Draft Development Plan and submit it to the Members of the Planning Authority for their consideration.

The Members are required to consider the Chief Executive's Draft Plan within 8 weeks of its submission to them and approve the Draft Plan to go out on public display.

Within 2 weeks of consideration of the Draft Plan by the Members, the Chief Executive is required to publish notice of the preparation of the Draft Fingal Development Plan 2023-2029 to go out on display in February 2022. The Draft Fingal Development Plan will be on public display for a period of 10 weeks from the February 2022 to May 2022. An indicative timeline for the preparation of the new Fingal Development Plan is provided below.

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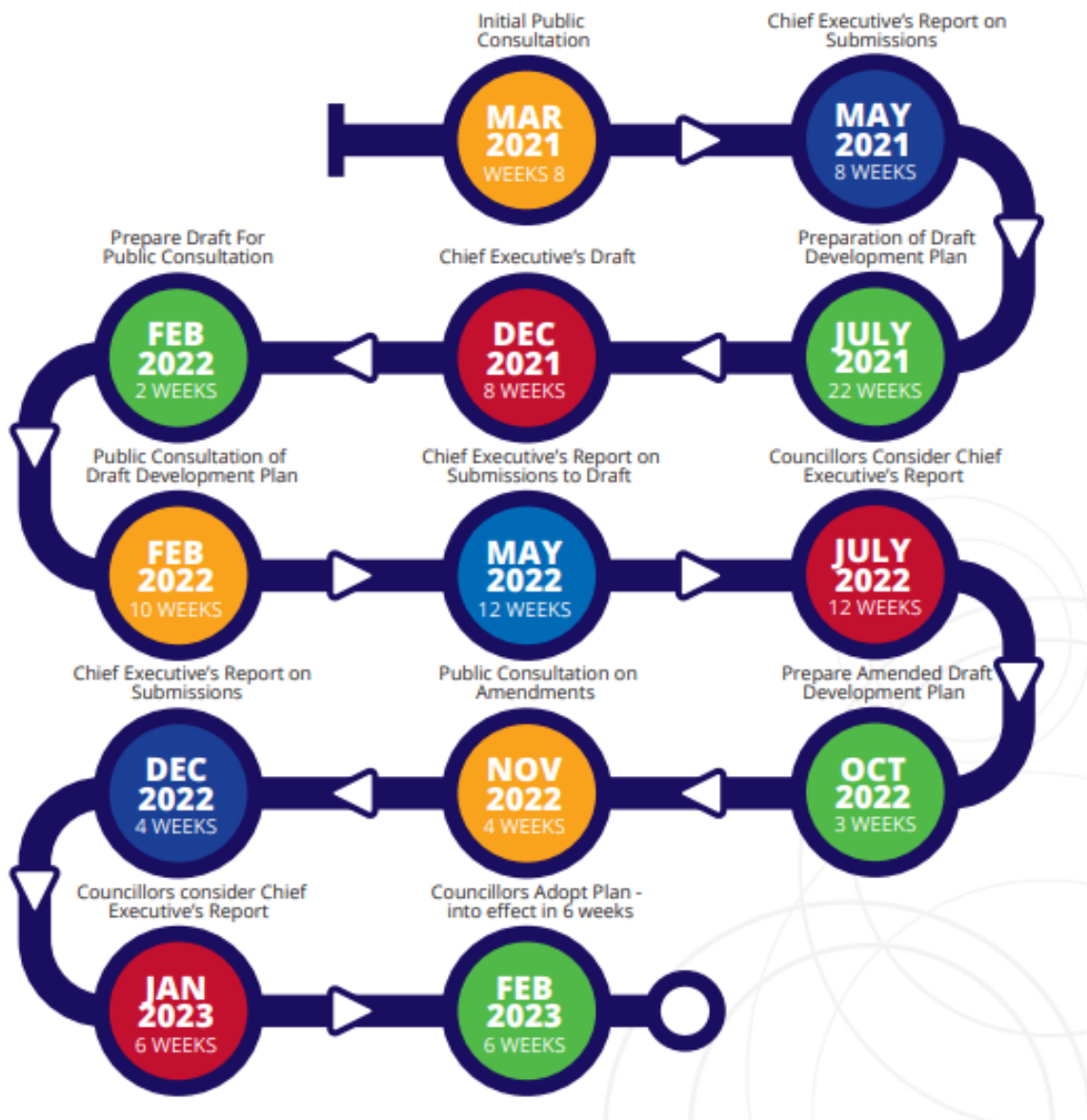


Image 1: Indicative timeline for the preparation of the new Fingal Development Plan

Explanatory Note:

The Chief Executive's report contains the applicable submission reference numbers (e.g. FIN-C377-01) under the respective themes.

For the purposes of this report, the term 'current Plan' refers to the Fingal Development Plan 2017-2023 and the term 'Draft Plan' refers to the Draft Fingal Development Plan, 2023-2029.

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LEGISLATIVE BACKGROUND FOR THE FINGAL DEVELOPMENT PLAN

The prescribed process and timetable for the preparation of the Fingal Development Plan 2023-2029 is outlined in Appendix E of this report. The process set out in the Planning and Development Act, 2000 (as amended) gives a ninety-nine-week period for the adoption of the Plan and involves public consultation at three separate stages which are indicated on the timetable above. The first stage of public consultation ran from 12th March 2021 to the 12th May 2021.

The Planning and Development Act, 2000 (as amended) sets out mandatory objectives which must be included in a Development Plan. These include, inter alia, objectives for the zoning of land, the provision of infrastructure, Core Strategy and Housing Strategy, the conservation and protection of the environment, climate change adaptation and the integration of the planning and sustainable development of the area with the social, community and cultural requirements of the area and its population. Other non-mandatory objectives are also referred to in the Planning Act. There is also a requirement for a Strategic Environmental Assessment and an Appropriate Assessment of the new Plan.

Legislative Background for the Chief Executive's Report

Section 11 (4)(a) of the Planning and Development Act, 2000 (as amended), sets out the requirements in relation to the preparation of a Chief Executive's Report. The Chief Executive's Report is required to deal with any submissions or observations received on foot of the notifications and consultations (carried out under Section 11(2) and (3) of the Act), with, inter alia, the public, prescribed bodies, service providers and the Board.

In accordance with Section 11 (4)(b) the Chief Executive's Report must:

- (i) List the persons or bodies who made submissions or observations, as well as any persons or bodies consulted;
- (ii) Summarise the issues raised in the submissions and during the consultations, where appropriate, but shall not refer to a submission relating to a request or proposal for zoning of particular land for any purpose;
- (iii) Give the opinion of the Chief Executive on the issues raised;
- (iv) In this regard, the Chief Executive's opinion must take into account (a) the proper planning and sustainable development of the area, (b) the statutory obligations of any Local Authority in the area, and (c) any relevant policies or objectives of the Government or any Minister of the Government.
- (v) Finally, the report shall state the Chief Executive's recommendations on the policies to be included in the Draft Development Plan.
- (vi) The Chief Executive's Report must then be submitted to the Elected Members of the Planning Authority or a committee of the Planning Authority for their consideration.

Following consideration of the report the Elected Members may then issue directions to the Chief Executive regarding the preparation of the Draft Development Plan (Section 11(4)(d)). These Directions shall be strategic in nature, be consistent with the Draft Core Strategy and shall take account of the statutory obligations of the Local Authority in the area and any relevant policies or objectives of the Government or of any Minister of the Government.

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Section 12(18) of the Act defines statutory obligations:

“statutory obligations includes, in relation to a Local Authority, the obligation to ensure that the development plan is consistent with –

(a) the National and Regional development objectives specified in –

(i) the National Planning Framework, and

(ii) the Regional Spatial and Economic Strategy, and

(b) specific planning policy requirements specified in the guidelines under subsection (1) of section 28.”

PRE-DRAFT CONSULTATION PROCESS

The first consultation phase (Pre-Draft phase) commenced on the 12th March 2021 and concluded on the 12th May 2021, with the publication of a ‘Section 11 notice’ indicating Fingal County Council’s intention to review the existing Fingal Development Plan 2017–2023 and to prepare a new Fingal Development Plan for the period 2023 – 2029. This notice was placed in the Fingal Independent, Irish Independent, The Herald, Gazette and North Side People on the 12th of March 2021, see Appendix A.

A Strategic Issues Paper and Information Booklet (circulated to all households in the County) were published, which asked ‘**How do you see Fingal in 2029?**’. The Strategic Issues Paper provides the context for the preparation of the proposed Development Plan and identifies how the proposed Plan fits into the hierarchy of legislation, including the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES).

The Strategic Issues Paper presents an overview of the main planning and development issues in Fingal and seeks to encourage public debate on what broad issues should be considered in the new Plan. The Fingal Development Plan presents an opportunity for the general public to shape Fingal for the future and ‘have your say’ when it comes to important issues such as housing, economic development, community and heritage. The Strategic Issues Papers addressed seven key themes:

- Theme 1: People and Place
- Theme 2: Climate Action
- Theme 3: Connectivity & Movement
- Theme 4: Employment, Economy & Dublin Airport
- Theme 5: Cultural Heritage
- Theme 6: Green Infrastructure & Natural Heritage
- Theme 7: Infrastructure & Utilities

Notwithstanding the restrictions placed on holding public events and meetings due to Covid-19, the level of engagement at this stage of the process was very high with a total of 551 no. submissions received.

We would like to take this opportunity to sincerely thank all those who made submissions, all those who gave of their time to attend our virtual webinars and engaged with officials and Elected Members.

The content of all submissions has been considered in full in the preparation of the Chief Executive’s Report. It is noted that submissions received including through the Consult Fingal Portal were generally uploaded under one or a number of the 7 no. specific themes e.g. Climate Action, Cultural Heritage.

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In summarising and responding to the submissions, it will be noted that in some instances, the responses may be addressed elsewhere in the report and can be located by their allocated submission number.

The Covid-19 public health crisis and the related restrictions on public gatherings provided a significant and unprecedented challenge to the consultation process. We had to look for new ways to consult with the public at a time when the ‘traditional’ drop in consultation evenings, workshops and information sessions were not possible. A communications strategy was adopted to ensure that awareness of the plan process spread through the County and beyond. Central to this was the social media campaign. Traditional advertising avenues such as billboards, bus stops, local media and radio were also used. Engagement in the process was therefore actively encouraged through various measures. The suite of measures utilised is detailed below:

- **Branding**
A new brand was developed which gives the Development Plan process its own distinctive identity. This branding was applied to documentation and media.
- **Social media**
A social media campaign to publicise the Development Plan process engaged with Twitter, Facebook, Instagram, LinkedIn and You Tube which included biteable video clips, updates on public consultation events and recordings of the four themed webinars.

To clarify, impressions are a total tally of the number of times a post has been seen. It is also referred to as reach or views by some channels. Engagement means the total number of people who interacted in some way with the Tweet/post, who retweeted, shared, liked or commented on the post. Table 1 below provides details on the level of interactions from the public with social media employed for this first stage of the process.

Channel	Posts	Impressions	Engagements
Twitter	30	58,536	779
Facebook	35	69,338	746
Instagram	13	11,489	84
LinkedIn	7	4,945	669
You Tube	5	884	6
Total Social Media	90	145,192	2,284

Table 1: Social media channels and information on public interaction



Image 2: Images used in social media posts

- **Podcasts**
In Episode 9 of Inside Fingal, Gerry McDermott talks to Senior Planner Róisín Burke about the Development Plan process, the importance of the Development Plan, the issues facing Fingal and how

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to make a submission. The podcast has had a total audience of 197, was downloaded 108 times and had 98 internet listens.

- **Digital Article**

An article on the Development Plan appeared on pages 4-5 Issue 18 of FCC's digital e-zine Fingal News. Page 4 had 1,012 impressions and page 5 had 974 impressions.

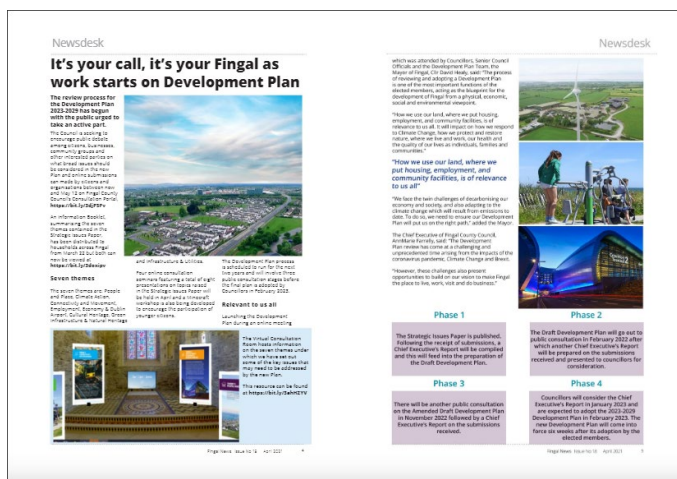
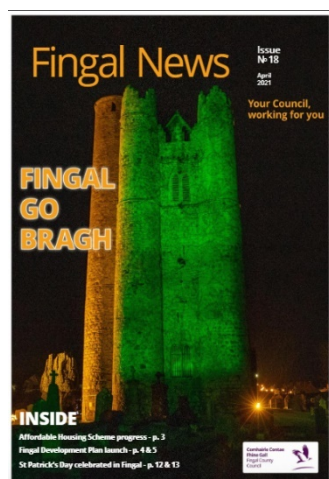


Image 3: Fingal News Issue 18

- **Webpage and Online Portal**

A dedicated webpage (www.fingal.ie/developmentplan) was established to provide information with the ability to make online submissions through the consult portal <https://consult.fingal.ie/en/browse>. A dedicated email address was also developed Fingal.DevelopmentPlan@fingal.ie. There were 6,927 hits on the website and circa. 1,300 hits on the consult portal during the public display period.

The webpage and consult portal displayed the key elements in terms of content and included the following:

- An introductory video highlighting the key themes and inviting the public to 'Have Their Say'.
- Details on how to make a submission via the various different means, including via email, post or the online portal.
- Links to access the Strategic Issues Papers and the Development Plan Brochure.
- Links to news items relating to the upcoming webinars and key dates for making submissions
- Supporting information, which included the existing Fingal Development Plan and links to access the websites of the Office of the Planning Regulator, the Department of Housing, Local Government and Heritage, the National Planning Framework and the Regional Spatial and Economic Strategy for the Eastern and Midlands Region.
- Recordings of the 4 webinar events which took place in April 2021.
- A Virtual Consultation Room.
- A section on 'Development Plan 'Frequently Asked Questions'.

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- An online portal to facilitate the making of submissions under themed headings was provided on the webpage. The portal facilitated compliance with the Planning and Development Act 2000 (amended), which requires all submissions are uploaded online within 10 days of receipt.

551 no. submissions were received during the consultation period. 62 no. of these submissions were received via the post. An executive summary of the submissions is provided in the report below and summaries of the submissions, including the Chief Executive's response and the Chief Executive's recommendations on policies are contained in Part 3 of this report.

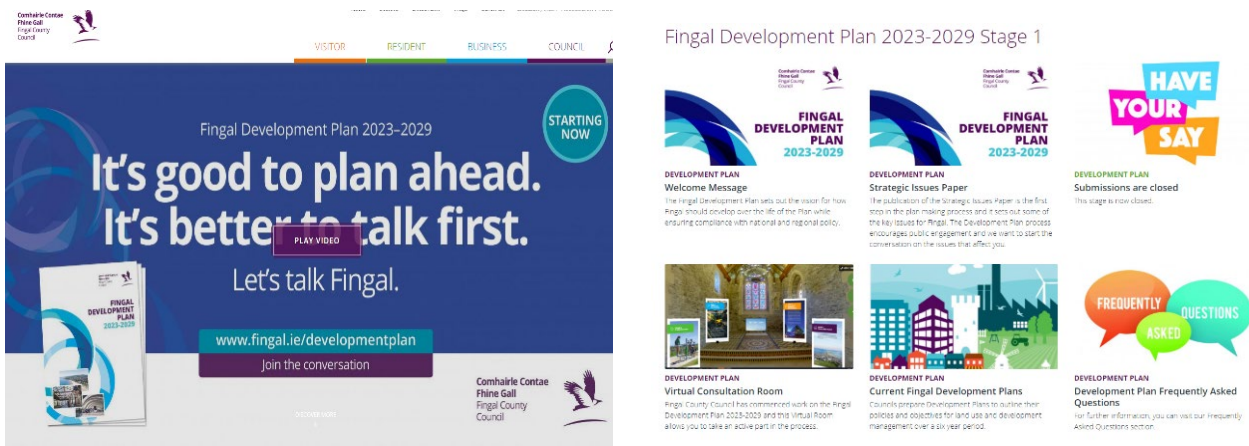


Image 4: Website homepage

- **Issues and Background papers**

A Strategic Issues Paper with seven key themes was published and made available on our dedicated website www.fingal.ie/developmentplan. The seven key themes are: People and Place, Climate Action, Connectivity and Movement, Employment, Economy & Dublin Airport, Cultural Heritage, Green Infrastructure & Natural Heritage and Infrastructure & Utilities.

This Strategic Issues Paper presents an overview of the main planning and development issues in Fingal and seeks to encourage public debate on what broad issues should be considered in the new Plan. The Fingal Development Plan presents an opportunity for the general public to shape Fingal for the future and 'have your say' when it comes to important issues such as housing, economic development, community and heritage.

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Image 5: Strategic Issues Paper



Image 6: Information Brochure

- **Information Brochure**

A direct mailing campaign was undertaken and an Information Brochure, summarising the seven themes contained in the Strategic Issues Paper, was distributed to all households in Fingal. This outlined details of the Plan review, the seven key themes, details of the public consultation events and how to make a submission.

- **Virtual Room for Public Consultation**

A 'Virtual Room' was developed by FCC to provide an online consultation room, which allowed the public to access a 'virtual consultation' of the pre-draft issues. The Virtual Room allowed users the experience of a drop in public consultation from the comfort of their own home. Given the restrictions and implications of the current pandemic, the Local Authority wanted to create a safe alternative to the 'traditional' drop in consultation evening.

The Virtual Room contained information on the seven themes under which we set out some of the key issues that may need to be addressed by the new Plan.

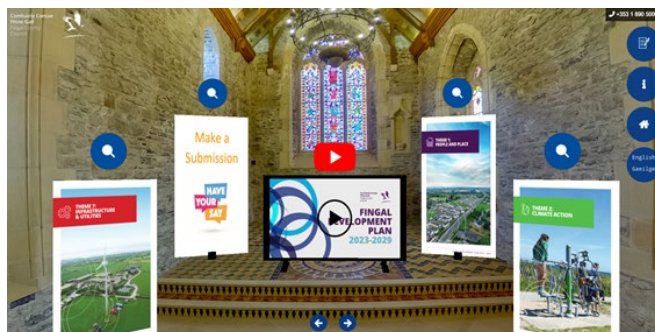


Image 7: Virtual room for public consultation

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- **Presentations to Elected Members**

Three briefing workshops for all Councillors were held on the 30th November 2020, 27th January 2021 and 2nd February 2021. Each session had a different emphasis, i.e. the plan making process, the role of the Elected Member in making a Development Plan and environmental assessment of the Plan. These live workshops were very well attended with a Q&A session taking place after each of the presentations.

- **Consultation with Prescribed Bodies & Others**

A number of meetings were held with prescribed bodies and other organisations. These were conducted on Microsoft Teams and details are provided below. A further consultation workshop with other bodies and interested parties took place on the 21st of April.

Meetings with Prescribed bodies and others	
Name of body	Date of Meeting
Eastern Midland Regional Assembly	12/04/2021
Irish Water	16/04/2021
National Transport Authority & Transport Infrastructure Ireland	20/04/2021
Eirgrid	23/04/2021
Department of Housing, Local Government and Heritage - National Monuments Service	26/04/2021
Department of Housing, Local Government and Heritage National Parks and Wildlife Service	27/04/2021
Department of Education and the Department of Further and Higher Education, Research, Innovation and Science	27/04/2021
Voice of Vision Impairment	28/04/2021
Department of Housing, Local Government and Heritage – Built Heritage	29/04/2021
Office of Public Works	29/04/2021
Consultation Workshop	
Irish Rail, Meath County Council, Department of Communications, Climate Action & Environment, An Garda Síochána, Dublin & Dun Laoghaire Education & Training Board	21/04/2021

Table 2: Meetings with Prescribed Bodies & others

- **Webinars**

Four online webinars featuring a total of eight presentations on topics raised in the Strategic Issues Paper were held in April 2021. The details of same are presented in Table 3 below. These webinars were recorded and were made available to view on www.fingal.ie/developmentplan.

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Each webinar included two presentations on the key themes, followed by a live Q&A session. The webinars were held in the evening time (7-8pm) to allow a greater number of people the option of attending. In total, 294 participants attended these webinars. Issues raised at each webinar relating to specific themes are dealt with in Part 3 of this report.

Topic	Speakers	Date	No. of attendees	No. of questions posed
Webinar 1 – People and Place	Matthew McAleese, Director of Planning & Strategic Infrastructure, FCC Fionnuala May, County Architect, FCC Margaret Geraghty, Director of Housing & Community Development, FCC	13/04/21	98	34
Webinar 2 – Heritage & Green Infrastructure	Roisin Burke, Senior Planner, FCC Christine Baker, Heritage Officer, FCC Kevin Halpenny, Senior Parks Superintendent, FCC Helena Bergin, Conservation Officer, FCC	15/04/21	97	23
Webinar 3 – Employment & Economy	Matthew McAleese, Director of Planning & Strategic Infrastructure, FCC Emer O’Gorman, Director of Economic, Enterprise, Tourism & Cultural Development, FCC Aoife Sheridan, Senior Executive Officer, Economic, Enterprise, Tourism & Cultural Development, FCC	20/04/21	37	12
Webinar 4 – Connectivity & Climate Action	Roisin Burke, Senior Planner, FCC Paul Carroll, Senior Engineer, Planning & Strategic Infrastructure Department, FCC Ronan O’Reilly, Climate Action Co-ordinator, FCC David Storey, Director of Environment Climate Action & Active Travel, FCC	22/04/21	62	9

Table 3: Information of webinars, speakers, dates, attendees & questions posed

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Fingal Development Plan Webinar Recordings



Image 8: Webinars on Development Plan webpage

- **Public Access to Submissions**

All written submissions (including attachments) are available, in full, online through the Fingal Consultation Portal at <https://consult.fingal.ie>. This enables members of the general public, and others, to view each submission electronically.

- **Engagement with Young People**

The Planning and Development Act 2000 (as amended) requires engagement with young people and groups who represent young people. A Minecraft event was held for young people, to encourage the participation of younger citizens and was a huge success. Demand was very high for this event and as such, a second event will take place in July. Links to these workshops were advertised on the Development Plan website and the Council's social media channels and in local libraries.

The participants were asked to come up with design solutions for the future of the Rogerstown Estuary area. Their brief was to focus on re-imagined green spaces and public parks, street design including bike paths and footpaths, biodiversity and bird-watching parks, or public buildings such as schools and community facilities or consider the redesign of the route from home to school for children living in the area.

The workshop was a success with the participants providing very impressive creative design ideas, bringing together ecological and social values and proposing different combinations of contemplative and active functions for the area.



Image 9: Minecraft poster



Image 10: Fingal Minecraft

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- **Outdoor advertisements**

Posters advertising the preparation of the Development Plan were placed at bus stops at a number of locations throughout the County.



Image 11: Bus shelter/stop advertisement

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STRATEGIC POLICY CONTEXT

Since the adoption of the Fingal Development Plan 2017-2023, a number of new policy documents have been issued for land use planning and development in Ireland. This section provides a general overview on key policies at a National and Regional level which will inform the preparation of the Fingal Development Plan 2023-2029.

In terms of the national hierarchy of spatial plans, the overarching plan is the National Planning Framework (NPF) with the Regional Spatial and Economic Strategy (RSES) then setting out the regional framework and mechanism for implementation and delivery of the NPF.

The RSES also includes the Dublin Metropolitan Area Strategic Plan (MASP) which sets out the growth strategy for the Greater Dublin Area (GDA). Individual County Development Plans set out an overall strategy at local level and these Plans must be consistent with both the NPF and the RSES. Fingal is identified in the RSES within the Dublin Region and partly within the MASP area. The area outside the MASP boundary is known as the Core Region.

The Development Plan sits within a hierarchy of plans and is required to have a Core Strategy which will show that the objectives within the Development Plan are consistent with the objectives set out in National and Regional Strategies.

Project Ireland 2040 - National Planning Framework and the National Development Plan 2018 - 2027

Project Ireland 2040 is the Government's overarching policy initiative for the Country, and it is made up of the National Planning Framework (NPF) to 2040, and the National Development Plan (NDP), 2018 - 2027.

National Development Plan 2018 – 2027

The National Development Plan 2018 - 2027 (NDP) sets out the investment priorities that will underpin the implementation of the National Planning Framework, through a total investment of approximately €116 billion. This level of capital spending will ensure ongoing employment maintenance and creation with appropriate regional development. It will also provide clarity to the construction sector, allowing the industry to provide the capacity and capability required to deliver Government's long-term investment plans. The Department of Public Expenditure and Reform recently invited submissions to a review of the NDP, in light of the recent Covid-19 pandemic and an evolving policy context. This review of the NDP provides an opportunity to ensure alignment between the NDP and the priorities identified in the Programme for Government including climate action, housing policy and transport policy.

Ireland 2040 Our Plan -The National Planning Framework

The National Planning Framework (NPF) is the Government's high-level strategic vision for shaping future growth and development in the entire country over a 20-year period. The vision, as set out in the NPF, is to be delivered by way of a regionally focused strategy for managing growth and linking this growth to the NDP, to provide a counterbalance to the established concentration of growth in the Greater Dublin Area. The NPF sets out a targeted pattern of growth for the Eastern and Midland Region and Dublin City and these growth figures inform the delivery of national policy expressed in the NPF and the delivery of the RSES. The NPF identifies ten National Strategic Outcomes (NSOs) for the future growth and sustainable development of Ireland to 2040 which will be a central consideration in shaping the new Fingal Development Plan.

The NPF has a very clear focus on achieving compact growth and, more specifically, brownfield infill development which translates into encouraging more people, jobs and activity generally within existing built up areas rather than into new greenfield areas (National Policy Objective (NPO) 3b). This growth strategy will

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allow better use of underutilised serviced land and buildings, including infill and brownfield land, with more high-quality and high-density mixed-use development accompanied by enhanced amenities, education, health and social services, all supported by sustainable mobility.

The NPF acknowledges the significant contribution that rural areas make to Ireland's identity and to overall national development in economic, social, cultural and environmental terms. The NPF places a major focus on rural areas in relation to strengthening Ireland's rural fabric and supporting existing communities, planning for the future growth and development of rural areas, supporting job creation, addressing connectivity gaps and better co-ordination of existing investment programmes dealing with social inclusion, rural development and town and village renewal.

Regional Spatial and Economic Strategy 2019 – 2031

The Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly area sets out a strategic plan and investment framework to shape development and manage planning in the Region. The RSES translates the NPF objectives and the growth and settlement strategy at the regional level, ensuring coordination between the NPF and each County Development Plan.

The RSES identifies the region's challenges as the need to sustain economic growth whilst transitioning to a low carbon society and the requirement to align population growth with the location of homes and jobs whilst creating healthy attractive places and an enhanced quality of life. The RSES is underpinned by three cross-cutting principles; healthy placemaking, climate action and economic opportunity, which will be incorporated into all facets of our new Development Plan.

The growth strategy for the Region supports the continued sustainable growth of Dublin and its transition to a low carbon, climate resilient and environmentally sensitive region in accordance with the Metropolitan Area Strategic Plan (MASP), which forms part of the RSES.

The MASP directs future growth to identified strategic residential and employment corridors based on their current and future development capacity, their ability to deliver outcomes such as compact development, place making, accessibility to public transport, potential for economic development and a reduced carbon footprint.

The RSES recognises the strategic location of Swords, in proximity to Dublin City, Dublin Airport, the national road network and planned MetroLink and it is specifically identified as one of three 'Key Towns' in the MASP area. These Key Metropolitan Towns have the capacity and future potential to accommodate above average growth in the Region with the requisite investment in employment creation, services, amenities and sustainable transport. Specific Regional Policy Objectives (RPO's) are outlined for Swords.

Also relevant to Fingal is the 'MetroLink – LUAS Corridor' linking Swords and Dublin Airport to Dublin City and the 'Dublin – Belfast Economic Corridor' which is identified as another strategic connection. This Corridor is the largest economic agglomeration on the island of Ireland, with the cities and towns along the Dublin – Belfast Economic Corridor home to a population of around 2 million people.

The Metropolitan Area Strategy identifies Strategic Development Areas in Fingal;

- **Employment:**
Dublin Enterprise Zone, Swords and Dublin Airport/South Fingal and Lissenhall.
- **Residential:**
Baldoyle-Stapolin, Donabate, Dublin 15 lands (Hansfield, Barnhill & Kellystown), Swords (Oldtown & Mooretown) Lissenhall and Dunsink.

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DRAFT CORE STRATEGY

The Planning and Development (Amendment) Act 2010 introduced the requirement for an evidence based 'Core Strategy' to be included in all County Development Plans. The key purpose of the Core Strategy is to ensure that an appropriate amount of land is reserved in the right locations to meet housing and population targets. This is done through the articulation of a medium to long term quantitative strategy for the spatial development of the area which must be consistent with National and Regional policy objectives set out in the NPF and RSES for the mid-east region.

In essence, the Core Strategy must ensure that an appropriate quantum of zoned land is available and provided at the right locations within the County to ensure new homes can be built with supporting services and facilities provided to serve them. In effect, the Core Strategy forms the basis for all development within the County extending from higher order plans such as the Development Plan through to Local Area Plans and Urban Framework Plans.

Section 11 (4) (d) of the Planning and Development Act 2000 (as amended) provides that following the consideration of the Chief Executive's Report on submissions for the Pre-Draft consultation stage, that the members of the Planning Authority may issue directions to the Chief Executive regarding the preparation of the Draft Development Plan. The legislation provides that any such directions shall be strategic in nature, consistent with the Draft Core Strategy, and shall take account of the statutory obligations of the Local Authority and any relevant policies or objectives for the time scale of the Government, or of any Minister of the Government. In accordance with this statutory requirement, an indicative and 'strategic' level Draft Core Strategy is set out below, in order to ensure that 'strategic' directions issued by members may be consistent with National and Regional policy.

The National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES), which includes the Metropolitan Area Strategic Plan (MASP), are key determinants for the Core Strategy. The NPF has a clear focus on achieving what is called brownfield/infill development, which translates into encouraging more people, jobs and activity generally within the existing built up areas. In line with this focus on compact growth, it is a target of the NPF that half of future national population growth will be focused in the existing five Cities and their suburbs, National Planning Objective (NPO) 2a, and furthermore, that at least half of all new homes, that are targeted in the five Cities, will be within their existing built-up footprints. The County Development Plan Core Strategy will focus future development in a manner that delivers the national compact growth agenda.

The NPF introduces a new requirement for a two-tier approach to land zoning. Tier 1 lands are serviced, and in general, part of or contiguous to the built-up footprint of an area. Tier 2 lands are not currently sufficiently serviced to support new development but have potential to become fully serviced within the lifetime of the County Development Plan. Tier 2 lands may be positioned within the existing built-up footprint, or contiguous to existing developed lands or to Tier 1 zoned lands. The NPF requires that the County Development Plan must carry out an infrastructural assessment of the required services to support new development on any Tier 2 lands, and the assessment must be aligned with the delivery program of infrastructural providers such as Irish Water and the National Transport Authority. The NPF states that lands that cannot be serviced during the lifetime of the County Development Plan should not be zoned for development. The Draft Plan will include a more detailed assessment of enabling infrastructure requirements.

The RSES sets out a settlement hierarchy for the Region and identifies key growth areas which will see significant development up to 2031 and beyond. Local Authorities are required to determine the County level hierarchy of settlements in accordance with the RSES settlement hierarchy. The Table below sets out the RSES settlement hierarchy as it applies to Fingal and agreed in Variation no. 2 of the current Plan, which aligned the Plan with the NPF and the RSES.

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Settlement Typology	Description	Metropolitan	Core Region
Dublin City and Suburbs	International business core with a highly concentrated and diversified employment base and higher order retail, arts, culture and leisure offer. Acts as national transport hub with strong inter and intra-regional connections and an extensive commuter catchment.	Majority of Fingal's urban footprint.	
Regional Growth Centres	Regional Growth Centres are large towns with a high level of self-sustaining employment and services that act as regional economic drivers and play a significant role for a wide catchment area.	Not applicable	
Key Towns	Large economically active service and/or county towns that provide employment for their surrounding areas and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres	Swords	
(i) Self-Sustaining Growth Towns	(i) Self-Sustaining Growth Towns with a moderate level of jobs and services – includes sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining.	Donabate	
(ii) Self-Sustaining Towns	(ii) Self-Sustaining Towns 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.	Malahide	Balbriggan Rush Lusk Skerries
Towns and villages	Towns and villages with local service and employment functions	Kinsale, Rivermeade, Coolquay, Rowlestown, Portrane.	Balrothery Loughshinny Ballyboghil Naul Balscadden Oldtown Garristown Ballymadun
Rural	Villages and the wider rural region		Rural Fingal and Rural Clusters

Table 4: Fingal Settlement Hierarchy

The Core Strategy in the Draft Plan will align with the NPF, including the Implementation Roadmap 2018 and the RSES, including the MASP. The roadmap provides transitional regional and County population projections to 2031.

The NPF has envisaged that EMRA will grow by 490,000-540,000 persons by the year 2040. In line with this, the RSES has a projected target growth for Fingal of 340,000 (low) and 369,000 (high). This includes the MASP allocation of an additional 20,000 persons for Swords, as per NPO 68, which allows up to 20% of the phased population growth targeted in the principal city and suburban area, to be accommodated in the wider metropolitan area. EMRA has allocated the additional growth to the three Metropolitan Key Towns in the MASP namely Bray, Maynooth and Swords. This is based on the premise that Swords for example, can demonstrate compact growth on high capacity planned or existing public transport corridors.

Area	Population 2016	Projected population 2026	Projected population 2031
Fingal	296,020	327,000-333,000	340,000-369,000

Table 5: Population Projections for Fingal: Source: NPF & EMRA

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The Draft Core Strategy of the Draft Plan will have a focus on the delivery of identified Strategic Development Areas in the MASP while retaining flexibility to provide for ongoing opportunities for increased densities, reduced vacancy and re-use of underutilised lands within existing built-up areas. The Draft Plan will include a Core Strategy Map, the contents of which will be guided by the statutory requirements of Section 10 (2) of the Planning and Development Act, 2000 (as amended).

The Council recognises the principles of sustainable growth embodied in the NPF and RSES and the need to secure more compact urban development patterns with specific targets for the delivery of new homes on infill and brownfield sites within existing urban areas. In preparation for the Draft Plan and Draft Core Strategy, FCC has appointed consultants to carry out an Urban Capacity Study. This will provide accurate baseline data to inform future policies and objectives, particularly the manner in which the growth of Fingal's settlements will align with National and Regional planning objectives for compact sustainable growth and enhanced resilience.

In line with the NPF and the RSES, FCC will undertake a Housing Need and Demand Assessment (HNDA). The results of the HNDA will inform the policies and objectives of the new Development Plan in such areas as housing location, tenure, mix of housing and typologies (apartments, sheltered housing, housing for the elderly etc). This in turn will help to inform the provision of sufficient land supply to meet housing demand going forward. The publication of the recent Section 28 Planning Guidelines on Housing Supply Methodology for Development Plans will also assist in the preparation of the Housing Strategy and the Core Strategy for the new Plan.

The Draft Core Strategy will also consider the ESRI report Structural Housing Demand at County Level (2020), which provides a robust, up-to-date and independently developed housing demand projection. This will help inform policy and investment with regard to housing during the new Development Plan period. The ESRI work is particularly important, as it provides an integrated model of housing demand that takes into account demographic, economic and housing market factors, including inter-county migration and will assist in informing the development of the new Core Strategy.

The Draft Core Strategy will form the basis for all development within the County through evidence-based analysis of population projections, land availability, infrastructure and services, and upcoming transportation planning. The Draft Core Strategy will be formulated in line with the preparation of the Draft Development Plan and will align with the population targets and policy objectives outlined in the NFP, RSES and the MASP.

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EXECUTIVE SUMMARY OF ISSUES RAISED

People and Place

Submissions received with regard to the Strategic Issues Paper identify the unique characteristics, historic qualities and sense of place associated with Fingal's settlements. Whilst acknowledging population growth and the resultant need for consolidated development, enhanced sustainability, inclusivity and resilience, submissions called for a holistic approach to such expansion, with the views of stakeholders, young and old to be incorporated, the simultaneous provision of social and community infrastructure, the need to underpin with climate action objectives and ensure the preservation of Fingal's unique sense of place and local identity. A significant number of submissions called for greater housing choice and mix of typologies and tenures to create a range of lifestyle and lifespan choices in housing provision.

A significant thread which permeates many submissions relates to the aftermath of the Covid-19 pandemic and the need to re-evaluate our public realms, outdoor spaces and recreational amenities. This included submissions requesting additional facilities and resources to support the enjoyment of Fingal's parks, playgrounds, recreational facilities and coastal resources while ensuring universal access to the public realm for all.

Many submissions support and recognise that settlement densification, including compact growth, builds strong identity, increases viability and economies of scale in infrastructural investment and provides alternatives to unsustainable travel patterns. Multiple submissions highlighted the need to ensure that such an approach is balanced by high standards of development, successful healthy placemaking, the integration of established and new communities, provision of public open spaces and recreational amenities and assurance that the needs of existing settlements are not overlooked.

Submissions request that the UN Sustainable Development Goals form a core part of and constitute the driving force behind the Development Plan.

The importance of plan-led development in creating healthy and sustainable settlements within Fingal was raised in numerous submissions together with the need to ensure that the forthcoming Development Plan comprise an evidence-based approach to land-use zoning and settlement strategy as set out in legislation and national and regional planning guidance. The importance of promoting the vibrancy of town and village centres, safeguarding Fingal's rural communities and adopting a 'Town Centre First' approach were also raised as key considerations in the submissions received.

Climate Action

There is broad support for the adoption of a range of actions to address the pressing issue of climate change. Submissions called for the alignment of the Draft Plan with European, National, and Regional policy with respect to climate action, but also sought bespoke policies and objectives for Fingal relating to the importance of transitioning to a low carbon, climate resilient economy and society. FCC taking an educational/leadership role in how we deal with climate change was also to the fore. A move away from fossil fuels and towards renewable energy was highlighted as well as a modal shift from the private car towards more sustainable forms of transport, such as sustainable, suitably located public transport and active travel (walking and cycling). Issues around coastal management, flood defence, tree planting and protecting our heritage resources from the impacts of climate change were also highlighted in a significant amount of submissions received.

Connectivity and Movement

The submissions highlight the importance of progressing modal shift to sustainable transport modes such as walking, cycling and public transport as alternatives to the private car, consolidating urban generated development through compact growth and the integration of spatial land use and transport planning.

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Improving accessibility and connectivity to key destinations and to rural areas within the County through improved public transport provision is required. In this regard, supportive policies must be provided in the new Plan to support and facilitate the timely delivery of key enabling infrastructure projects such as MetroLink, BusConnects, DART+ and LUAS Expansion. The protection of strategic air and road corridors within Fingal are considered critical for the future prosperity of Fingal and the wider Dublin and mid-east region.

Many of the submissions outline support for the provision of high-quality, fully connected pedestrian and cycling facilities to encourage more active mobility across the County as well as improving the attractiveness of the public realm for walking and cycling. To influence travel choices and create a change in travel behaviours to more sustainable modes, measures such as controlled parking management, demand management measures, mobility management plans for new developments and behavioural change programmes as well as initiatives for safe travel to school by active modes are suggested. The increase in electric vehicles usage, personal mobility modes and EV charging infrastructure are seen as key to providing more sustainable modes of transport within the County. The application of the universal design approach and accessibility for all are regarded as key considerations in the planning and development of mobility schemes. Submissions identified a number of specific areas within the County where improved roads infrastructure, greater traffic management and enforcement matters could be implemented to alleviate traffic congestion.

Employment, Economy and Dublin Airport

The importance of supporting local businesses was highlighted in many of the submissions and the need to regenerate and revitalize our town and villages centers was also a common theme. This related also to requests to provide high quality public realm spaces for markets, festivals and meeting points. Numerous submissions called for the creation and facilitation of work hubs, digital hubs, co-working spaces and enterprise centres throughout the County. A number of submissions called for the creation of increased employment for young people, older people and people with physical and mental disabilities. Submissions also called for the development of renewable energy projects, in particular in off-shore wind with the potential to provide considerable employment opportunities.

The importance of the Dublin-Belfast Economic Corridor, Dublin Airport, Dublin Port, MetroLink and high-quality public transport and road infrastructure is referenced in the submissions regarding the economic development and growth of the County. The importance of clustering and the need to provide resilient commercial zones which can compete with those in Dublin City Centre was also raised in the submissions.

The submissions called for the re-intensification of existing business locations, support for the regeneration of underutilised brownfield sites and support for compact, urban growth that allows for higher density development. The need to align public transport, housing and employment strategies to ensure there is adequate transport links between high-density employment areas and high-density housing areas is called for in submissions received. Several submissions have called for a review to be carried out of the existing business/industrial parks in the County. The submissions request the provision of a sufficient quantum of appropriately zoned lands to facilitate enterprise opportunities, higher order uses and employment creation and to ensure that such lands are logically and coherently located to maximise existing and planned infrastructure. Some submissions noted the growing demand for logistics, warehousing and data centres and others called for a review of use classes within zonings GE - General Employment and FP - Food Park.

The importance of Dublin Airport and the need for its protection is highlighted in submissions, but there are also submissions relating to the impact of the Airport on the surrounding communities/residents of Fingal. The tourism potential of Fingal was highlighted in many of the submissions received. The importance of heritage, including multi-cultural heritage and cultural sites in the County is highlighted. Providing appropriate facilities

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in towns/villages and rural areas to promote and encourage tourism was a recurring theme. The link between tourism and economic development was raised in many of the submissions.

With regard to the economic development of rural areas, submissions highlighted the need for an emphasis on revitalising rural communities and attracting remote workers to rural communities. The promotion of regenerative farming, forestry, local and organic food production and consumption as well as 'farm to fork' initiatives are highlighted in the submissions. The need to encourage and facilitate the sensitive re-use of vernacular houses or farm buildings for farm diversification, agri-tourism and rural development, including self-catering accommodation, arts or craft workshops and small-scale manufacturing is also suggested.

Regarding retail, a recurring theme was the need to rejuvenate and reimagine town centres so that they can respond to the trends that have developed as a result of Covid-19. The importance of local retailing and support for same has also been raised, particularly in the context of the significant growth of local retail over the last twelve months. It is suggested that supporting outdoor seating, outdoors markets and the use of the public realm should become a positive legacy of the crisis. Submissions suggest that the current retail policy is out of date and out of sync with the shift to online shopping and it is highlighted that Retail Strategies need to be flexible, ambitious and cutting-edge to respond to current challenges in a post-Covid-19 environment.

Cultural Heritage

Overall, the submissions received were supportive of the protection of the cultural heritage of Fingal with many looking for increased protection and promotion of sites and structures. Likewise, there were requests for more sites/structures to be designated but also seeking improved implementation of legislative provisions to safeguard existing designated sites to address vacancy, dereliction and encourage heritage-led regeneration. Heritage interpretation and expansion of the tourism potential of Fingal's cultural heritage was raised in a number of submissions. Increased use and promotion of the Irish language was also highlighted along with the need to further support and develop art and cultural events, festivals and centres. There was an over-arching submission to retain and enhance relevant heritage objectives in the current Plan, with focussed deliverable objectives and to ensure that the significance and protection of heritage assets, creativity and culture is interwoven throughout the Plan.

Green Infrastructure & Natural Heritage

The submissions received strongly support the Council's approach to green infrastructure and natural heritage. A number of submissions sought a further strengthening of the policies in relation to green infrastructure and natural heritage and emphasised the need for the development management process to deliver a range of green infrastructure and biodiversity benefits. There was a focus on the provision of connecting greenways, including along waterways. Many submissions raised issues relating to natural heritage including biodiversity and coastal protection. The need to protect designated sites such as Howth SAAO, and undesignated sites was raised with particular emphasis on the need to protect trees, hedgerows, rivers, together with their corridors and Fingal's coastline. There were numerous submissions for greater community involvement in biodiversity protection and support for the provision of accessible information to highlight the significance of natural heritage in the County.

Infrastructure and Utilities

Several submissions received related to the theme of foul water/ wastewater infrastructure and focused on infrastructural capacity issues and related environmental concerns, with many calling for the Council to work in partnership with strategic infrastructure providers such as Irish Water, to ensure that infrastructural projects are progressed. Many submissions focussed on the issue of localised flooding and sought to better

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manage our vulnerability to flood risks arising from climate change by using more innovative, nature-based and community-focused solutions. The OPW requested that the Development Plan accord with the Section 28 Guidelines on Flood Risk and set out specific criteria for the Council to consider.

The importance of supporting key water supply infrastructure projects to ensure public water safety, quality and resilience was also emphasised, with many submissions encouraging the Council to introduce new policy requirements to encourage greater water conservation. Improved testing of our coastal bathing waters and the need to achieve blue flag status on our beaches was also raised many times. The importance of Sustainable Urban Drainage Systems (SuDS) was highlighted in a number of submissions, to ensure that high quality SuDS designs, reflecting best practice are provided, and submissions noted the need to update policies relating to SuDS and buffer zones and riparian corridors. The importance of the circular economy and sustainability was highlighted in many submissions received and the need to promote the reduction and re-use of water through the procurement and delivery of services was noted.

Waste and litter management emerged as significant themes and there were calls for more sustainable and localised waste management infrastructure and the need for better management of litter and animal fouling of footpaths, parks and beaches. The need for waste management to prioritise recycling and elimination of waste in the first instance was flagged in numerous submissions received. FCC needs to further promote recycling to build on the successes of the recycling and drop centres and provide for greater penalties for littering. Many submissions noted the need for better education on recycling and an education campaign is needed to highlight sustainable food waste management options for homes and businesses. Anti-litter campaigns are also needed.

A number of submissions received related to digital connectivity and the need for FCC to implement the National Broadband Plan. A significant number of submissions referenced the need for remote working hubs and co-working spaces in our towns and villages, particularly post Covid-19. Recent advancements in free public Wi-Fi access in Fingal are commended in many of the submissions received with recommendations that free public Wi-Fi access should continue to be expanded across the County in urban and rural areas. The need for education and access to digital resources is noted in a large majority of submissions received, with many submissions requesting the continued roll out of the Smart Districts to other areas in Fingal.

Submissions made in respect of renewable/alternative energy generation focused on the emergence of new technologies and infrastructures designed to provide more secure and low carbon forms of energy, such as district heating systems supplied by waste energy. A number of observations note that energy infrastructure should focus on renewables and sustainability and that FCC should promote wind /solar power in appropriate locations. The submission from Eirgrid highlights the strategic importance of the national electricity grid and the need for robust policies in the Draft Plan to support the development of a safe, secure and reliable supply of electricity.

A smaller number of submissions were also made in respect to air/ noise pollution and street lighting. The need to ensure that noise, air and water pollution is consistently and constantly monitored throughout Fingal and reported on/managed accordingly was highlighted in many submissions received. Noise associated with the Airport was a key issue in many submissions received.

Other Issues

A number of issues that arose in submissions received fell within the 'Other Issues' category. A large volume of submissions requested rezoning of specific lands and / or the review of existing zoning classifications and the quantum of land zoned under the various zoning categories. Many submissions requested a review of the existing quantum of residentially zoned land and general employment zoned land with a view to increase the

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amount of land zoned or to review the uses permitted under the zoning categories. Other submissions requested that no further land be zoned for development. A number of submissions also made reference to the County's rural housing policy and rural cluster designations, with many submissions requesting amendments to the current HA - High Amenity or GB- Greenbelt zoning classifications, to permit dwellings for local housing need.

Dublin Airport was a key theme in many submissions received with requests to review Public Safety Zones, Noise Zones and runway operations. Specific Development Plan objectives were raised in a number of submissions with many observations referencing Local Area Plans, Urban Framework Plans and other plans that require completion now or seeking their inclusion within the work schedule for the next Development Plan period. Map based objectives were also highlighted in a number of submissions received with some seeking of the removal of existing map-based objectives, whilst other submissions seek the inclusion of new objectives at specific locations. A number of other issues raised related to the need for improved consultation and ongoing communication with local communities, issues surrounding the Development Plan process and development management standards and enforcement matters.

Other submissions raised issues which do not fall within the scope of the Development Plan, including Local Authority staffing, building density guidelines, Governmental reviews of the planning process, the SHD process and investment funds' ability to purchase property, political/election signs, provision of a Library of Things, EU funding, enforcement of bye laws, dog attacks on sheep flocks, animal rights, home completion data, restrictions on the times of deliveries/collections to/from An Post facilities, introduction of a public interest test, anti-social behaviour and provision of services through direct labour.

Environmental Assessment and Strategic Flood Risk Assessment (SFRA)

Several submissions received in relation to Strategic Environmental Assessment (SEA) and Appropriate Assessment provided general advice, comments, and information on legislation and access to information. Several submissions raised issues in relation to protecting European sites, biodiversity, riparian buffer zones and addressing flood management.

A significant number of submissions focussed on the issue of Fingal's vulnerability to flood risks arising from climate change. They sought proactive strategic flood risk management through identification/ protection of floodplains from development, the roll-out of evidence-based flood risk monitoring/ reporting and the deployment of additional flood defences to ensure coastal protection.



Part 2: Summary of Submissions by the Office of the Planning Regulator, the Eastern Midland Regional Assembly and the National Transport Authority, and the Chief Executive's Response & Recommendations

PART 2

OFFICE OF THE PLANNING REGULATOR (THE OFFICE)

SUBMISSION NO. FIN-C377-350

SUMMARY OF ISSUES

Consultation Strategies

The Office commends Fingal County Council on the concise thematic based Issues Paper and for the variety of methods used to inform and engage the public. The brochure was also commended. It is recommended that FCC consider specific innovations targeted at engaging younger people in future consultations.

Core Strategy and Settlement Strategy

The Office supports Fingal County Council's focus on compact growth, regeneration and the promotion of development within strategic development areas and along the strategic economic corridors identified under RSES. It has stated that information contained in the Issues Papers in relation to demographic and socio-economic baseline information, population trends, dependency rates and housing provision and completion figures can contribute to the implementation of an evidence-based approach to the development of the County. It is noted that the Core Strategy must comply with section (2A), (2B) and (2C) of the Planning and Development Act. The National and Regional legislation for making the Core Strategy are outlined and the need for consistency between these documents and the Development Plan is stressed.

With regard to density, it is noted in the submission that the capacity of remaining undeveloped land zoned for residential uses under the current Plan (Development Plan (Table 2.2) appears to be considerable and should be reviewed and prioritised to align with growth targets setting out a clear strategy for the Plan period and beyond. The sequential development of serviced or serviceable lands in accordance with the tiered approach to zoning must be prioritised. Close consultation with EMRA is advised in this regard.

Fingal County Council should note that in addition to applying the Housing Supply Target Methodology for Development Planning Guidelines for Planning Authorities (DHLGH, 2020), the population growth parameters of the NPF, the NPF Implementation Roadmap and the RSES continue to apply in tandem. The Office has stated that a preliminary review of the said methodology would seem to indicate that no material adjustments from the ESRI NPF 50:50 scenario are likely to be required for Fingal.

Implementation

The submission highlights that the delivery of enabling infrastructure and key future growth enablers as identified in the NPF, the RSES and MASP are crucial for the practical implementation of the Core Strategy during the Plan period. The Office notes that resolution of water supply and waste water infrastructure capacity issues are critical to facilitate the growth in the City/County, specifically in Strategic Development Areas and Corridors, Capacity Infrastructure and Phasing as indicated in the MASP.

The Office suggests that the scope of any infrastructure assessment study should be sufficiently broad to take account of the full range of enabling infrastructures referred to in the RSES and MASP and should provide clarity in terms of the timeframe for delivery, cost of delivery, identification and availability of funding and the body responsible for implementation in order to provide the certainty required to ensure delivery of the Core Strategy over the Plan period. This in turn will enable Fingal County Council to prioritise relevant land banks with appropriate land activation measures within its control in the near, medium and longer term. Regarding the three strategic development corridors traversing Fingal, the Office recommends that consultation and close collaboration with the neighbouring authorities and infrastructural providers take place, e.g. the fringe area adjacent to the boundary with DCC, between Clonsaugh and Baldoyle.

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Development Approach

The Office has noted that Local Area Plans (LAP's) do not appear to have been prepared for certain towns within Fingal including Swords and Balbriggan. It is advised that the Draft Plan clearly set out its intention to address this issue. The inclusion of a timetable in the Development Plan for the preparation of LAPs would be appropriate.

Regeneration, Compact Growth and Zoning

The submission draws the Council's attention to the guiding principles for infill and brownfield development in Chapter 3 of the RSES including the establishment of a database of brownfield sites and active land management strategies. The Office welcomes the acknowledgement in the Issues Paper of the role of compact growth, consolidation and regeneration will play in the future spatial strategy for Fingal and congratulates the Council on the successful funding application under the Urban Regeneration and Development Fund for two significant projects, 'Sustainable Swords' and 'Our Balbriggan Rejuvenation Plan', which have the potential to act as flagships for regeneration across the County.

Economic Development & Employment

Reference is made in the submission to the critical role that the Dublin-Belfast Economic Corridor and the Metro Economic Corridor will play in driving forward the economic base of the County.

The MASP specifically supports employment generation at strategic locations within the Metropolitan area to strengthen the local employment base and reduce pressure on the Metropolitan transport network, including future employment districts in Swords and Dublin Airport/South Fingal. The Office advises that the scale and nature of development facilitated by the Development Plan within the vicinity of Dublin Airport must avoid undermining the primary role of the facility as international transport infrastructure, or the primary purpose of transport investment to improve access thereto.

The Office has stated that the inclusion of appropriate objectives, policies and mechanisms to assist and secure the development of the strategic economic development locations will be a key element of the Development Plan and co-ordination with other Planning Authorities along these corridors and EMRA is encouraged by the Office.

The Office has advised that the Draft Plan demonstrates an evidence-based approach to the development of a retail strategy which supports the vitality and vibrancy of the City and town centres, and co-ordination with neighbouring authorities in the Greater Dublin Area will also be significant in this regard.

Transport & Infrastructure

The importance of transitioning to low-carbon mobility solutions to mitigate negative impacts through the Development Plan cannot be overstated. It is stated that Fingal is well placed to achieve a favourable shift in transport towards public transport modes and proposed investment in public transport. The OPR advises that Fingal must ensure that development along high-quality transport infrastructure corridors maximises the return on investment through appropriate densities.

The Office recommends that the baseline figures included in the Issues Paper would ideally form the basis against which Fingal would set modal share targets to be achieved by the end of the Plan period. Such targets should be aligned to the promotion of relevant measures to achieve a reduction in GHG emissions and energy use.

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The proposal for an integrated approach to land use transport strategy is commended, in line with the Guiding Principles for the Integration of Land Use and Transport and related RPOs in the RSES. The submission notes that the guiding principles support the implementation of the '10 minute' settlement concept and Fingal County Council is requested to consider the implementation of the 'Avoid-Shift-Improve' framework through the Development Plan. The provision of increased road space for pedestrians and cyclists is welcomed by the Office. The application of the Design Manual for Urban Roads and Streets (2019) will be critical to ensuring streets are designed to give appropriate priority to pedestrians and cyclists and in addition to helping to create healthy places. The facilitation of EV charging points and other innovative approaches is recommended in the submission.

The Office advises Fingal to make appropriate provision to support the delivery and integration of key transport enablers to accommodate city growth over the Plan period and beyond, consistent with the NPF and the RSES, including BusConnects, DART expansion and LUAS extension programmes and MetroLink, while maintaining the capacity and safety of strategic transport networks. In addition, the submission advises that Fingal support the preparation of local transport plans for those settlements identified under the RSES and other such areas in consultation with the NTA and TII, including setting out clear timelines and the relationship with future LAPs.

Cultural Heritage

The Office submission refers to the importance of the protection of culture and heritage amenities, both in their own right, as amenities for the public and as important economic drivers for the County. The submission notes that the need to strike a balance between conservation and development, as recognised in the Issues Paper, will present a significant challenge to be addressed by the Development Plan.

Climate Action

The Office would anticipate that climate action would be a cross-cutting issue across the Development Plan. The submission notes Fingal's work with CARO. The requirement to include objectives for the promotion of sustainable settlement and transport strategies for both urban and rural areas, which include the promotion of measures to reduce energy demand, to reduce GHG emissions and to adapt to climate change through, in particular, the location, layout and design of new development is noted. Climate change adaptation also needs to be considered, and flood risk management is a principle concern in this regard.

Renewable Energy

Reference is made to the NPF, the RSES and The Climate Action Plan 2019 in the submission. The OPR has stated that it is unclear if key documents, including an up to date Wind Energy Strategy (current WES dates from 2009), or a Local Authority Renewable Energy Strategy (Objective EN05 of existing Plan refers) have been prepared. These strategies would inform the implementation of renewable energy projects, including wind energy, within the County.

The Office submission has referenced Circular Letter PL 5/2017 – Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change and Wind Energy Development Guidelines 2006 – Update on Review (July 2017) and has stated that the Development Plan will be required to implement SPPR 1 of these Guidelines.

Flood Risk Management

The Office advises the Council to consult with the OPW at the earliest opportunity to ensure the approach is consistent with that required under The Planning System and Flood Risk Management Guidelines for Planning

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Authorities (DEHLG & OPW, November 2009) as clarified by Circular PL 2/2014. The impact of climate change on flooding needs to be considered. The OPR encourages FCC to demarcate the flood zones A and B on land use zoning maps in the Plan in order to provide greater transparency and certainty in relation to flood risk management.

CHIEF EXECUTIVE'S RESPONSE

Consultation Strategies

The comments made by the Office in relation to public consultation and engagement are welcomed. A number of public engagement measures were utilised to promote the Development Plan review. These included the production of a Strategic Issues Paper document, which was available to download and view/purchase at FCC offices. A promotional video was available to view on Fingal's website and on the Consult Fingal Portal. A Strategic Issues Paper Brochure was delivered to all homes in the Fingal area.

A Minecraft event was held for young people, which was a huge success. Demand was very high for this event and as such a second event will take place in July.

A communications strategy was adopted to ensure awareness of the Development Plan review process spread through the County and beyond. Central to this was the social media campaign. Traditional advertising avenues such as billboards, bus stops, local media and radio were also used.

In addition, four webinars were held over a two-week period between 7-8pm to reach as wide an audience as possible. These webinars dealt with each of the themes outlined in the Strategic Issues Paper. These webinars were recorded and are available to view on Fingal website.

There were 551 no. submission received from the public during the Pre-Draft public consultation stage. This was an increase of 226 no. submissions from the same stage of the Plan making process for the current Development Plan in 2015.

Core Strategy and Settlement Strategy and Implementation

The Draft Plan will provide measures and objectives to promote compact growth and regeneration, revitalising our towns and villages and promoting economic growth in the aforementioned and within the strategic development areas and corridors identified in Fingal in the RSES. The Council has commissioned an Urban Capacity Study which will be carried out to inform plan preparation, assist in identifying correlations between development sites and infrastructure provision and will inform policy formulation in the Draft Plan. The Plan will include appropriate policies and objectives to promote a compact urban form and including higher densities and will identify locations of brownfield sites and regeneration.

The evidence-based approach to the planned development of the County will be central in the preparation of the Draft Plan. It is acknowledged that the Core Strategy must comply with Section (2A), (2B) and (2C) of the Planning and Development Act 2000, (as amended) the NPF, the RSES, the MASP and any Ministerial guidelines issued under Section 28 of the Act.

The remaining undeveloped land zoned for residential uses in the current Development Plan will be reviewed in the Draft Plan and priority will be given to the sequential development of serviced or serviceable lands in accordance with the tiered approach to zoning outlined in the NPF, the RSES and MASP. The infrastructure priorities detailed in the RSES are noted and FCC will continue to engage with Irish Water in this regard. The

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Draft Plan will identify key infrastructure to be developed over the lifetime of the Plan. The strategic landbank at Dunsink for example is currently the subject of a feasibility study to ascertain its suitability for future zoning and development. FCC will continue to engage with the neighbouring Local Authorities with regard to the development of the strategic development corridors that traverse the County boundaries.

Development Approach

FCC has employed a number of policy responses as part of our overall development approach, namely the adoption of LAP's and Masterplans across the County. 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.

Proactive active land measures such as provision of LAP's and Masterplans across the County will continue to be part of the development approach and areas where they are required will be outlined in the Draft Plan.

Economic Development & Employment

The economic strategy for Fingal must balance the unprecedented events and economic impacts of the past year with an expectation that the economy will recover to some extent in a return to some type of normality in the long-term. The new Plan faces the challenge of responding proactively to these circumstances, while also providing for built in resilience and sustainability. The Draft Plan will be guided by the growth enablers and policies outlined in the RSES and will strive towards achieving growth that is sustainable, competitive, inclusive and resilient.

The Draft Plan will focus on the areas identified in the MASP for strategic employment development and the caution raised by the Office regarding development in the vicinity of Dublin Airport is noted.

The economic principles outlined in the RSES are acknowledged and the Draft Plan will include appropriate policies, objectives and mechanisms to assist and secure the development of the strategic employment development locations in accordance with these principles. It is considered that consultation with EMRA and neighbouring authorities will take place where required.

The Retail Strategy for the Greater Dublin Area 2008 was prepared by the Dublin and the Mid-East Regional Authorities (now dissolved). The retail hierarchy as expressed in the GDA strategy is substantially reflected in current City and County Development Plans and is presented in the RSES. The RSES outlines that EMRA will support and drive the preparation of a new retail strategy for the Region under the requirements of the Retail Planning Guidelines for Planning Authorities 2012, or any subsequent update, to update this hierarchy and apply floorspace requirements for the Region. The Draft Plan will support this approach and work with EMRA regarding same.

Transport & Infrastructure

The Draft Plan will continue to facilitate the move to low carbon mobility and active travel solutions, by providing the appropriate transport infrastructure to provide an alternative to the private car. FCC will continue to work with the NTA and TII regarding the delivery and integration of key transport enablers to accommodate growth and the Draft Plan will be consistent with the NTA Transport Strategy for the GDA. The Draft Plan will be a mechanism for the promotion of more effective and sustainable travel options and the provision of increased road space for cyclists and pedestrians will continue to a major objective of the Draft Plan.

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The Guiding Principles for the Integration of Land Use and Transport, as detailed in the RSES, will be a guiding tool in the preparation of the Draft Plan and consideration will be given to the implementation of the Avoid-Shift-Improve framework.

The Draft Plan will consist of appropriate policies, objectives and development management standards that will ensure that development along high-quality transport infrastructure corridors is consistent with Section 28 Guidelines and the RSES guiding principles for the integration of land use and transport.

It is acknowledged that the RSES has identified Balbriggan and certain large settlements or development areas within the Dublin Metropolitan Area as areas where Local Transport Plans must be prepared. FCC will consult with the NTA and TII in relation to same.

Cultural Heritage

It is acknowledged that there is an ongoing challenge to facilitate development while protecting the cultural heritage of the County. It is imperative therefore that the Draft Plan contains appropriate policies and objectives to ensure that a balance can be created and that the heritage of the County can be enjoyed by all.

Climate action

Fingal's commitment to transitioning to a low carbon society and economy is evidenced by its preparation of the FCC Climate Change Action Plan 2019-2024 and climate action will be a cross cutting theme in the new Plan. The Draft Plan will include the applicable policies, objectives and development management standards to ensure the provision of well-serviced neighbourhoods that will ensure permeability and an attractive walking and cycling environment which will reduce reliance on cars and 'help' climate change. The importance of climate change adaptation is noted and a Strategic Flood Risk Assessment will be carried out in consultation with the OPW and will accompany the Draft Plan.

Renewable Energy

The drafting of a Local Authority Renewable Energy Strategy (LARES) will be prepared by FCC. The LARES will promote the use of renewables throughout the County. The new Plan will support renewable energy projects through the inclusion of appropriate policies and objectives, while also having regard to relevant National and Regional policy for both on-shore and off-shore renewable energy. A draft Wind Energy Strategy is in place and the next Plan and the policies and objectives within, will support a Renewable Energy Strategy document.

The need for the implementation of the renewable energy projects is noted and FCC will continue to lead in renewable energy uptake and energy efficiency through retrofits of its buildings and social housing stock. The interim guidelines are acknowledged and will be considered in the Draft Plan.

Flood Risk Management

A Strategic Flood Risk Assessment will accompany the Draft Plan and consultation will take place with the OPW to ensure compliance with the Planning System and Flood Risk Management Guidelines for Planning Authorities and Circular PL2/2014. Climate change will be considered as part of the SFRA.

CHIEF EXECUTIVE'S RECOMMENDATIONS

- Prepare a Draft Development Plan that complies with the provisions set out under Section 10(2)(A) of the Planning and Development Act 2000 (as amended), including Section 28 Guidelines and consistent with the NPF, the RSES and associated MASP.

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- Prepare an evidence-based Core Strategy, Housing Strategy (including HNDA) and Settlement Hierarchy in line with the requirements of the Planning and Development Act 2000 (as amended) that is consistent with the objectives of the NPF, RSES and the MASP and relevant Section 28 guidelines.
- Continue to develop a strategic approach to town centre regeneration through the Town Centre First Approach and by utilising existing buildings and unused lands for new development, promote residential occupancy in our rural towns and villages and provide for a mix of uses within these areas, including cultural and community uses and residential uses, as appropriate.
- Incorporate climate action as an overarching and cross-cutting theme across the Draft Plan in line with policies and objectives contained in the NPF, the RSES, FCC's Climate Change Action Plan 2019-2024 and national legislation.
- Support Renewable Energy projects through the inclusion of appropriate policies & objectives, while also having regard to relevant national and regional policy for both on shore and off shore renewable energy.
- Ensure a sequential and precautionary approach to flood risk management in line with the requirements of the Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009).
- Identify and support the provision of key enabling infrastructure at strategic development sites in Fingal County, as outlined in the MASP, to facilitate their release for development during the lifetime of the Development Plan.
- Consult with all relevant public service providers to ensure that zoned lands are serviced in a timely fashion to facilitate opportunities for employment, enterprise creation and residential development.
- Support the economic development of Fingal in line with the policies and objectives stipulated in the National Planning Framework and the Regional Spatial and Economic Strategy and utilise active land measures such as provision of LAP's and masterplans across the County as part of the development approach for Strategic Development Areas and Corridors.
- 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.
- Promote the sequential development of serviced of serviceable lands in accordance with the tiered approach to land zoning outlined in the NPF, the RSES and MASP and ensure co-ordination with other neighbouring planning authorities where strategic development corridors traverse county boundaries.
- Promote enterprise and employment throughout the County, including along the Dublin Belfast Economic Corridor, the Metro Economic Corridor, Swords, Blanchardstown and Balbriggan and work with the other Dublin Local Authorities to promote Fingal and the wider Dublin and mid-eastern region as an engine for economic growth.
- Promote sustainable settlement and transport strategies within the county and identify measures, including targets for modal shift, to reduce energy use, GHG emissions and adaptation to climate change.
- Continue to support Dublin Airport as a key national asset to Ireland's economic success by ensuring appropriate policies and objectives are contained in relation to same in the Draft Plan, which will align with Dublin Airport Local Area Plan 2020.

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- Promote modal shift to public transport, walking and cycling, encouraging permeability and taking account of national and regional policy and guidance, while supporting an efficient and effective transport system.
- Support SMARTER Travel initiatives and ensure that the Draft Plan aligns with the NTA's Transport Strategy for the Greater Dublin Area 2016-2035.
- Support the delivery and integration of key transport enablers to accommodate growth over the plan period and beyond, consistent with the NPF and the RSES, including BusConnects, DART expansion, LUAS extension programmes and MetroLink, while maintaining the capacity and safety of strategic transport networks.
- Seek to implement the provision of the Design Manual for Urban Roads and Streets (2019) in relation to the delivery of safe streets and overall best practice design and promote the principle of filtered permeability.
- Support and reinforce the retail hierarchy within the county having regard to the RSES, or any superseding regional retail strategy, and explore the opportunity to strengthen the retail function in Fingal's towns and villages.
- Support the promotion, protection and perseverance of the county's the unique cultural heritage of the county.
- Promote the relevant measures to achieve a reduction in GHG emissions and energy use.

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EASTERN AND MIDLAND REGIONAL ASSEMBLY (EMRA)

SUBMISSION NO. FIN-C377-47

SUMMARY OF ISSUES

General Overview

The submission provides a general background to the purpose of the RSES including legislative context and welcomes the comprehensive content of the Strategic Issues Papers highlighting the requirement for the Draft Plan to be consistent with the RSES and the NPF, ensuring alignment with Local Regional and National planning policy. The submission also draws attention to key areas and the RPOs of the RSES as well as the NSOs of the NPF which should inform the Draft Plan. A number of key areas to inform the Draft Plan are highlighted as follows.

Vision and Strategic Outcomes

The submission notes that in determining the overall vision in the Draft Plan, the Council consider the Vision, Key Principles and RSOs as set out in Chapter 2 of the RSES. It is further noted that the RSOs are aligned with the NSOs of the NPF and the ability to demonstrate their delivery may potentially be linked to future funding sources. The three Key Principles underpinning the RSES, Healthy Placemaking, Climate Action and Economic Opportunity are highlighted.

Growth Strategy of the RSES

The submission draws the attention of the Council to Chapter 3 of the RSES which sets out the 'Growth Enablers for the Region' and Chapter 5 which sets out the MASP of the RSES.

Sustainable Compact Growth

The submission draws attention to the guiding principles for infill and brownfield development and to RPO 3.2 of the RSES which requires Local Authorities in their Core Strategies to set out measures to achieve compact growth targets of at least 50% of all new homes within or contiguous to the built up area of Dublin City and suburbs and a target of at least 30% for other urban areas. The submission seeks the identification of regeneration lands in the Core Strategy. Chapter 3 of the RSES and Section 3.2 and relevant RPOs are highlighted in this context. The Council's attention is drawn to the creation of a brownfield data base at the local level and the inclusion of focused active land management in the Development Plan.

Settlement Strategy of the RSES

The submission requests that the Settlement Strategy aligns with the RSES as set out in Chapter 4 and specifically Tables 4.2 and 4.3 which relate to the settlement hierarchy and typologies as well as Chapter 5 related to the MASP. Of relevance to Fingal are the identified SDAs in the 'City Centre within the M50', which identify the long-term development potential of the major strategic landbank of Dunsink, the continued development of Dublin 15 lands at Hansfield, Barnhill and Kellystown on the North-West (Maynooth/DART+ rail line) corridor, and the potential for sequential development of strategic residential sites within Swords and Oldtown-Mooretown on the Metrolink/LUAS Green line Corridor, and the potential to develop a new mixed-use urban district on the northern side of Swords at Lissenhall linked to the delivery of the Metrolink in the medium to long term.

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The Core Strategy of the upcoming Development Plan should have a focus on the delivery of identified SDA's in the MASP while retaining flexibility to provide for ongoing opportunities for increased densities, reduced vacancy and re-use of underutilised lands within existing built-up areas.

National and Regional Population Targets

The submission states that population targets should be applied as set out in the NPF Implementation Roadmap and NPO 68 of the NPF, which allows a reallocation of population to 'Key Towns', one of which is Swords and align with Appendix B of the RSES (SPA and County Population Targets).

It is recommended that the review process be informed by a robust evidence-based approach in formulating the Core Strategy for the County, including demand for single housing in the countryside as set out under NPO 20 of the NPF and as part of the Local Authority's overall Housing Need Demand Assessment (HNDA). The Council's attention is drawn RPO 9.5 where EMRA will support Local Authorities in preparing a HNDA and the submission considers that a consistent methodology approach is applied by the four Dublin Authorities. It is noted that the Section 28 Guidelines on Housing Supply Target Methodology and the transitional population projections methodology in the NPF Implementation Roadmap and Circular FPSO4/2018 relating to the preparation of HNDA will support the preparation of evidence-based housing strategies.

Strategic Issues Papers

The submission provides comments in relation to the 7 no. themes as set out in the Strategic Issues Paper as follows:

People and Place

Submission welcomes the recognition of healthy place-making and highlights the importance of the asset-based approach for the strategic location of development. Section 9.3 of the RSES is specifically referenced in this regard.

• Sustainable Communities

The submission details that the Guiding Principles for Healthy Placemaking set out in the RSES will assist the Council in planning for the provision of recreation and open space facilities and accessible neighbourhoods. RPOs regarding planning for diverse needs as well as support for the Local Economic and Community Plans (LECP) and the Local Community Development Committees (LCDC) are also referenced. Chapters 4, 8 and 9 are referenced in this regard.

The contribution of rural towns, villages and the rural countryside to national and regional development is acknowledged. In this regard, Section 4.8 of the RSES is highlighted in the context of rural regeneration and management of urban generated growth in rural areas under Strong Urban Influence. It is recommended that the Rural Housing Policy for the County aligns with RPOs 4.80 and 4.81 and NPO 19 of the NPF and includes provision for serviced sites in small towns and villages as an alternative to one-off housing in line with RPO 4.78 and NPOs 18a and 18b of the NPF to promote rural regeneration.

• Impact of Covid-19

It is noted that the Draft Plan will need to address both the short-term and anticipated long term impacts of Covid-19 including an accelerated shift towards remote working as well as opportunities to facilitate co-working and remote working spaces and provide for a wider mix of day-time and night-time uses in commercial centres and facilitate the revitalisation of existing towns and villages. Enhanced accessibility and permeability

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in the public realm should also be supported. The recent research undertaken regarding urban centres most exposed to economic disruption caused by Covid-19 is noted for reference at www.emra.ie.

• Housing

Reference is made to RPOs 5.4 and 5.5 which require Local Authorities to provide for higher residential densities and appropriate qualitative standards in line with relevant Ministerial Guidelines. The submission also draws the Council's attention to Section 9.3 Housing and Regeneration and RPOs 9.3-9.9 of the RSES which supports Local Authorities and other relevant agencies in delivering a greater mix of house type and tenure. RPO 4.2 of the RSES promotes collaboration with infrastructure providers to ensure enabling infrastructure investment. Attention is drawn to the MASP Implementation Group forum that assists cross-boundary and cross-sectoral collaboration between key providers and Local Authorities to ensure a steady supply of serviced lands in the Dublin Metropolitan Area is also referenced in this context.

In preparing the Draft Plan, the Council will be required to undertake an assessment of the availability and capacity of future residential and regeneration development lands within the County and to ensure a plan led approach in co-ordinating and developing strategic land banks. It is recommended that consideration is given to the phasing and prioritisation of development lands and that all future land subject to zoning shall undergo an infrastructure and deliverability assessment in line with NPF NPOs 72(a), 72(b) and 72(c) and Appendix 3 of the NPF which sets out a tiered approach to land zoning.

It is recommended that the review of the Plan be informed by an evidence based HNDA which will allow for detailed consideration of housing supply targets and an appropriate mix of accommodation types and tenures, along with the provision of social and affordable and specialist housing as required to meet the needs of current and future populations.

Climate Action

Submission welcomes the focus on climate change and it is acknowledged that the Development Plan will play a key role in the delivery of compact growth and sustainable development to reduce the Council's carbon footprint and address mitigation and adaptation requirements. In this regard, reference is made to a number of sections of the RSES which will inform policy formulation in the Draft Plan with specific reference to Chapters 4,7,8 and 10 of the RSES.

The submission notes the review process offers the opportunity to develop policies to further support modal shift. The attention of the Council is also drawn to the Climate Action and Low Carbon Development (Amendment) Bill. The Draft Plan will be required to include measures to assess and monitor progress on carbon reduction targets in line with RPO 3.6 of the RSES.

Connectivity and Movement

Submission highlights the need for the effective integration of transport and spatial planning and the co-ordination of transport infrastructure investment priorities while maintaining the capacity and safety of strategic transport networks, in order to achieve a shift to sustainable mobility.

Submission highlights the requirement for the Draft Plan to be consistent with the NTA's Transport Strategy for the Greater Dublin Area (under review). Chapter 8 and RPOS 8.1 and 8.4 and Section 8.3 of the RSES are specially referenced in this regard to assist the formulation of Plan policy.

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The submission acknowledges that the sustainable growth of the County requires the provision of planned transport infrastructure, including those planned bus and rail projects set out in Table 8.2 and 8.3 of the RSES and Section 5.6 of MASP, to support future development and improve sustainable travel choices.

The submission highlights RSES support for key targets set out in the Government's Smarter Travel Policy to facilitate modal shift. In this regard, future developments must facilitate sustainable modes of transport with a particular focus on active travel and the NTA Cycle Network. RPOs 5.2, 5.3, 8.7, 8.8 and 8.9 of the RSES are referenced in this regard. The progress made in delivering the NTA Cycle Network within Fingal is noted. Early engagement with relevant transport agencies is recommended to ensure the integration of transport and land use in the Draft Plan including the promotion of behavioural change and demand management measures to help achieve mode shift.

Fingal's engagement with key stakeholders to bring about modal shift in the County is welcomed and the Assembly supports the continued roll out of public realm and active travel interventions in response to Covid-19 which should include provision for universal design and incorporate monitoring measures.

Employment, Economy and Dublin Airport

The submission highlights that economic opportunity is one of the three key principles of the RSES, which is linked to place-making and the promotion of strategic locations for new economic development.

The submission makes reference to Chapter 6 of the RSES 'Economy and Employment' which should be considered in formulating plan policy. In this context, it is specifically recommended that Section 6.5 of the RSES which details specific sectors including retail, tourism, marine, low carbon economy and agriculture and RPO 6.3 – which promotes the Dublin-Belfast Economic Corridor as a key economic driver, RPO 6.23 - low carbon and circular economy and RPOs 6.15-6.18 and 6.8 regarding the role of natural and cultural assets in developing enhanced tourism and leisure experiences should also be considered.

The importance of skills and innovation is also highlighted. Attention is drawn to RPOs 6.25-6.27, research and technology RPO 6.29 and co-working/digital hubs RPO 6.31. Smart city initiatives are promoted under RPO 6.30.

Submission notes that the Fingal Local Economic Community Plan 2016-2020 requires review in light of the adoption of the RSES.

Spatial Distribution of Employment Lands

The identification of strategic employment development areas as part of the Plan review process should be informed by an evidenced based assessment of the location, quantum, density and capacity of any future proposed employment zoned lands. Regard should also be had to the Guiding Principles for the Location of Strategic Employment and Investment Prioritisation (Section 6.3) as set out under the RSES and the MASP as well as Table 5.2 of the MASP which identifies locations for increased employment densities.

Retail

The submission highlights the requirement to comply with the retail hierarchy for the region as set out in Table 6.1 of the RSES and recommends that the Draft Plan include objectives to support placemaking initiatives and town centre renewal in line with RPO's 6.12 – 6.14 of the RSES and the 'Town Centre First' policy in the Programme for Government.

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Submission recognises the need for a new Regional Retail Strategy and that under RPO 6.11 future provision of significant retail development shall be consistent with the Retail Planning Guidelines for Planning Authorities 2012, or any subsequent update and the retail strategy for the region expressed in RSES until such time as this strategy is updated.

Cultural Heritage

The submission emphasises the need for the integration of good heritage management with spatial planning to promote the benefits of heritage led urban regeneration in historic towns as supported in the RSES. The submission also acknowledges the key role that heritage, the arts, language and culture can play in fostering tourism and economic development within Fingal. In the context of the severe impacts of Covid-19 on the arts and culture sector, it is highlighted that the review process provides an opportunity to consider policies to support existing cultural and community spaces, initiatives/events and explore new opportunities for wider community engagement with cultural heritage. In this regard, Section 9.7 and its related RPOs 9.24 to 9.30 relating to the arts, culture, language and heritage should be considered in policy formulation.

Green Infrastructure and Natural Heritage

Submission notes that the guiding principles for Green Infrastructure as set out in Chapter 7 of the RSES as well as the principles for SuDS Drainage under Section 10.2 and Section 9.4 relating to Healthy Placemaking should inform the formulation of plan policy.

Reference is made to ongoing research being carried out to facilitate the integration of ecosystem services into policy and plan making which may inform the integration of Green Infrastructure and Ecosystem Services Mapping in the Draft Plan.

It is noted that there are significant opportunities to further develop a strategic greenway network and that the design of greenways will need to be subject to careful routing and design to ensure the protection of environmentally sensitive sites. Support for the development of improved visitor experiences, nature conservation and sustainable development activities within the Dublin Bay UNESCO Biosphere as set out in the RPO 7.20 of the RSES is also highlighted.

Infrastructure and Utilities

The submission welcomes Fingal's commitment to the provision of high-quality infrastructure and utilities through a plan led and co-ordinated approach to ensure adequate capacity to support future development. In this context, Chapter 5 in the MASP and Chapter 10 of the RSES relating to strategic water and wastewater infrastructure projects will assist in formulating relevant Plan policy.

Submission welcomes that measures to ensure water, air and noise management in accordance with EU and national legislation will be included in the Draft Plan and recommends early engagement with relevant agencies in this regard. Attention is also drawn to the Eastern and Midland Region Waste Management Plan which supports a more resource efficient circular economy and bio-economy as set out in RPOs 7.34 and 10.25 of the RSES.

In the context of formulating policy relating to the provision of high-quality ICT and energy networks and energy planning, attention is drawn to Chapter 8 and 10 of the RSES.

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Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment

The submission welcomes that the preparation of the Draft Plan will be carried out in tandem with various environmental processes such as SEA, AA and SFRA and in this regard, recommends early engagement with the OPW, DHLGH, NPWS, EPA and IW. It is also highlighted that this iterative approach offers the opportunity for:

- i. the integration of sustainable development targets and climate action obligations, including assessment of GHGs in accordance with RPOs 3.6 and 3.7 of the RSES;
- ii. the enhancement of biodiversity and amenities and to ensure the protection of environmentally sensitive sites and habitats and specifically where flood risk management measures are planned in accordance with SFRA requirements set out in RPO 7.12 and RPO 7.15; and
- iii. the incorporation of riparian setbacks where appropriate as set out in RPO 7.26 and
- iv. the identification of risks and ensure the resilience of critical infrastructure as set out in RPO 7.43 of the RSES. The National Adaptation Framework 2018 is also referenced in this context.

CHIEF EXECUTIVE'S RESPONSE

General Overview

FCC acknowledges the statutory provisions set out under Section 10(2)(A) of the Planning and Development Act 2000 (as amended) that requires the new Plan to be consistent with inter alia the NPF, the RSES and associated MASP. The higher-tier planning policy framework will inform the preparation of the Draft Plan.

Vision and Strategic Outcomes

The requirements of Section 10(1)(A) and 10(2)(A) of the Planning and Development Act 2000 (as amended) regarding the requirement for consistency with the NPF, RSES and the MASP are acknowledged. The importance of both the NSOs of the NPF and the RSOs of the RSES are also acknowledged. In this context, the new Plan will take account of the Vision, Key Principles and RSOs of the RSES as set out in Chapter 2. It is recognised that both the national NSOs and the regional RSOs are broadly aligned with United Nations Sustainable Development Goals in areas such as climate action, clean energy, sustainable communities, economic growth, reduced inequalities, innovation and infrastructure, as well as education and health.

Growth Strategy of the RSES

The contents of the submission are noted. The Council acknowledges the 'Growth Enablers for the Region' as well as the provisions of the MASP, both set out in the RSES. The delivery of many of these enablers will require significant support from public and private sector investment in infrastructure and services. The Draft Plan will align with the RSES and specifically the MASP and will focus on the delivery of the key growth enablers.

Sustainable Compact Growth

The Council recognises the principles of sustainable growth embodied in the NPF and RSES and the need to secure more compact urban development patterns with specific targets for the delivery of new homes on infill and brownfield sites within existing urban areas. The Council acknowledges the population growth allocated to the County in the RSES and the MASP. The Council has commissioned an Urban Capacity Study which will be carried out to inform plan preparation, assist in identifying correlations between development sites and infrastructure provision and will inform policy formulation in the Draft Plan. The Plan will include appropriate policies and objectives to promote compact development including higher densities and will identify appropriate locations including strategic development areas where such density can be optimised. In addition,

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the Draft Plan will include a series of focused active land management measures to ensure appropriate development at suitable locations.

Settlement Strategy of the RSES

The Settlement Strategy of the Draft Plan will be prepared having due regard to the strategy and hierarchy set out in the RSES. The Draft Plan will include a Core Strategy Map, the contents of which will be guided by the statutory requirements of Section 10(2) of the Planning and Development Act, 2000 (as amended).

The framework for the Draft Core Strategy as set out in Part 1 of this report demonstrates that the Draft Plan will place a focus on the delivery of the identified Strategic Development Areas within the MASP while also providing for increased densities, reduced vacancy and the re-use of underutilised lands.

National and Regional Population Targets

The provisions of the NPF and RSES with regard to population targets are acknowledged and will inform the Core Strategy. The publication of the recent Section 28 Planning Guidelines on Housing Supply Target Methodology for Development Plans which will assist in the preparation of the Housing Strategy and the Core Strategy is welcomed.

Strategic Issues Papers Themes

People and Place

• Sustainable Communities

The Draft Plan will include measures for the delivery of compact growth including a mix of housing types and tenures, new and enhanced public spaces, the protection of built and natural heritage alongside a connected sustainable transport network and FCC will engage and collaborate with relevant stakeholders in this regard. The NPF and RSES both promote healthy placemaking and support the objectives of public health policy. The Draft Plan will include a range of policies and objectives to promote and facilitate healthy placemaking including those relating to the provision of high-quality design of both the built environment and public realm based on the universal design approach and accessibility for all. Specifically, the provisions of RPOs 9.1 and RPO 9.3 are noted and acknowledged. The need for responsive planning policy that is age and family friendly is recognised. While the County's settlement pattern may not align in all respects with the 10 – 15 minute concept, the underlying principles of compact growth, sustainable travel, reduced car dependence and resilience will be to the fore of the Plan.

With regard to housing need, it is intended to carry out an evidenced based HNDA as part of the review process to inform the Housing Strategy/Core Strategy, and which will guide policies and objectives in the Draft Plan. It is intended that the HNDA will allow for consideration of housing mix in the forthcoming plan. All data set out in the Core Strategy will align with the NPF Roadmap population projections, the RSES projections and the Housing Supply Target Guidelines.

The Council recognises the importance of rural Fingal in terms of sustaining and ensuring continued viability of existing rural communities as well as supporting and facilitating the rural economy. The Draft Plan will have regard to the provisions of the NPF and the RSES in terms of sustaining and enhancing existing rural communities, while also reflecting the outcomes of the Housing Strategy and the Housing Need Demand Assessment, which will identify rural housing needs over the Plan period.

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• Impact of Covid-19

The current Covid-19 global pandemic is having a significant impact on Fingal's workforce, and the legacy of the impact is yet to be determined. However, it appears that a large majority of the workforce may continue to work from home in the future, which will impact commuting, transport and land use planning. The Draft Plan will contain policies to support such facilities.

• Housing

The Draft Plan will be compliant with relevant Ministerial Guidelines to provide for higher residential densities and appropriate qualitative standards and will seek to deliver a wider mix of house types and tenure to meet changing demand and consolidating household sizes. Fingal will continue to work collaboratively with agencies charged with responsibility for infrastructure delivery in the County to ensure a plan-led approach in the co-ordination and timely development, regeneration and phasing of strategic land banks, ensuring infrastructure and deliverability assessment in line with NPOs of the NPF and a tiered approach to land use zoning.

Climate Action

Climate Action will form a key cross-cutting approach throughout the Draft Plan in the context of responding to the impacts of climate change having regard to the relevant provisions of the RSES. Proactive policies for modal shift and sustainable mobility, compact growth and promotion of low emission vehicles and renewables are just some of the overarching aims in terms of reduction in carbon emissions and which are key to the transition to a low carbon economy. Flood risk management is also a tool in terms of addressing climate change and will be considered as part of the Draft Plan. Regard shall be had to relevant National, Regional and Local guidance which is constantly evolving in the context of climate action. The Council will work with the relevant CARO in the development of policies and objectives in the Draft Plan.

Connectivity and Movement

The integration of transport and land use planning with a sustained focus on sustainable mobility including active travel to reduce reliance on the private car will form a key component of the Draft Plan. Fingal will continue to engage and collaborate proactively with the NTA and other relevant stakeholders to identify infrastructural and other measures which will contribute towards a modal shift from the private car including supporting and facilitating the delivery of key public transport projects and key growth enablers that will significantly benefit Fingal and the wider region as well as the implementation of the Greater Dublin Area Cycle Network Plan, all which are key objectives of the Local Authority.

The Draft Plan will also align with Project Ireland 2040 and the RSES which emphasises the importance of public transport and healthy placemaking and will also provide clear policy support for the provision of planned transport infrastructure. The Draft Plan will align with the Smarter Travel and Transport Strategy for the Greater Dublin Area 2016-2035. The comments of EMRA in relation to engaging with key stakeholders to bring about modal shift and the success of accelerated walking and cycling measures are noted and such public realm and active travel interventions will be further explored and supported.

Employment, Economy and Dublin Airport

The guiding principles as set out in the RSES for locating strategic employment and the integration of placemaking as set out in the RSES are acknowledged and will be reflected in the preparation of the Economic Strategy for the County. The quantum/location and types of employment to be located within Fingal will be in line with the RSES guiding principles and the provisions set out for the identified strategic employment corridors in the MASP. In this regard, the strategic importance of the Dublin - Belfast Economic Corridor is

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acknowledged and will be addressed in policy terms in the new Plan. Appropriate policies will also be provided with regard to skills and innovation, research and technology and alternative working models including smart city initiatives as required by the RSES.

In addition, the Council is committed to improving accessibility and inclusivity for all in society, regardless of age, means or abilities. The implementation of the Local and Economic Community Plan will have a key role in driving activities and actions in this regard and will be fully supported by the new Plan. The requirement for the LECP to be consistent with the RSES is noted. It is acknowledged that the Department of Rural and Community Development is currently working on a process to provide guidance to Local Authorities to support the review process and development of the new LECP.

Spatial Distribution of Employment Lands

The Council acknowledges the contents of RPO 5.6 of the MASP which recommends a sequential approach for the development of future employment lands, with a focus on the re-intensification of employment lands within the M50 and at selected strategic development areas, and provision of appropriate employment densities in tandem with the provision of high-quality public transport corridors. In this context, it is noted that the MASP specifically identifies the Dublin Enterprise Zone in D15 and the Swords, Dublin Airport and South Fringe areas within Fingal as strategic locations for employment generation.

Fingal is currently undertaking an economic study looking at the economic and employment profile of Fingal and its land use based on the latest available data. This study will include analysis of the current general employment and zoning objectives, associated land use types, quantum and locations that will form the approach for economic development in the Draft Plan.

Retail

The Council welcomes the contents of the RSES which supports the preparation of a new Retail Strategy for the Region, to include an update of the retail hierarchy and retail floorspace requirements. The retail strategy of the Draft Plan will continue to be informed by the 'Retail Strategy' but also by the Retail Planning Guidelines for Planning Authorities 2012, the retail strategy for the Region as expressed in the RSES, and Section 8.3 of the RSES which set out guiding principles for the location of trip intensive developments such as large-scale retailing.

Cultural Heritage

The current Plan recognises the key contribution that Fingal's cultural and language heritage plays in fostering tourism within the County. Key objectives include support for the growth of cultural tourism and continual engagement and collaboration with all relevant stakeholders to ensure the economic potential of the tourism sector is secured for the benefit of the local economy. The Fingal Heritage Plan 2018-2023 seeks to develop and implement innovative, integrated ways of public engagement with heritage, targeting new audiences across all social, ethnic and age groups with programmes and events. This approach will be carried through to the Draft Plan and it is recommended that it include additional specific references to the importance of heritage to tourism Fingal.

Green Infrastructure and Natural Heritage

Fingal prides itself on the extensive areas of natural open spaces, amenities and parklands within the County and has made considerable progress in developing a strategic Green Infrastructure Network including the

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delivery of significant new regional parks which incorporate resilient design and include significant areas dedicated to nature conservation. Key strategic Greenway projects for cycling and walking including the Fingal

Coastal Way continue to progress. This approach will be carried through the Draft Plan and the guiding principles for Green Infrastructure and Sustainable Urban Drainage set out in the RSES will be fully considered in the plan including the provision of policies and objectives regarding the development of greenways and sustainable development activities within the Dublin Bay UNESCO Biosphere. The potential for the integration of ecosystems services in the context of Green Infrastructure delivery will also be considered in the preparation of the Draft Plan in accordance with the relevant sections of the RSES, including consideration of any relevant outcomes of the Interreg Europe PROGRESS Project at EU level where appropriate.

Infrastructure and Utilities

Fingal has actively engaged with the relevant infrastructural agencies through the early stages of the Plan making process and will continue to do so through each of the Plan making stages. The provisions of the RSES relating to the provision of strategic water and wastewater infrastructure projects as well as communications and digital infrastructure and the development of future energy networks are noted. The Draft Plan will aim to support and facilitate the delivery of this key infrastructure through appropriate policy provision based on continued engagement and collaboration with the relevant infrastructural agency providers.

Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment

During the Pre-Draft consultation phase of the review process, the Planning Authority engaged with various environmental bodies and relevant stakeholders through a series of workshops to gauge key environmental considerations that will inform the preparation of the Draft Plan. Fingal will continue to engage with key relevant environmental bodies throughout the iterative SEA, AA, SFRA and plan process as well as having regard to the provisions of the relevant RPOs in the context of the preparation of the required Environmental Assessments. Issues regarding the protection and enhancement of biodiversity, protection of environmentally sensitive sites, the creation of appropriate riparian corridors and enhancement of amenities will be considered where flood risk management measures are planned. Fingal plays a critical role in the management of major emergencies and has in place a Major Emergency Plan since 2011. Certain critical infrastructure within the County is under the remit of other bodies such as Irish Water, Irish Rail and the Electricity Supply Board (ESB). The Major Emergency Plan includes risk assessment and also severe weather plans.

CHIEF EXECUTIVE'S RECOMMENDATIONS

- Prepare a Draft Development Plan that complies with the provisions set out under Section 10(2)(A) of the Planning and Development Act 2000 (as amended), including Section 28 Guidelines and is consistent with the NPF, the RSES and associated MASP.
- Prepare an evidence-based Core Strategy, Housing Strategy (including HNDA) and Settlement Hierarchy in line with the requirements of the Planning and Development Act 2000 (as amended) that is consistent with the objectives of the NPF, RSES and the MASP and relevant Section 28 guidelines.
- Through placemaking, which encompasses a multi-faceted approach to planning, design and management, the Council will continue to ensure the development of attractive places to live, work and recreate by supporting the development of sustainable communities, quality public realm, community facilities, design and standards and open space throughout the County.

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- Incorporate climate action as an overarching and cross-cutting theme across the Draft Plan in line with policies and objectives contained in the NPF, the RSES, FCC's Climate Change Action Plan 2019-2024 and national legislation.
- Support Renewable Energy projects through the inclusion of appropriate policies & objectives, while also having regard to relevant national and regional policy for both on shore and off shore renewable energy.
- Ensure a sequential and precautionary approach to flood risk management in line with the requirements of the Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009).
- Identify and support the provision of key enabling infrastructure at strategic development sites in Fingal County, as outlined in the MASP, to facilitate their release for development during the lifetime of the Development Plan.
- Liaise and coordinate with Fingal's Local Community Development Committee and Local Enterprise Office to ensure that the appropriate objectives, measures and actions included in the Local Economic Community Plan are supported by policies and objectives in the Draft Plan
- Consult with all relevant public service providers to ensure that zoned lands are serviced in a timely fashion to facilitate opportunities for employment, enterprise creation and residential development.
- Support the economic development of Fingal in line with the policies and objectives stipulated in the National Planning Framework and the Regional Spatial and Economic Strategy and utilise active land measures such as provision of LAP's and masterplans across the County as part of the development approach for Strategic Development Areas and Corridors.
- 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.
- Promote the sequential development of serviceable lands in accordance with the tiered approach to land zoning outlined in the NPF, the RSES and MASP and ensure co-ordination with other neighbouring planning authorities where strategic development corridors traverse county boundaries.
- Promote enterprise and employment throughout the County, including along the Dublin Belfast Economic Corridor, the Metro Economic Corridor, Swords, Blanchardstown and Balbriggan and work with the other Dublin Local Authorities to promote Fingal and the wider Dublin and mid-eastern region as an engine for economic growth.
- Work with TII and other national agencies, to protect and enhance the capacity of national routes, to minimise the impacts on the management of the broader network.
- Promote sustainable settlement and transport strategies within the county and identify measures, including targets for modal shift, to reduce energy use, GHG emissions and adaptation to climate change.
- Promote modal shift to public transport, walking and cycling, encouraging permeability and taking account of national and regional policy and guidance, while supporting an efficient and effective transport system.

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- Support SMARTER Travel initiatives and ensure that the Draft Plan aligns with the NTA's Transport Strategy for the Greater Dublin Area 2016-2035.
- Support the delivery and integration of key transport enablers to accommodate growth over the plan period and beyond, consistent with the NPF and the RSES, including BusConnects, DART expansion, LUAS extension programmes and MetroLink, while maintaining the capacity and safety of strategic transport networks.
- Work with the NTA, TII, and other transport agencies in developing an integrated set of transport objectives for the County in line with the GDA Transport Strategy and National and Regional policy, encouraging modal shift towards more sustainable modes of transport and patterns of commuting.
- Support and reinforce the retail hierarchy within the county having regard to the RSES, or any superseding regional retail strategy, and explore the opportunity to strengthen the retail function in Fingal's towns and villages.
- Support the promotion, protection and perseverance of the county's the unique cultural heritage.
- Promote an awareness of the benefits of Resilient Design and the multi-functional nature of Green Infrastructure. Apply principles of Green Infrastructure to inform the development management process in terms of design and layout of new residential areas, business/industrial development and other significant projects while maximizing the multi-functional nature of Green Infrastructure by ensuring the development of synergies between Public Open Space, Biodiversity, SuDS/Water Sensitive Design and Active Travel objectives.
- Ensure that Sustainable Urban Drainage (SUDs) measures are incorporated into the Draft Plan to reduce the level of surface water run-off, improve water quality and contribute to adaptation to climate change through natural solutions.
- Facilitate and promote the development of energy networks and ICT infrastructure where necessary to facilitate sustainable growth and economic development, subject to proper planning and sustainable development.

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NATIONAL TRANSPORT AUTHORITY

SUBMISSION NO: FIN-C377-342

SUMMARY OF ISSUES

Sustainable Travel and Transport

Submission by the National Transport Authority (NTA) supports the integration of land use and transport policy and recommends that the following be included in the Draft Plan:

- Urban generated development within or contiguous with existing urban areas should be prioritised over less accessible locations.
- Residential developments in urban areas should be carried out sequentially.
- Large scale trip intensive developments such as office and retail should be focused into central locations in urban areas.
- High level of permeability should be delivered in town centres for sustainable modes.
- Sustainable modes should be promoted by maximising the numbers of people living within walking and cycling distance of their neighbourhood and district centres, public transport and other services.
- New development should be fully permeable for walking and cycling and existing areas should be retrofitted as far as is practicable.
- Filtered permeability should be required for new residential developments.
- Trip destinations (employment sites, schools, retail, etc.) should be developed at locations that can maximise the potential to access such developments by walking, cycling or on public transport.

Implementation Plan 2019-2024

Submission references the NTA's Implementation Plan 2019-2024 which sets the range of transport projects to be delivered or commenced. In summary these are:

- BusConnects.
- MetroLink.
- LUAS capacity and network enhancements including LUAS Finglas.
- DART Expansion programme, network development, station and other enhancements including
- Dart + West.
- Integration measures and sustainable transport investments.

The Draft Plan to acknowledge the importance and opportunities arising from these key transport projects in the context of land use planning and include relevant policies and objectives to support and facilitate the successful implementation of these projects. The NTA welcomes continued engagement with FCC relating to the land use and transport planning considerations relevant to these key enabling projects.

Movement at Inter- Settlement Level

It is recommended that an assessment of inter-settlement travel patterns across the County and to key settlements in neighbouring Counties is undertaken, to understand travel patterns and associated transport infrastructure and service requirements for Fingal. Of particular importance in this process will be the examination of commuting patterns to and from Fingal. This profiling can be utilised to understand the relationship between current land use patterns and associated travel patterns which will inform the formulation of land use policies to achieve more sustainable travel patterns as well as transport infrastructure and services needed to meet future inter-settlement travel demand.

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Movement at Settlement Level

It is recommended that Local Transport Plans are prepared for any large development areas within Fingal in order to guide the future growth of these areas. It is recommended that this process is informed by the NTA/TII document Area Based Transport Assessment.

<https://www.nationaltransport.ie/strategic-planning/guidance-documents/>

Public Transport Provision in Rural Areas

The important role that rural transport services perform in providing for social and economic connectivity between small villages, rural areas and larger towns is acknowledged and the service provision under the Local Link Rural Transport Programme is referenced in this regard. The Draft Plan to include policies and objectives to acknowledge and support the role of rural transport services and include reference to the Connecting Ireland Rural Mobility Plan which aims to facilitate improved connectivity and mobility within rural Ireland. The NTA welcomes engagement with Fingal in relation to the land use and transport planning considerations arising from this rural mobility plan.

Park and Ride

It is noted that the NTA is currently preparing a Park and Ride Strategy for the Greater Dublin Area and is likely to include sites in the Fingal area. In advance of the implementation of such sites, the NTA are willing to consider temporary or short-term Park and Ride facilities, including bus-based Park and Ride, which would complement public transport on key transport corridors, subject to compliance with principles set out in the Park and Ride Strategy. The NTA requests that any proposals for Park and Ride facilities should be agreed with the NTA and recommends the Draft Plan include a policy objective requiring prior consultation with the Park and Ride Office relating to the development of Park and Ride facilities in both the short and longer term. The Draft Plan should also include policy support for Park and Ride proposals which are associated with or form part of key public transport infrastructure projects as outlined the submission. In this regard, zoning objectives should specifically support Park and Ride facilities in key areas and this may also apply to built-up areas where Park and Ride may form part of mixed-use developments.

Strategic Road Network

It is noted that the NPF sets out the importance of maintaining and improving the TEN-T core strategic network. The Draft Plan to include policy provision to ensure that the strategic transport function of national roads is maintained and protected in accordance with the Spatial Planning and National Roads Guidelines 2012.

Development Management and Parking Standards

The NTA requests the following in relation to formulating policy surrounding car parking standards:

- All non-residential development proposals should be subject to maximum parking standards.
- Car parking should be capped on an area wide basis in locations where the highest density of development occurs.
- Cycle parking should be appropriately designed into the public realm and specific policies should be included in terms of both the public realm and private developments. In this regard, the NTA references the Standards for Cycle Parking and Associated Cycling Facilities for New Developments document issued by Dun Laoghaire Rathdown County Council in 2018, which includes comprehensive guidance on the design of cycle parking. (http://www.dlrcoco.ie/sites/default/files/atoms/files/dlr_cycle_parking_standards.pdf) refers.
- In designing public transport schemes, such schemes will cater for a certain level of parking demand, including cycle parking. It is evident, however that an area-based parking strategy will be required to

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complement this. The NTA welcomes engagement with Fingal to address area-based parking considerations in the Draft Plan which supports the investment in active modes and compliments investment in public transport.

- All major employment developments and schools travel plans should be conditioned as part of planning conditions consistent with NTA Guidance.

Mode Share Targets

It is recommended that the Draft Plan includes sustainable transport indicators, including mode share for the purpose of monitoring the efficacy of policies and development objectives against a range of sustainable development indicators. In this regard, the NTA welcomes engagement with FCC in relation to the development and analysis of sustainable transport indicators, in conjunction with the OPR.

Accessibility

Enabling universal access and facilitating and promoting universal design should be a key consideration in the Draft Plan as it relates to transport policies and objectives.

National Transport Authority Guidance Documents

The NTA recommends that the preparation of the Development Plan is informed by the following NTA guidance, available on the NTA web site:

- The National Cycle Manual.
- Permeability Best Practice Guide.
- Achieving Effective Workplace Travel Plans: Guidance for Local Authorities.
- Workplace Travel Plans: A Guide for Implementers.
- Toolkit for School Travel.
- Guidance Note on Area Based Transport Assessment (NTA and TII).

It is noted that the NTA is currently reviewing and updating both the Greater Dublin Area Network Plan, in collaboration with the Local Authorities in the GDA, and the Cycle Manual. It is intended that both of these review processes will be concluded in 2021 and the documents, when complete, will provide a robust basis for the implementation of cycle routes in the GDA.

CHIEF EXECUTIVE'S RESPONSE

Sustainable Travel and Transport

Fingal County Council has a key role to play in the implementation and facilitation of sustainable transportation through both its infrastructure and land use policies. At a strategic level, FCC continues to integrate land use and transportation to achieve sustainable development through the progression of a number of Local Area Plans, Urban Framework Plans and Masterplans in line with National and Regional policy objectives including the NTA's GDA Transport Strategy 2016-2035. In this regard, higher density development is taking place within plan frameworks along existing transport corridors and these areas continue to consolidate. Current land use policy has also been developed in anticipation of planned strategic public transport investments that will directly benefit the County.

As part of the review process, an Urban Capacity Study of Settlements within Fingal will be carried out to inform plan policy relating to the growth of Fingal's settlements in line with National and Regional planning objectives for compact sustainable growth and enhanced resilience. In this context, a key component of the study will include an assessment of areas within the walkable catchment of town centres as well as areas close to good quality transport links and displaying high levels of accessibility. The potential for infill development,

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regeneration, densification and mixed-use development will be examined within these areas in the context of this study.

Through FCC's role in Development Management, permeability is a key objective in all new developments, and in particular residential development, maximising the ability of future residents to avail of public transport and active modes of travel. Filtered permeability is deployed on a regular basis as standard practice within all new developments. FCC's Active Travel Department is focused on providing key connections through existing developments to improve permeability for walking, cycling and access to public transport. The Draft Plan will continue to support these policies. Sustainable Swords, an Urban Realm Strategy currently being undertaken by the Council aims to deliver a high level of permeability in Swords, to facilitate a modal shift to active travel modes and facilitate access for the majority of Swords residents to the future BusConnects and MetroLink schemes. The strategy will produce a number of recommendations that the Council would then aim to implement in other towns and villages across the County. In addition to Sustainable Swords, initiatives such as Our Balbriggan and Blanchardstown Town Centre Area Based Transport Assessment are examples of projects working towards the achievement of higher densities and more sustainable forms of urban development.

Implementation Plan 2019-2024

A modern, efficient and well-integrated public transport network for the County to meet transport demand has been a long-standing objective of FCC to enable future sustainable growth and mobility and will continue to be a key consideration for the new Plan, in line with National, Regional and Local policy frameworks. The delivery of the BusConnects, MetroLink, DART + and LUAS Expansion projects will continue to be supported by the Council. As such, the Draft Plan will include policies which continue to support the NTA in the development of these key public transport enablers in line with the NPF, NDP and the RSES. These projects promote a high level of network integration and interchange facilities and represent key components of an integrated transport network that will bring significant economic, social and environmental benefits to Fingal and the wider Dublin and mid-east region.

Movement at Inter- Settlement Level

As part of the review process, FCC is undertaking a strategic transport study to assess and underpin the requirement for key transport objectives in the new Plan for the north and west of the County. Inter-settlement travel patterns will be assessed as part of the study with a view to determining opportunities for the provision of sustainable transport modes, increasing connectivity and permeability and to inform land use policies in the Draft Plan. The South Fingal Transport Study completed in 2019 undertook a transport assessment of the South Fingal area, including the area around Dublin Airport, with a focus on sustainable transport objectives. The study examined travel patterns for the area under assessment which included the Airport and made several recommendations pertaining to travel patterns along the Fingal South Fringe and Dublin City North Fringe areas. The focus for the Draft Plan will similarly look to determine opportunities for the provision of sustainable transport modes including active travel.

Movement at Settlement Level

FCC currently requires any large development to undertake mobility management plans, supported by current Plan objectives. Area Based Transport Assessment (ABTA) is sought as a requirement on developments of significant size, including forward planning initiatives such as LAP's. As such, this issue is already being addressed and the Draft Plan will continue to underpin these requirements through supportive policy and objectives.

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Public Transport Provision in Rural Areas

Maximising accessibility to rural areas within the County through support for rural transport will form a consideration for the new Plan in addressing social exclusion and improving connectivity and mobility within rural areas. The Council already works with public transport providers including the NTA in relation to the Local Link Rural Transport Programme and provisions of the NTA's Connecting Ireland Mobility Plan will be acknowledged and supported in the Draft Plan. In this context, the Council will continue to engage with the NTA and other relevant transport providers relating to the provision of rural transport services. At a more strategic level, the challenge is to ensure a sustainable pattern of development that integrates land use with transport and reduces the need to travel from more isolated areas to key centres of employment and services. Where options are limited in terms of travel from rural areas to nearby urban centres, the Draft Plan will continue to include policies to minimise private car use within urban centres, thereby freeing up road space for those who have limited other transport options.

Park and Ride

FCC will continue to engage with the NTA and other relevant stakeholders regarding the identification and development of Park and Ride facilities at appropriate locations. The zoning requirements and transportation requirements and impacts of such facilities will be considered further in terms of the required policy objectives, if any, for the Draft Plan.

Strategic Road Network

The protection of strategic transport corridors within the County is considered critical for the future prosperity of Fingal as well as at a wider regional and national level. The current Plan includes objectives to protect the core strategic road network and this policy approach will be carried through to the new Plan.

Development Management and Parking Standards

Car parking standards will be revisited and revised in the Draft Plan to ensure that the provision of parking will continue to be assessed in terms of urban realm, public transport accessibility, traffic impact and other considerations as required. The Draft Plan will also set out more clearly defined policy objectives around the provision of cycle parking for new developments, including accessibility, storage, security and design.

Mode Share Targets

FCC will continue to work closely with the NTA and other stakeholders as required to address this issue for consideration in the Draft Plan.

Accessibility

Accessibility and access for all abilities is a key issue for Fingal in the provision of new infrastructure. FCC will continue to work closely with the NTA and other stakeholders as required to address this issue in the Draft Plan.

National Transport Authority Guidance Documents

In striving to encourage, facilitate and deliver sustainable transport provision, the Council regularly refers to the NTA documents as listed in the delivery of new infrastructure, forward planning and land use considerations as well as the Development Management function of the Council. The preparation of the Draft Plan will be informed by NTA guidance documents such as those listed. Fingal's current cycling and walking

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infrastructure is guided by the National Cycle Manual and the GDA Cycle Network, and will continue to do so, including any subsequent updated documents pending the review of these documents.

CHIEF EXECUTIVE'S RECOMMENDATIONS

- Promote and facilitate the universal design approach into all developments.
- 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.
- Work with TII and other national agencies, to protect and enhance the capacity of national routes, to minimise the impacts on the management of the broader network.
- Promote modal shift to public transport, walking and cycling, encouraging permeability and taking account of national and regional policy and guidance, while supporting an efficient and effective transport system.
- Support the delivery and integration of key transport enablers to accommodate growth over the plan period and beyond, consistent with the NPF and the RSES, including BusConnects, DART expansion, LUAS extension programmes and MetroLink, while maintaining the capacity and safety of strategic transport networks.
- Work with the NTA, TII, and other transport agencies in developing an integrated set of transport objectives for the County in line with the GDA Transport Strategy and National and Regional policy, encouraging modal shift towards more sustainable modes of transport and patterns of commuting.
- Seek to implement the provision of the Design Manual for Urban Roads and Streets (2019) in relation to the delivery of safe streets and overall best practice design and promote the principle of filtered permeability.
- Review the standards and the car and cycle parking requirements for residential and non-residential development in line with national planning and transport policy requirements.
- Support the provision of Park and Ride facilities at suitable locations in accordance with proposals set out by the NTA.
- Support the Local Link Rural Transport Strategy.

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Part 3: Summary of Submissions & Chief Executive's Response & Recommendations

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THEME 1: PEOPLE AND PLACE

Submissions Received:

FIN-C377-5, FIN-C377-6, FIN-C377-7, FIN-C377-8, FIN-C377-9, FIN-C377-13, FIN-C377-14, FIN-C377-18, FIN-C377-19, FIN-C377-22, FIN-C377-23, FIN-C377-24, FIN C377-25, FIN-C377-33, FIN-C377-36, FIN-C377-38, FIN-C377-39, FIN-C377-40, FIN-C377-41, FIN-C377-43, FIN C377-44, FIN-C377-48, FIN-C377-53, FIN-C377-56, FIN-C377-57, FIN-C377-58, FIN-C377-59, FIN-C377-61, FIN C377-62, FIN-C377-64, FIN-C377-65, FIN-C377- 66, FIN-C377-69, FIN-C377-71, FIN-C377-72, FIN-C377-73, FIN C377-74, FIN-C377-75, FIN-C377-78, FIN-C377-79, FIN-C377-80, FIN-C377-81, FIN-C377-82, FIN-C377-85, FIN C377-86, FIN-C377-87, FIN-C377-90, FIN-C377-91, FIN-C377-92, FIN-C377-95, FIN-C377-96, FIN-C377- 97, FIN C377-98, FIN-C377- 99, FIN-C377-101, FIN-C377-103, FIN C377-104, FIN-C377-105, FIN-C377- 106, FIN-C377-107, FIN C377-108, FIN-C377-109, FIN-C377-110, FIN-C377-111,FIN-C377-114, FIN-C377-115, FIN-C377-118, FIN-C377-119, FIN C377-120, FIN-C377-122, FIN-C377-124, FIN-C377-125, FIN-C377-129, FIN-C377-132, FIN-C377-133, FIN-C377-134, FIN C377-137, FIN-C377-138, FIN-C377-139, FIN-C377-141, FIN C377-142, FIN-C377-143, FIN-C377-144 , FIN-C377-146, FIN-C377-147, FIN-C377-148,FIN-C377-150, FIN-C377-151, FIN-C377-153, FIN-C377-154, FIN-C377-155, FIN-C377-156, FIN-C377-158, FIN-C377-159, FIN-C377-160, FIN-C377-163, FIN C377-164, FIN-C377-165, FIN-C377-166, FIN-C377-167, FIN C377-169, FIN-C377-170, FIN-C377-172, FIN-C377-173, FIN C377-174, FIN-C377-175, FIN-C377-177, FIN-C377-178, FIN C377-180, FIN-C377-181, FIN-C377-182, FIN C377-187, FIN-C377-188, FIN-C377-189, FIN-C377-190 , FIN-C377-192, FIN-C377-193 , FIN-C377-194, FIN-C377-195, FIN C377-196, FIN-C377-198, FIN-C377-199, FIN-C377-200, FIN-C377-201, FIN-C377-202, FIN-C377 203, FIN-C377-204, FIN-C377-205, FIN-C377-206, FIN-C377-207, FIN-C377-208, FIN-C377-209, FIN C377-212, FIN-C377-215, FIN-C377-216, FIN-C377-218, FIN C377-219, FIN-C377-221, FIN-C377- 223, FIN-C377-225, FIN C377-226, FIN-C377-227, FIN-C377-230, FIN-C377-231 ,FIN-C377-232 ,FIN C377-233, FIN-C377-234 ,FIN-C377-235, FIN-C377-236 ,FIN-C377- 237,FIN-C377-240,FIN-C377-241, FIN-C377-243, FIN C377-244, FIN-C377-245, FIN C377-246, FIN-C377-247, FIN-C377-251,FIN-C377-252, FIN C377-253, FIN-C377-255, FIN C377-257, FIN-C377-259, FIN-C377-261, FIN-C377-262, FIN-C377-263, FIN-C377-264, FIN-C377-267, FIN-C377-268, FIN-C377-269, FIN-C377- 271, FIN-C377-272, FIN-C377-275, FIN-C377-276, FIN-C377-277, FIN-C377-281,FIN-C377-282, FIN-C377-283,FIN C377-284, FIN-C377-285, FIN-C377-286, FIN-C377-287, FIN-C377-289, FIN-C377-290,FIN C377-291, FIN-C377-293, FIN-C377-294, FIN-C377-295, FIN-C377-296, FIN-C377-297, FIN C377-298,FIN-C377-299, FIN-C377-300, FIN-C377-301, FIN C377-302, FIN-C377-303, FIN C377-304, FIN-C377-306, FIN C377- 308, FIN-C377-309, FIN C377-310, FIN-C377-311, FIN-C377-313, FIN-C377-315, FIN-C377-316, FIN-C377-319, FIN-C377-322, FIN-C377-323, FIN C377-324, FIN-C377-325, FIN C377-328, FIN-C377-329, FIN C377-330, FIN-C377-331, FIN C377-332,FIN-C377-333, FIN-C377-334, FIN-C377-335 ,FIN-C377-338, FIN-C377-339, FIN-C377-340, FIN-C377-343, FIN-C377-344, FIN-C377-345, FIN-C377-347, FIN-C377-348, FIN-C377-353, FIN-C377-357, FIN-C377-358, FIN-C377-359, FIN-C377-361, FIN-C377-363, FIN-C377-367, FIN-C377-368, FIN-C377-370, FIN-C377-371, FIN-C377-372, FIN-C377-373, FIN-C377-374, FIN-C377-375,FIN-C377-376 ,FIN-C377-377, FIN-C377-378, FIN-C377-379, FIN-C377-381, FIN-C377-382, FIN-C377-384, FIN-C377-385, FIN-C377-386, FIN-C377-388, FIN-C377-389, FIN-C377-392, FIN-C377-393, FIN-C377-397, FIN-C377-398, FIN-C377-399, FIN-C377-401, FIN-C377- 402, FIN-C377-403, FIN-C377-404, FIN-C377-406, FIN-C377-407, FIN-C377-408 , FIN-C377-409, FIN-C377-410, FIN-C377-412, FIN-C377-414, FIN-C377-416, FIN-C377-417, FIN-C377-418, FIN-C377-419, FIN-C377-420, FIN-C377-421, FIN-C377-422 ,FIN-C377-423, FIN-C377-425, FIN-C377-426, FIN-C377-427, FIN-C377-428, FIN-C377-429, FIN-C377-430, FIN-C377-431, FIN-C377-437, FIN-C377-438, FIN-C377-439, FIN- C377-440, FIN-C377-441, FIN-C377-446, FIN C377-449, FIN-C377-450, FIN C377-451, FIN C377-453, FIN-C377-455 , FIN-C377-456, FIN-C377-457, FIN-C377- 458, FIN-C377-460, FIN-C377-462, FIN-C377-463, FIN-C377-464, FIN-C377-466, FIN-C377-468, FIN-C377-469, FIN-C377-470, FIN-C377-471, FIN-C377-472, FIN-C377-473, FIN-C377-474, FIN-C377-475, FIN-C377-476, FIN-C377-478, FIN-C377-479, FIN-C377-480, FIN-C377-481, FIN-C377-482, FIN-C377-483, FIN-C377- 484, FIN-C377-485, FIN-C377-486, FIN-C377-487, FIN-C377-488, FIN-C377-489, FIN-C377-490, FIN-C377-491, FIN-C377-492, FIN-C377-493, FIN-C377-494, FIN-C377-495, FIN-C377-496, FIN-C377-497, FIN-C377-498, FIN-C377-500, FIN-C377-501, FIN-C377-502, FIN-C377-503, FIN-C377-504, FIN-C377-505, FIN-

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C377-506, FIN-C377-507, FIN-C377-508, FIN-C377-509, FIN-C377-510, FIN-C377-511, FIN-C377-512, FIN-C377-514, FIN-C377-515, FIN-C377-516, FIN-C377-517, FIN-C377-518, FIN C377-520, FIN-C377-521, FIN-C377-522, FIN-C377-527, FIN-C377-536, FIN-C377-538, FIN-C377-540, FIN-C377-541, FIN-C377-542, FIN C377-543, FIN-C377-544, FIN-C377-548, FIN-C377-549, FIN-C377-550.

SUMMARY OF ISSUES

STRATEGIC OVERVIEW

A Vision for Fingal:

Multiple submissions were received identifying the unique characteristics, historic qualities and sense of place associated with Fingal's settlements. Whilst acknowledging population growth and the resultant need for consolidated development, enhanced sustainability, inclusivity and resilience, submissions called for a holistic approach to such expansion, ensuring the views of stakeholders young and old are incorporated, simultaneous provision of social and community infrastructure, the need to underpin with climate action objectives, preservation of local identity and access for all.

Submissions called for sustainability to be enshrined at the heart of the Draft Development Plan to significantly reduce the County's Carbon footprint.

There was recognition that settlement densification builds strong identity, increases viability and economies of scale in infrastructural investment and provides alternatives to unsustainable travel patterns. Multiple submissions highlighted the need to ensure that such an approach is balanced by high standards of development, the importance of successful healthy placemaking, the integration of established and new communities, provision of suitable public open spaces and recreational amenities and to ensure that the needs of existing settlements are not overlooked.

Submissions requested that the UN Sustainable Development Goals form a core part of and constitute the driving force behind the Development Plan.

Multiple submissions refer to national and regional guidance enshrined in NPF, RSES and MASP, as well as national guidance under Section 28 of the Planning and Development Act 2000 (as amended) and Government Circulars. Submissions also called for the Draft Plan to address the following:

- Ensure development is sustainable
- Facilitate compact growth and emphasise consolidation rather than greenfield expansion.
- Protect and invest in Fingal's rural communities and sympathetic expansion of existing settlements.
- Preservation of strategic greenbelts to prevent inter-settlement and inter-county coalescence and preserve Fingal's agricultural industry.
- Focus future development within the Metropolitan area of the County allowing for appropriate growth of the Core Area, self-sustaining growth towns, self-sustaining towns, towns and villages.
- Ensure consistency with the National Planning Framework Ireland 2040, the Eastern and Midland Regional Spatial and Economic Strategy (RSES) and the Dublin Metropolitan Area Spatial Plan (MASP).
- Preservation of Fingal's important natural environment and biodiversity.
- The importance of and need to expand the County's Green Infrastructure network, including its parks, strategic open spaces, Greenways as well as walking and cycling connectivity.
- Need for enhanced public transport.
- Coastal protection and better utilisation of Fingal's coastal amenities.

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While summarised in detail in Part 2 of this report, the submission from EMRA states that in determining the overall vision in the Draft Plan, the Council must consider the Vision, Key Principles and RSOs as set out in Chapter 2 of the RSES. It is further noted that the RSOs are aligned with the NSOs of the NPF and the ability to demonstrate their delivery may potentially be linked to future funding sources. The three Key Principles underpinning the RSES, Placemaking, Climate Action and Economic Opportunity are highlighted.

Core Strategy:

Multiple submissions were received in relation to the Core Strategy, Settlement Strategy, Population and Housing Targets, Household Formation and the requirement to undertake Housing Need and Demand Assessment.

Submissions received assert that the Draft Plan must comprise an evidence-based approach to land-use zoning and settlement planning as set out in legislation and planning guidance. Submissions point to the need to ensure that development is prioritised within the Metropolitan area of the County, complies with MASP, allocates growth within the Fingal Settlement Hierarchy identifying settlements which could accommodate additional growth in line with national and regional guidance, encourages sequential expansion of settlements and seeks return from investment in high capacity high frequency public transport investment. Submissions call for the majority of new housing allocations to be directed to areas within the Metropolitan Area of the County with justification for further zonings and increased densities based on projected population for Dublin from the RSES. Submissions call for selected settlements in the Core area which have appropriate characteristics to facilitate sustainable development to receive an allocation of population and housing growth in order to successfully complement the Metropolitan Area.

Submissions indicated the critical need for the Core Strategy to be robust, methodical and derived from the current statistical evidence. Lands identified for development must be capable of being delivered over the life time of the Plan and as such, an active land management approach is advocated as fundamental in drafting the new Core Strategy. The Sequential approach is advocated.

The submission from EMRA requires that the Settlement Strategy aligns with the RSES as set out in Chapter 4 and specifically Tables 4.2 and 4.3 which relate to the settlement hierarchy and typologies as well as Chapter 5 relating to MASP. Population targets should be applied as set out in the NPF Implementation Roadmap and NPO 68 of the NPF, which allows a reallocation of population to 'Key Towns', one of which is Swords. The submission also recommends that the review process be informed by a robust evidence-based approach in formulating the Core Strategy for the County and as part of the Local Authority's overall Housing Need and Demand Assessment (HNDA). The submission also notes that Section 28 Guidelines on Housing Supply Target Methodology and the transitional population projections methodology in the NPF Implementation Roadmap and Circular FPSO4/2018 relating to the preparation of HNDA will support the preparation of evidence-based housing strategies.

Submissions call for NPO 72a of the NPF to be upheld ensuring that the Planning Authority applies a standardised, tiered approach to differentiate between (i) zoned land that is serviced and (ii) zoned land that is serviceable within the life of the Plan.

Compact Growth:

Multiple references were made in submissions to consolidated growth, the need to identify and repurpose brownfield and redevelopment opportunities in existing settlements and in proximity to public transport infrastructure. The benefit of such sites in meeting sequential development opportunities was also noted. Submissions call for an audit of vacant and underutilised land within the County as part of the Council's active land management functions in the context of facilitating compact growth, regeneration, transport orientated

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development and responding to climate change obligations in line with relevant National and Regional policy objectives.

The submission received from EMRA draws attention to the guiding principles for infill and brownfield development and the creation of a database for strategic brownfield lands. The submission seeks the identification of regeneration lands in the Core Strategy. Chapter 3 of the RSES and Section 3.2 and relevant RPOs are highlighted in this context.

A submission from the Land Development Agency advocates the compact growth approach in strategic sustainable settlements and request that the Draft Plan promotes utilisation of available funding for plan-led development and regeneration to support the most efficient use of State land and existing infrastructure. The submission also states that the Plan would benefit from the inclusion of a site selection criteria/framework to prioritise major regeneration opportunities.

A significant number of submissions call for the identification of regeneration/repurposing opportunities associated with planned investment in high frequency, high capacity public transportation including Metro Link, BusConnects, DART + Programme, and Greenways. Submissions refer to the requirements to promote increased residential densities and new settlements proximate to such infrastructure, to review current land use policies and objectives, to ensure coherency in zoning approaches and to ensure a return on investment.

A submission also called for the Draft Plan to support the inclusion of a new stop on the Dublin - Belfast line between Malahide and Portmarnock.

A submission was also received requesting the continued inclusion of Objective DMS121 (or similar) allowing high density development along the MetroLink route in accordance with the land use plans. Submissions from Dublin Bus, Department of Transport and TII were noted and welcomed in relation to the recognition of alliance between compact growth initiatives and public transport investment. In this regard, the Department of Transport notes that the sustainable mobility policy will be closely aligned with the national strategic outcomes of the NPF, particularly in relation to compact growth. The Planning Authority is requested to review its policies and objectives, to have regard to the strategic national and regional objectives of the NPF, RSES and Ministerial Guidelines relating to sustainable development in the Dublin Metropolitan Area to ensure that it develops in a sustainable manner.

The submission from Dublin Bus highlights the need for co-ordination between land use planning and transportation which is critical in achieving compact growth.

TII requests that Fingal consider the implications of land use policies on the strategic national road network as a criterion in determining the future land use-zoning strategy to be outlined in the Draft Development Plan and the respective Core Strategy. The use of Sustainable Land Use and Transportation Recommendations as included in the submission from An Taisce is also noted.

Submissions were also received cautioning the linking of residential development on lands subject to LAPs and Masterplans with the delivery of major public transport infrastructural projects including Metrolink which was viewed as onerous, liable to delays and counter to the sequential delivery of lands for development. The unfavourable weighting of commercial development ahead of residential was also raised as a concern.

Submissions also called for the removal of objectives from the Plan to prepare Masterplans and the subsuming of applicable policies and objectives into the Draft Development Plan.

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Submissions sought a review of land use zoning policies in the Draft Plan, particularly where a justification for residential consolidation presents on lands currently precluding residential use. Zoning categorisation should be extended to include additional uses such as e.g. Housing for the Elderly.

Submissions also call for the removal of artificial planning standards being applied (e.g. maximum density) as a means of addressing the housing crisis.

Population Projections and Housing Targets

A number of submissions refer to the requirement for HNDA to inform the Housing Strategy, referring to recent Government guidance on the preparation of HNDA and research conducted by the ESRI on projected housing demand for local authorities. The specific demographic characteristics applicable to Fingal including its young population base, significant growth rates over intercensal periods and high household occupancy rates were highlighted and it was suggested that Fingal will continue to experience high demand for housing into the future.

Submissions stress that the latest available data from the CSO and ESRI on population and housing must be taken into consideration in formulating the Core Strategy. A number of submissions also suggest that the HNDA figures applicable to Fingal may be underestimated in terms of the anticipated housing need.

The HSE requests stakeholder engagement in the HNDA to inform policies, objectives, requirements and needs in such areas as housing locations and typologies.

The need to ensure 'headroom' in determining the number of new dwellings required to meet the projected population in the County was also raised.

A submission from EMRA refers to RPO 9.5 under which Local Authorities will be supported in preparing a HNDA. The submission calls for a consistent methodology approach for the four Dublin Authorities.

Submissions also seek clarity in relation to population projections for the Dublin Region and how these have been allocated between the four Dublin local authorities. Clarity also sought regarding population projections for Fingal, how existing zoned land (residential, industrial, employment) will accommodate future population growth and if the correct locations are identified.

Household Formation:

Numerous submissions call for the provision of increased choice of housing typologies, tenure and unit sizes in the market and specifically for greater choice in down-sizing, smaller units, studios and 1 and 2 bed homes. Submissions received also point to a shift in household occupancy and composition tied to societal changes including lower fertility rates which have resulted in decreased demand for larger dwelling sizes/increased demand for smaller units. The average household size in Dublin was 2.75 persons per household in 2016 and is reducing. The Draft Plan must facilitate delivery of housing which meets the needs of all the population and ensure a range of housing options given that the trends over the next 10 years are for lower household size and consolidated household composition.

Strategic Residential Locations:

Multiple submissions were received identifying settlements, boundary amendments, site specific policy adjustments so as support the sustainable growth of Fingal and comply with national strategic outcomes and national policy objectives of the NPF and Regional Strategic Outcomes and Regional Policy Objectives of RSES

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and MASP in facilitating sustainable growth across the County. These include lands at Swords, Kinsaley, Dunsink, Malahide, Sutton, Donabate, South Fringe, Baldoyle, Portmarnock, Howth, Charlestown, Dublin 15, Lucan, Skerries/Hacketstown, North Fringe, Lusk, Rush, Castleknock, Naul, Dubber/Balseskin, Clonsilla, Blanchardstown Town Centre, Pavilions Swords, amongst others.

Submissions also indicated that development to date in some settlements has surpassed previous allocations and no further development should be allocated.

Submissions indicate that where there is surplus supply, land must be de-zoned, down-zoned or phased.

A submission from NAMA included the identification of strategic landbanks at Belcamp, Barrysparks in Swords, Lissenhall, and Dunsink as being capable of supporting the achievement of NPF and RSES objectives. Recommendations contained within the submission are made requesting amendments to current Local Area Plan requirements to a preferred Masterplan approach, removal of infrastructure caveats relating to MetroLink delivery and re-examination of the quantum of zoned land in the County.

A requirement for comprehensive planning frameworks is considered essential in bringing forward key development lands to support the achievement of positive planning outcomes and investment decisions and particularly those related to public transport. A requirement for the preparation of Local Area Plan/Frameworks for strategic landbanks at Lissenhall and Dunsink to form part of the preparation of the Draft Plan is noted

Numerous submissions refer to the need for new and or updated LAPs for specific settlements across the County. Submissions also refer to Developer led Masterplans to address housing demand.

Town Centre Development

Submissions point to Fingal's Self-Sustaining towns having a low ratio of employment to residential workforce, indicating an imbalance in employment provision relative to the resident workforce which must be addressed in the Draft Plan. The merits of the RA-Residential Area land use zoning are raised as a means of addressing the requirements for employment to coincide with the projected population increases in Fingal and to better facilitate sustainable and sequential development.

In relation to employment generation, submissions refer to the need to strengthen and consolidate town and village centres, adopt 'Town Centre First' Principles, prioritise investment to address dereliction, as well as pursuing public realm improvement schemes, Urban Frameworks Plans and town and village renewal incentives, including 'Living over the Shop' initiatives.

It is submitted that a two-tier hierarchy of rural villages within Fingal should be implemented for the lifetime of the next Development Plan identifying those settlements capable of expansion with those villages located within the Metropolitan Area designated as Tier 1 settlements..

Multiple submissions were received promoting the need for the Draft Plan to include objectives and policies which support regeneration of brownfield sites for mixed use development.

A submission also seeks the removal/amendment of Objective GIM21 in the South Shore Rush area and promotion of compact growth.

Submissions received from Swords Pavilions Shopping Centre and from the Blanchardstown Centre are noted. The submission from the Blanchardstown Centre notes that in accordance with national and regional planning policy, the Core Strategy and Settlement Hierarchy Chapter of the new Plan, should continue to target

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Blanchardstown Town Centre for significant growth in population, housing, retail and economic activity. The settlement strategy objectives SS12, SS13 and SS14 of the current Plan should continue to be included, as amended, as part of the new Plan.

The submission from Swords Pavilions notes the role and function of the centre, and its future development ambitions as part of the Major Town Centre of Swords. As a strategic component of the town centre, with greater capacity to accommodate modern interventions, it is submitted that the site should be allowed to optimise its development potential and set its own density and design standards.

A number of submissions related to public realm on the main streets of towns and villages as well as shopfront improvements.

Building Heights and Density Standards

Submissions indicate a wide variation in consensus regarding building heights and densities with views expressed that height restrictions be re-imposed/development heights capped, discouragement of high rise in small towns, increased heights reserved for landmark sites in appropriate locations. Submissions also called for the development of houses over apartments. Concerns were raised in relation building height guidance in terms of scale, density and compatibility with adjoining residential estates, local heritage, ACAs, open space amenity and daylight standards. Other submissions called for increased building heights as a means of achieving sustainable growth, increasing densities, and maximising brownfield opportunities.

Submissions in relation to the application of density standards across the County also varied widely. Views were expressed that towns expand at low/medium densities e.g. 20-30 residential units per hectare on the outskirts of Malahide or in some instances very low densities (10-15 per hectare/ and edge of town 15-20 in Balrothery) with a moratorium suggested on further apartment development in certain locations including Howth.

Multiple submissions also referred to national and regional planning policies, suggesting that the Development Plan promote high density schemes to support consolidation and compact growth, promote high density mixed-use development in town centres supported by existing and planned public transport infrastructure and in some instances, site optimisation by allowing schemes to set their own densities. To increase housing supply, submissions indicate that artificial planning controls such as maximum densities (and restricted densities) be removed.

Submissions also called for a more nuanced approach to density in the Development Plan to allow for ease of integration in relation to new schemes. Submissions referred to recent guidance issued with regard to Residential Densities in Towns and Villages as set out in Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas.

Community Engagement

The importance of engagement with key stakeholders and communities and for clear communication between local groups, Elected Representatives and the Local Authority was raised in a number of submissions. The pedestrianisation of New St. Malahide was raised as an initiative which required enhanced stakeholder engagement. Empowerment of local communities by providing expertise and administrative support at local level (localised version of PPN) was also raised as was the suggestion of establishing community forums in all villages to address local issues as they arise.

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Submissions raised the need to ascertain the views of young people and adolescents with initiatives such as neighbourhood mapping by children and a 'Young Scientist' type event for young people to put forward their ideas.

Social Inclusion

Submissions refer to the requirement for the Development Plan to be inclusive of all members of society including children, families, the elderly, lone parents, the disabled with measures to ensure inclusivity in all aspects of day to day life, including design of the public realm, community and recreational facilities, access to housing and universal design. Submission from Voice of Vision Impairment Ireland is welcomed -disability and accessibility are recognised as cross-cutting themes including the need for Access All Areas. Submissions also from Skerries Autism Friendly Town seek to introduce measures to enhance experiences for children with Autism including introduction of Picture Exchange Communication System Boards (PECS) in playgrounds and sensory trails. Submissions also call for the introduction of Heritage signage in Braille including spoken descriptions.

Submission from the Environmental Health Service under Healthy Ireland highlights the unequivocal relationship between socio-economic status and health inequality and the need for connected and well-served communities, delivery of local services (including health) and measures to proactively address health inequalities and improve community inclusion of people with disabilities in their local community. Submissions also call for appropriate emergency services and accommodation and to ensure that children from minority backgrounds do not suffer from social isolation.

TUSLA Child and Family Agency requests the need for supports/ services for marginalised young people to be made available, as well as for those who are homeless or living in family hubs/hostels or at risk of homelessness. Provision for a comprehensive affordable/ sustainable social infrastructure for a range of social services provided by community voluntary and statutory services.

Successful Placemaking

Multiple submissions were received in relation to the need to ensure a holistic approach to placemaking and communities ensuring the delivery of infrastructure, community facilities and recreational areas ahead of or in tandem with residential developments. Numerous submissions also expressed the opinion that no further development be permitted within settlements in advance of the delivery of such facilities and that the Development Plan adopt a 'Residents First Approach'. Submissions point out that the rapid pace of housing growth in a number of centres has not been met by a parallel delivery of community facilities and proactive policies are required to address social infrastructure deficiencies. A number of submissions also raise the point that the social and community infrastructure requirements of existing communities should be given equal consideration to those of new developments and that detailed risk/impact assessments of new development on existing communities, including infrastructural capacity, should be undertaken.

Submissions request that mechanisms are put in place to ensure that sufficient lands are set aside for social and community facilities and that land could be gifted to the community in large scale schemes for social and other uses. Submissions also refer to the need to ensure retail, enterprise and employment zones/areas can be easily accessible by all modes of transport and all sections of society. Submissions refer to the promotion of a built environment which encourages opportunities for physical activities including 'Smarter Travel', 'The National Cycle Policy Framework', 'A Framework for Improved Health and Wellbeing 2013-2025' and 'Get Ireland Active! National Physical Activity Action Plan for Ireland'. The achievement of a just transition to a low carbon society was also highlighted.

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Views were expressed that in order to ensure healthy placemaking development should be plan-led – including Masterplans, Local Area Plans and Framework Plans. Plan-led development was requested for numerous settlements including Oldtown, Dunsink, Lissenhall, Meakestown, Rowlestown, Naul, Rush and Lusk.

Concern was expressed that large housing schemes sometimes fail to integrate sufficiently with existing settlements and community fragmentation was identified as a serious concern with few opportunities for citizens of differing ages/social groups to meet and interact. Larger scheme should be accompanied by Design Statements.

Submission also raised concern that Objective BALDOYLE 2, to prepare a Masterplan for Baldoyle Industrial Estate and Kilbarrack Industrial Estate, in the current Development Plan has not been carried out.

Safer Living Environment

Submissions refer to the need for new Garda stations at locations including Lusk, Rush and Donabate, including the need for increased Garda presence at beaches and train station. Emergence of anti-social behaviour as a result of drinking alcohol outdoors was highlighted with reference to The Green Malahide.

Protection of Greenbelts

A number of submissions raised the importance of preserving existing greenbelts including that between Lusk and Rush (retention of development within the orbital belt) Howth, Swords and south of Skerries. Submissions also reference the need to control urban sprawl close to the border with Co. Meath and to ensure Development Plan policy is devised to preserve greenbelt/agricultural lands at this location and prevent coalescence of settlements.

Other submissions refer to the strategic benefit of utilising greenbelts to ensure sustainable patterns of settlement and employment, particularly those within the Metropolitan area.

The importance of agriculture to Fingal and its rural communities must be acknowledged in the Development Plan.

Public Realm

A significant thread which permeates a number of the submissions relates to public realm improvements and the need to promote resilience in the County's urban and rural centres in the aftermath of the Corona virus pandemic. This is a common theme across urban and rural settlements, villages and towns as well as established and growing communities. Submissions call for increased investment in facilities to cater for and expand outdoor dining/casual eating including additional outdoor seating, picnic/BBQ areas, waste collection and toilet facilities. This includes enhancement of outdoor amenities in settlements including Blanchardstown, Rush, Lusk, Swords, Malahide, Balrothery and Howth. Town branding/village entry enhancement is also raised.

While there was general consensus in relation to town and village public realm enhancement measures such as street tree planting, strengthening of entrance to villages/towns, flower beds, improved signage strategies, improved maintenance, new public art, additional street furniture, clear wayfinding, promotion of Tidy Towns initiatives and remediation measures such as removal of overhead powerlines; a significant number of submissions also call for a re-thinking in the way in which the public realm is used, particularly with regard to the experience of pedestrians and cyclists. Submissions call for restrictions on vehicular traffic on the main streets, widening of footpaths, introduction of pedestrianisation schemes and improved pedestrian and cyclist

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safety measures. A number of submissions refer to the creation of new public spaces/piazza's e.g. Howth and Naul. Some submissions also request additional parking provision e.g. Rush.

The completion of works outlined in the Rush Urban Framework Plan including prioritising the civic quarter is raised in submissions.

Create more accessible age and disability appropriate recreation areas to cater for targeted ages and abilities such as skate parks, multi-use games areas, adaptable equipment, outdoor gym equipment, and early years playgrounds in areas based on community need. Initiatives include intergenerational spaces, pedestrian priority, neighbourhood mapping led by children, community gardens, street art, junk yard playgrounds, climbable objects inherent in local estates, safe street lighting, play streets temporarily closed to through traffic to allow communities to use the space while reducing air pollution and traffic danger. Submission referred to creation of a community hub at The Brook Donabate.

Some submissions received in relation to Howth, Balbriggan, Balrothery and a number of rural villages note that the intrinsic historic character of town/village centres, their architectural heritage and stress that the sense of place should not be compromised by public realm works, and piecemeal development. The views of the Department Tourism Culture, Arts, Gaeltacht Sport and Media in this regard are noted.

Urban Regeneration

Submissions refer to the 'Town Centre First Strategy' in the Programme for Government: Our Shared Future and its role in the regeneration of towns and villages post-Covid-19. Submissions indicate that Town and Village Renewal Schemes should be leveraged to bring vacant and derelict sites in town centres back into commercial and residential usage and consideration given to appointing Town Centre Officers and/or Management Teams to assist property owners and to drive implementation of plans for each town. Reference is also made to 'Lusk Vision 2030 Project' as a welcome innovation to develop a community-led vision for Lusk through the collaborative creation of a town Action Plan. It is suggested that strategies and design principles be integrated into the Development Plan.

Fingal County Council must work constructively with the Land Development Agency so that vacant and brownfield sites that are suitable for residential development can be brought into use quickly.

Multiple submissions noted the role of a high-quality public realm in stimulating economic activity while others emphasised the need to foster greater social inclusivity. A submission from IBEC notes that the rejuvenation of public realms must provide for the reimagining of town and village centres to respond to developing trends such as remote working and the impact of online retail on our town centres post-Covid-19.

Similarly, Failte Ireland's submission highlights the growing importance of outdoor experiences and requests that the planning and delivery of public realm projects and wider redevelopment be multi-faceted with high quality urban design and multi-functional use of buildings and outdoor spaces and local markets in order to maximise the economic benefits across multiple sectors, including tourism.

The importance of remote working and the need for dedicated floor space to cater for community work hubs is raised in a number of submissions, relating to both rural and urban areas. Reference is made to measures outlined by Government in relation to transforming rural Ireland post Covid-19 and emphasising the revitalisation of rural communities. Submissions refer to the need to deliver Smoke free towns and the need to ensure that that residential uses do not encroach on Town and District Centre land use zoning.

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The Town and Village Renewal Scheme should be leveraged to bring vacant and derelict sites back into commercial and residential usage. Consideration to be given to appointing Town Centre Officers and/or Management Teams to assist property owners and to drive implementation of plans towns. Derelict sites in Main St Rush identified in a number of submissions.

‘Living over the shop’

To combat vacancy and promote rejuvenation of town and village centres, submissions call for the promotion of ‘Living over the shop’ initiatives in the Development Plan.

‘15 Minute City Concept’

A number of submissions, including from Dublin Chamber, noted the ‘10/15 Minute City concept’ (whereby daily requirements of a settlement can be reached within 15 minutes by foot, bicycle or public transport) and called for an exploration of the concept in the Development Plan with a strategy for promotion across settlements in Fingal including Skerries and Malahide.

Reference was made to ‘Dublin: The 15 Minute City’ and the merits of creating a 15 Minute City, across the four Local Authority areas, to enhance the liveability of Dublin and lead to a reduction in traffic congestion and pollution, enhanced public spaces and local economies. Submission noted that LAPs and SDZ high density schemes could act as mechanisms to facilitate the concept.

HSE also calls for 20-minute neighbourhoods in larger urban conurbations.

Existing Residential

Concerns were raised in relation to issues of quality, soundproofing, density, lack of car parking and failure to comply with Building Regulations. The need for retrofitting and insulation programmes to ensure improved BER standards with regard to housing stock was also raised. The need to avoid standard suburban design in housing estates, including social housing schemes was recommended. Submissions called for the floor areas of housing units to be reviewed post-Covid -19, including common areas so that apartments could be viewed as ‘forever homes’.

The need to avoid gated communities was raised as a concern.

Submissions were supportive of housing for all including disadvantaged groups, the elderly, lone parents, those with disabilities and in situations where a live-in carer is required.

Greater housing choice for retired people was requested in numerous submissions, as was a request to explore the requirement for retirement villages. Submissions also called for a new zoning objective specifically for housing for the elderly and to ensure the Development Plan actively promotes the delivery of elderly care facilities. Care facilities and suitable housing options for those living with Dementia was also raised.

Concerns were expressed in relation to institutional buyers in the marketplace as was the phenomenon of bulk buying. The low level of properties available to rent was raised as a concern and conversely, the over-supply of rental properties in the market was also highlighted. Calls were made for the ending of preferential tax treatment for REITS.

Submissions also refer to unfinished estates and the impact on the character of existing villages.

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Housing Typologies

Multiple submissions called for greater housing choice and mix of typologies in housing schemes. Criticisms were raised in relation to the dominance of three-bedroom units where a mix of studio, 1, 2 and 4 bed units are required to meet downsizing or trading up purposes. Conversion of commercial buildings and subdivision of larger, older housing stock to multi-unit schemes was also raised. A submission from the Fingal Environmental Health Service recommends that housing/residential development is made up of a variety of household types, tenures and typologies, thereby creating a range of lifestyle, affordability and lifespan choices.

While some submissions raised concerns in relation to the number of apartments being built preferring the traditional form of two storey housing, other submissions recommended the building of higher density apartments to meet compact growth targets and to curtail urban spread.

Housing for Older People

Submissions called for the facilitation of older people who wish to downsize within the community by relocating to smaller housing units or by the subdivision of larger housing. There was a call for ground floor units within schemes to be reserved for older people or those with accessibility issues. Numerous submissions also referred to assisted living within the community, age-friendly housing within 10 minutes of town centres, sheltered housing or step-down facilities, independent and semi-independent living. Submissions also requested a new zoning objective specifically for housing for the elderly and to ensure the Development Plan actively promotes the delivery of sufficient elderly care facilities. The view was expressed that the Covid-19 pandemic has demonstrated an over-reliance on nursing home settings for our older population. Care facilities and suitable housing options for those living with Dementia was also raised.

Housing for Persons with Disabilities

Submissions indicated that there was insufficient choice or availability of housing for persons with disabilities. Within housing schemes, ground floor accessible units should be reserved for the elderly and those with mobility issues.

Social Housing

Multiple submissions refer to the use of public land to build public houses and the adoption of land use policies which deliver social and affordable housing at a sufficient scale. A view was expressed that the availability of office space in Dublin City and Fingal as a result of post-Covid-19 work practices presents opportunities for social housing.

Submissions advocate a cost-rental model for social housing to maximise use of available land banks and to ensure that public housing assets remain in public ownership. Submissions were also of the view that where public land is transferred to developers via disposal, the Council should seek in return part of the resulting development as cost-rental housing to either an Approved Housing Body, or pending future legislative provisions, the Council itself. Disposal of publicly owned land should preclude future sale of any part of the resultant development to Real Estate Investment Trusts.

Submissions called for a move away from a reliance on the Housing Assistance Payment, expanding the role of cost-rental, and for the 'Vienna model' to be explored.

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Other measures include the promotion of voluntary step-down housing schemes for older people, the need to ensure that vacant social housing is turned around and re-let as a priority and that the Local Authority commission a variety of designs for Social and Affordable Housing suitable for a number of settings, contexts and needs.

Submissions also referred to a requirement for public consultation in relation to significant public housing proposals.

One submission called for a review of all social housing types in Ongar.

Affordable Housing

There was general welcome for Fingal County Council's affordable housing scheme at Dun Emer, Lusk. Submissions stressed the need to be more ambitious in terms of numbers and speed of delivery. The provision of affordable housing was raised in numerous submissions relating to Fingal's rural villages and other settlements. The use of residentially zoned public land to build homes that are affordable to rent or buy was supported. To better facilitate social and affordable housing demand, a submission proposes land be designated as 'Discounted Affordable Home Licensed Land' which would be licensed to builders and developers in small lot sizes of 50 no. sites with capped house prices

Direct Provision and Homelessness

Submissions call for an end to Direct Provision as a form of accommodation and for solutions to end homelessness. TUSLA Child and Family Agency requests the need for supports/services for marginalised young people, those who are homeless or living in family hubs/hostels or at risk of homelessness.

Traveller Accommodation

Submissions were received requesting that culturally appropriate Traveller accommodation be addressed in the Draft Plan and that all funding in relation to Traveller accommodation is availed of.

Rural Housing

Submissions call for a review of the Rural Settlement Strategy; the criteria relating to approval of one-off housing and measures to ensure that genuine rural housing needs and the housing requirements of farming families are provided for. Submissions also state that the strategy is overly restrictive in relation to housing provision on larger farm holdings (200-300+ acres).

Numerous submissions refer to the need to re-examine Rural Cluster (RC) zoning, the criteria for establishing same and the extension of this designation as a means providing for housing choice, supporting the rural communities and services, facilitating remote working and preventing sprawl. Submissions also called for the RC zoning to be removed in some instances and for the Sustainable Rural Housing Guidelines to be updated.

Concerns are raised that some communities are impacted significantly by current Development Plan policies on noise and air safety. It is stated that rural living has become unsustainable both for agricultural operations and for habitable purposes. Close family members are in effect being excluded from the area. Submissions call for a future needs study with a view to creating a new rural environment adjacent St. Margarets, outside of noise zones. It is suggested that consideration be given to the development of lands within Thornton Hall to provide alternative housing options.

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Separately, submissions stated that uncertainty in relation to the future of Thornton Hall gives rise to concerns locally.

Other submissions call for an end to one-off housing and ribbon development and the focusing of rural housing in villages and settlement clusters.

Reference was made in submissions to the decline and underinvestment in rural villages and need for incentives to regenerate same. Reference is made to the Government announcement regarding transforming rural Ireland post Covid-19, placing emphasis on revitalising rural communities and establishing remote working facilities to attract new residents. An urgent requirement to ensure affordable housing in rural villages was also raised as was the piecemeal, car-based expansion of rural settlements which detracts aesthetically and contributes to unsustainable commuting patterns.

The potential of converting rural buildings to residential uses was also raised with similar policies adopted by Meath Co. Co. noted.

Submissions also called for greater opportunities for those who wished to pursue a rural lifestyle and for the Development Plan to provide specific objectives for serviced sites. A high standard of design with regard to rural housing and particularly with regard to housing in proximity to the coast was also raised.

Recommendations made in a submission by the Irish Farmers Association are also noted, including that agricultural developments remain free from development charges, that measures are introduced to address the decline of rural villages and that measures are introduced to protect the agriculture, equine, horticulture and forestry industries.

Educational Facilities

All submissions in relation to social and community infrastructure are noted. A number of submissions were received in relation to the provision of social infrastructure including new primary and post-primary schools, adult education and further training facilities. Submissions received in relation to new and extended school facilities in areas including Meakestown, Skerries, Rush, Balbriggan, Hollystown, Balrothery, Dublin 15 stressed the importance completing such facilities ahead of additional housing development. The need for LAPs to adopt a strong commitment to school provision and to engage proactively with the Department of Education in identifying additional school places and reviewing school capacity was also called for.

Submissions calling for amendments to map based objectives for schools were also received.

The submission from the Department of Education is welcomed. The submission requests inter alia, that the Development Plan is explicit in supporting provision of school accommodation, including policy objectives on the provision of new and protection of existing schools including in LAPs, replication of the Community Infrastructure zoning objective in the new Plan, explicit provision for school development to meet that projected population growth in existing built-up areas; inclusion of buffer zones and land use designations to support educational development adjacent existing and established schools; support for urban-design as per Guidelines; actively facilitate the principle of permitting schools in multiple zoning categories; use of Technical Guidance Documents on school site identification and suitability assessment; identification of synergies with public and commercial bodies in school site identification; consideration of school capacity in determining suitability of lands for residential purposes; phasing arrangements and a co-ordinated approach to plan formulation in trans-boundary settlements.

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A submission from the Department of Further and Higher Education, Research, Innovation and Science (DFHERIS) is welcomed. Further education, training and higher education are essential elements of both regional and national development and economic growth, as well as providing an accessible pathway to higher education. The upgrade and expansion of existing educational facilities and the consolidation of resources to facilitate the sustainable growth of settlements and in limiting the need for unnecessary travel.

Submission from Dublin Dun Laoghaire Education and Training Board is also welcomed and highlights the lifelong learning needs of the County, the need to build capacity for Further Education and Training and requirements for additional Further Education Training campuses and new Outdoor Education and Training facilities. Submission suggests that Fingal Council map existing DDLETB/FET campuses and other learning sites, centres or organisations to benchmark where learning, education and training provision already exists.

A submission seeks the provision of a third level college in Balbriggan.

Libraries

Submissions raise the need to provide additional and extended library facilities within the County including longer opening hours, expanded library services including a range of material accessible to persons with a visual impairment.

Faith Based Facilities

Submissions refer to the need to provide for Faith-based facilities throughout the County including in Dublin 15 and Donabate/Portrane. Submissions identified a shortage of land suitable for community groups and religious groups in the Dublin 15 area. BETINA church on Powerstown Road is identified as a community religious facility of notable merit.

Childcare Facilities

As part of a holistic approach, many submissions called for childcare provision at the early stages of development. In general, the high cost of childcare was also raised as a concern.

Health and Health-Care:

A submission from the Environmental Health Service under Healthy Ireland is noted and welcomed. The submission indicates that strategic planning can protect population health and the built environment and that opportunities should be explored to maximise health gain. The submission points to health measures which should be incorporated when proposing residential and commercial communities e.g. travel plans and recreational amenities to promote physical exercise.

Expanded and community health care facilities including a health care campus (Epilepsy Care Foundation) is raised in submissions, together with the need to ensure that the Development Plan makes provision for health and social service provision in Fingal, primary care centres, hospital day supports, doctor surgeries, respite centres and supported living. Submission from the HSE notes the mandatory requirement for the Draft Plan to make provision for health and social service provision in Fingal and notes that stakeholder engagement is critical in planning for the anticipated demand for such care facilities for all sectors of society within Fingal and with specific reference to the rapidly growing communities of Blanchardstown, Mulhuddart, Swords and Balbriggan. In this context, consideration is requested for the incorporation of alternative care facility options in high density SDZ and SHD areas.

Community Facilities

Provision of Community Centres and facilities to support and act as a focal point for local communities was raised in a number of submissions, including at locations in Howth, Sutton, Lusk, Kinsaley, Meakestown, Rush and the extension of existing facilities in Donabate Portrane. The use of floor space within existing DART

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stations at Bayside and Clongriffin as a community resource and appointment of a station master with a remit to be as creative as possible both inside and outside the stations was also raised, as was the perceived deficit in community arts, music and performance facilities in the County with some submissions suggesting vacant building could be utilised for arts related pop-up's.

Provision of toilets at DART stations was also noted in submissions.

Burial Grounds

Numerous submissions were received with respect to the expansion of existing cemeteries including in Balrothery, Castleknock, Blanchardstown, Lusk, Rush, Whitestown, Donabate, Blanchardstown and Castleknock. The installation of Columbarium walls was also raised.

Open Space and Amenities

A substantial number of submissions highlight the need to protect existing trees and planted areas, to provide additional tree planting, woodland areas, urban forests, re-wilding initiatives, community gardens, pocket parks and mirco-gardens close to settlements. Greater involvement by residents in pocket park design/management and biodiversity input is also sought. The need for more parks and green spaces across the County is detailed in numerous submissions, while also requiring that existing parks and green spaces are protected and enhanced and that additional facilities are provided such as seating, Calisthenics equipment, BBQ areas, bins, drinking fountains, toilets (including gender neutral facilities) and bicycle parking. Additional lighting and longer opening hours are also requested. This is particularly pertinent in the aftermath of Covid-19 pandemic and many submissions acknowledge the importance and contribution of parks and open spaces to general well-being and mental health.

A number of submissions request additional dog off-leash and walking facilities within Fingal.

A substantial number of submissions refer to existing playgrounds and while welcoming the extended provision of such facilities across the County, additional facilities and extensions to existing playgrounds are required. Facilities including sensory trails and 'Picture Exchange Communications Systems Boards' to assist children with autism and those with communication difficulties are also requested. Multiple submissions refer to a deficit in facilities for teenagers and young people with age-appropriate and universally accessible recreational amenities suggested including skate parks, multi-use games areas, adaptable equipment, running tracks and outdoor gym equipment. Other facilities referred to (including in submissions from children) include zip lines, dirt tracks, basketball courts, bowls, tennis facilities and beach volley ball. Submissions also point out that non-sporting related facilities should be provided to cater for different interest groups and should include art hubs, dance and youth centres/youth cafes and graffiti walls. Other submissions call for EV charging points. A requirement for sensory trails and provision of sensory gardens was also raised in submissions.

One submission refers to measures to support safer spaces for women to exercise and recreate. Use of parks out of normal opening hours such as for mid-night leagues, provision of strip lighting for joggers at night time and promotion of initiatives such as ParkRun and 'Passport for Leisure' were also raised in a submission.

Submissions raise questions in relation to the management of open space and call for the dedication of percentages of green space areas as wildlife habitats and point out that the planting of trees in rows within heavily mown grass does not constitute sustainable management. Increased investment in the resource and maintenance of parks was called for including the upgrade of Tolka Valley Park, Seagrang Park, Racecourse Park; development of Ward River Valley Park, maintenance of access to the Deerpark, Howth, Baltray Park, Kenure Park. A submission calls for parks to be funded as parks and not solely as grounds maintenance of Demesne houses.

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Numerous submissions called for additional parks and open spaces across the County including at Knockdromin, Lusk, Commons, Portrane, Ballyboughal, St Margaret's, Naul, Rowlestown, Clonsilla, and the upgrading of the open space at St Catherine's Rush and Dunsink Landfill. Multiple submissions request the handover of Class 1 open space in Lusk. Lack of suitable parks in the Clonsilla area is raised as a concern and concerns are raised that Beech Park and Millennium Park have a deficit of amenities including toilets, baby changing areas, coffee shops, and weather shelters. Submissions refer to the high number of playing pitches vis-à-vis other facilities.

Submissions seek the acquisition of Turvey Golf Club to restore historic parkland, the creation of Linear Parks at Balbriggan; by the Liffey at Strawberry Beds incorporating access to St Catherine's and Waterstown parks and by the Brook stream Rush. Submission also seeks the restoration of historic greenhouses.

Other submissions focus on the use of Glebe Park community garden as a children's natural play pocket and for the use of senior citizens; for the preservation of the lands between Seabury Estate, Killeen Estate and Millview Estates Malahide and as well as the preservation of Sonesta Green.

Multiple submissions expressed support for Greenways and cycleways including the proposed Fingal Coastal Way as well as the provision of stop off points and areas of interest along the route. A link from Balrothery to Argillan was also requested. Submissions also raise the provision of a rural Greenway network connecting rural villages with larger urban centres.

Submissions noted that appropriate levels of public open space must be provided as part of residential schemes and that the option to make a financial contribution in lieu of public open space should not be permitted. A small number of submissions also raised concerns in relation to perceived conflicts in policies between the provision of open space, the achievement of densities and inclusion of SuDs features, where such areas must be discounted from overall open space provision.

A number of submissions also reference the provision of small amphitheatre style spaces in new developments and the need for multi-use outdoor spaces to accommodate exhibitions, dance/gymnastics performance space.

Allotments/Community Gardens

Submissions call for an increase in the provision of small community gardens and allotments in proximity to residential areas which would encourage inter-generational socialisation as well as provide for healthy past-times, educational and volunteering opportunities. Re-wilding initiatives should be increased throughout the County and a submission calls for the promotion of gardening through education. The promotion of organic regenerative agriculture initiatives on publicly owned lands is also requested.

Empowerment of local communities to boost biodiversity in their local area e.g. by way of Tidy Towns/Environmental Groups also arose in submissions received.

Coastal Recreation

A significant number of submissions highlight the need for additional coastal infrastructure to support year-round swimming and water-based recreational activities in areas including Balbriggan, Rush, Baldoyle, Howth, Loughshinny and Malahide. The growth in sea swimming and other coastal pursuits in recent times is recognised and submissions call for increased provision of support infrastructure such as swimming platforms, slip ways, storage facilities, marinas, car parking, floating pontoons, tidal pools, showers and changing areas/toilets. Submissions raise the inherent tourism and economic benefits of promoting Fingal's coastal

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resources the promotion of water recreation and the need for 'Blue Flag' status on beaches with additional water quality testing and quality assurance.

Ensuring universal accessibility to public beaches was raised in a number of submissions as was a requirement for life guard surveillance. A requirement for enhanced coastal management and the importance of the coastal resource as contributing to Healthy Placemaking RSES Objective 1 was also noted in a submission.

A number of submissions were also received with respect to the provision of indoor swimming facilities at locations across Fingal, including Dublin 15, north-east Fingal, Swords, Donabate/Portrane, Balbriggan and Lusk. Some submissions raise the point that a swimming pool should be provided based on population thresholds.

Sports and Recreation

While the requirement for more parks and recreational amenities across Fingal was detailed in multiple submissions, a significant number also detailed the need for active recreation, including playing pitches, running facilities, cycle-tracks and all-weather facilities to meet the growing demand across all sporting codes and activities in Fingal.

Submission from Cumann Luthcleas Gael Coiste Átha Cliath including support for DMS57 and strengthening of DMS61 is noted. Other submissions make the point that recreational facilities should be broadened beyond the provision of GAA and soccer codes to other sports, ensuring inclusivity across all sporting communities.

The role of sport in the community and the importance of having sporting facilities in proximity to residential areas was also highlighted. The prioritisation of completion of the Recreational Hubs across the County including in Lusk, Rush, Naul, Bremore Regional Park, St. Catherine's Park (Rush) Donabate, Mooretown/Oldtown (Swords), Drinan, Baldoyle Racecourse Park and The Phoenix Park was also raised. Additional open space and recreational facilities were also called for in areas including St. Margaret's, Dublin 15, Skerries, Rush and the requirement for an integrated plan for Hollystown Park, Demesne, Golf Club and Kilmartin LAP. The retention of Objectives Hollystown 1 and 2 in the new Development Plan were also requested. Numerous requests for a bike track similar to that provided in Corcagh Park were received.

A submission called for a review of the opening and closing times of Phoenix Park gates.

Webinar 1: People & Place

All issues raised within the People and Place Webinar have been considered throughout this report.

During the webinar, a wide variety of issues were raised including reference to specific plans for towns, the provision of Faith-based facilities, Howth SAAO, measures to ensure housing choice, provision of housing for older persons including in established communities, delivery of social facilities, provision of amenities for young people close to home, the importance of public realm, rural placemaking, projected housing need.

CHIEF EXECUTIVE'S RESPONSE

A Vision for Fingal

The content of submissions referring to the above aspirations are welcomed. Fingal County Council supports in full the principles of sustainability, healthy placemaking and climate action, and will seek to enshrine policies and objectives in the Draft Fingal Development Plan 2023-2029 which allow for the sustainable growth of the County while preserving those qualities which align with the Council's Vision – 'Fingal a great place to live

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work, visit and do business'. The Draft Plan will align with the NPF, the RSES and the MASP. The Draft Plan in seeking to ensure consistency with the NSO's of the NPF will also seek to ensure alignment with the UN Sustainable Development Goals in areas such as climate action, clean energy, sustainable cities and communities, economic growth, reduced inequalities and innovation and infrastructure, as well as education and health.

Core Strategy

The Planning Authority will ensure that the Settlement Strategy aligns with the NPF, RSES and MASP. The review process will be informed by a robust evidence-based approach in formulating the Core Strategy for the County in line with the NPF and as part of the Local Authority's overall HNDA and noting Section 28 Guidelines on Housing Supply Target Methodology and the transitional population projections methodology in the NPF Implementation Roadmap and Circular FPSO4/2018 relating to the preparation of HNDA.

Compact Growth

The Council recognises the principles of sustainable growth embodied in the NPF and RSES and the need to secure more compact urban development patterns with specific targets for the delivery of new homes on infill and brownfield sites within existing urban areas. The Chief Executive recognises the principles of sustainable growth embodied in the NPF and RSES and the need to secure more compact urban development patterns with specific targets for the delivery of new homes on infill and brownfield sites within existing urban areas.

The Council has commissioned an Urban Capacity Study which will be carried out to inform plan preparation; assist in identifying correlations between development sites and infrastructure provision and will inform policy formulation in the Draft Plan. The Plan will also include appropriate policies and objectives to promote a compact urban form including higher densities and will identify appropriate locations including strategic development areas where such density can be optimised.

In addition, the Draft Plan will include objectives for the establishment of a database of strategic brownfield and infill sites to support the implementation of active land management.

The integration of transport and land use planning with a sustained focus on sustainability mobility including active travel to reduce reliance on the private car will form a key component of the Draft Plan and Fingal will continue to engage and collaborate proactively with the NTA, TII and other relevant stakeholders to identify infrastructural and other measures which will contribute towards a sustainable modal shift.

Population Projections and Housing Targets

The Chief Executive acknowledges the statutory provisions set out under Section 10(2)(A) of the Planning and Development Act 2000 (as amended) that requires the new plan to be consistent with inter alia the NPF, the RSES and associated MASP. The higher-tier planning policy framework will inform the preparation of the Core Strategy and the Draft Fingal Development Plan 2023-2029.

The framework for the Draft Core Strategy as set out in Part 1 of this report demonstrates that the Draft Plan will place a focus on the delivery of the identified strategic development areas within the MASP while also providing for increased densities, reduced vacancy and the re-use of underutilised lands.

The NPF NPO 37 provides for a Housing Need Demand Assessment (HNDA) to be developed by each local authority to support the preparation of housing strategies and all related housing policy outputs, e.g. City and County Development Plans. The HNDA is to be undertaken by local authorities with coordination assistance to

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be provided by the Regional Assemblies and also at a metropolitan scale, particularly where inter-county and inter-regional settlement interactions are to be planned for and managed. As set out in the NPF, there are a number of key evidence inputs which inform and drive the HNDA model, including information on demographic, affordability and wider economic trends, coupled with a profile of existing housing stock and its management. Fingal County Council will take account of all current data on population and housing including CSO and ESRI in preparing the HNDA, to ensure the critical housing needs of Fingal are reflected in Plan.

Recent national guidance including the Housing Supply Target Methodology for Development Planning – Guidelines for Planning Authorities will also be complied with. The data set out in the guidelines will underpin the Core Strategy in the Development Plan.

Household Formation

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. It is acknowledged that future household size comprises an important factor in the calculation of the overall housing target for the Core Strategy and as such analysis of same will comprise a key determinant in preparation of the Draft Plan.

Strategic Residential Locations

The Planning Authority will ensure that the Settlement Strategy aligns with the NPF, RSES and MASP. The review process will be informed by a robust evidence-based approach in formulating the Core Strategy for the County in line with the NPF and as part of the Local Authority's overall HNDA and noting Section 28 Guidelines on Housing Supply Target Methodology and the transitional population projections methodology in the NPF Implementation Roadmap and Circular FPSO4/2018 relating to the preparation of HNDA.

The Council acknowledges the need to support and strengthen residential, commercial, social and community uses across the County and to ensure the liveability and attractiveness of the Fingal area. The Draft Plan will be informed by the RSES which includes a detailed Metropolitan Area Strategic Plan (MASP) which identifies strategic development and employment areas for population and employment growth in addition to more generalised consolidation and re-intensification of infill, brownfield and underutilised lands within the region and Fingal. The MASP (and the wider RSES) directs future growth to identified Strategic Development Areas and Corridors located on existing and planned strategic public transport corridors. Regarding strategic residential landbanks, it is envisaged that the Plan will seek to strengthen the approach adopted under the current Development Plan and identify key areas in the County that are appropriate for residential and mixed-use development. The plan will propose appropriate guiding principles for the future development and enhancement of such areas in accordance with the principles of compact growth.

Proactive active land measures such as provision of LAPs and masterplans will be recommended to ensure delivery of appropriate development on such sites.

The Council has also commissioned an Urban Capacity Study which will be carried out to inform Plan preparation; assist in identifying correlations between development sites and infrastructure provision and will inform policy formulation in the Draft Plan. The Plan will include appropriate policies and objectives to promote a compact urban form including higher densities and will identify appropriate locations including strategic development areas where such density can be optimised.

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Town Centre Development

The regeneration of our towns and villages will be an objective of the new Plan and recognition of the Town Centre First Strategy in the programme for Government, Our Shared Future and its role in regeneration of towns and villages post-Covid-19 is acknowledged. Funding has been recently received for 2 no. regeneration projects in Swords and Balbriggan which will be flagship projects for the County.

Regeneration and healthy place-making will be key factors when preparing the new Plan in order to ensure that we create healthy and attractive places to live and work and to ensure that lands are used to their full potential. Initiatives such as public realm planning will also support towns in garnering local community spirit and improving the public areas making towns more attractive for businesses and tourism.

Engagement with the Economic Development Section and other relevant stakeholders will be imperative for the formulation of policies and objectives regarding all aspects of economic development in Fingal.

The Plan will seek to ensure the growth of Fingal's villages in a sustainable manner in line with national and regional policy.

The removal or addition of map-based objectives will be examined in the preparation of the Plan. The Draft Plan will also seek to increase employment in strategic locations, providing for people intensive employment at sustainable locations near high quality transport nodes, building on commercial and research synergies in proximity to large employers and activating strategic sites to strengthen the local employment base in self-sustaining towns and self-sustaining growth towns in accordance with RSES.

The Draft Plan will continue to support retailing and service provision in Fingal's Major Town Centres.

Building Heights and Density Standards

The Urban Development and Building Heights Guidelines for Planning Authorities, December 2018 provides national planning policy guidance on building heights in relation to urban areas. The document contains Specific Planning Policy Requirements (SPPRs) relevant to the preparation of Development Plans and strategic planning, in particular SPPR 1, SPPR 2 and SPPR 4.

The current Fingal Development Plan provides explicit guidance in relation to Development Management under Chapter 12 including on quantitative standards, daylight, sunlight, overshadowing, acoustic privacy aimed at safeguarding residential amenity.

The Design Standards for New Apartments – Guidelines for Planning Authorities (March 2018) also introduced SPPRs in relation to apartment design which will be incorporated in the Draft Development Plan.

RPO 3.3 of RSES states that delivery of increased residential densities should be in line with a suite of guiding principles provided in the RSES and in the following planning guidelines:

- 'Sustainable Residential Development in Urban Areas', 2009
- 'Sustainable Urban Housing; Design Standards for new Apartments Guidelines', 2018
- 'Urban Development and Building Heights Guidelines for Planning Authorities', 2018.

The Draft Plan will seek to encourage densities commensurate with national and regional policy objectives and Planning Guidelines issued under Section 28 of the Planning and Development Act 2000 (as amended). Guidance/development standards ensuring such development is delivered in a manner which protects amenities will be updated and strengthened.

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Community Engagement

The Council is committed to establishing clear and open channels of communication between the community it serves, its Elected Members and Executive. This is reflected in the Fingal County Council Corporate Plan 2019-2024 where it is a Strategic Objective under Theme 1 Quality of Life to 'engage and consult with citizens and stakeholders in a way that allows their views to be taken on board, through the use of both statutory and non-statutory processes'.

Social Inclusion

All Fingal Co. Co. Departments remain committed to carrying out a wide range of programmes and services to ensure social inclusion and access for all.

Successful Placemaking

Ensuring sustainable and integrated settlements, both urban and rural is a cornerstone of placemaking and is a principle which is enshrined in both the NPF and RSES. The current Plan includes a comprehensive section on Placemaking and includes a suite of guidance and objectives aimed at protecting and enhancing the environment, open space provision and encouraging high quality design of both the built environment and public realm. The Draft Plan will continue to support these objectives to ensure a holistic approach and will include additional specific objectives in relation to healthy placemaking and promotion of opportunities for physical activities. Measures to ensure the integration of new and existing communities, the identification of lands for social and community facilities, integration of transport and land use planning and plan led development will be examined in the new Plan.

Safer Living Environment

All submissions in relation to safer living environments are noted. The provision of Garda stations falls under the remit of the Minister for Justice and is not a matter for consideration in the Development or for the Local Authority. Issues in relation to anti-social behaviour and control of intoxicating liquor are policing matters.

Protection of Greenbelts

The importance of preserving greenbelts is recognised. The current Development Plan requires that towns and villages are supported by a greenbelt policy to safeguard the innate rural value of Fingal's countryside; to ensure that existing urban areas within Fingal do not coalesce and to ensure that citizens can enjoy the visual and natural amenities of the countryside. This position will continue to be supported in the new Development Plan.

Fingal's important and multi-faceted agricultural economy and its importance to the life of the County is fully acknowledged.

Public Realm

In terms of public realm improvements, Fingal County Council is actively reviewing requirements in relation to its towns and villages, particularly following the Covid-19 pandemic. Public realm improvements, landscaping and other enhancements have been carried out in recent times including the provision of seating, litter bins, public toilets. An audit/GIS layer is being developed which could provide an interactive facility to map facilities across the County and identify deficiencies in provision. The need for amenities such as community gardens, playgrounds, tree planting, improved lighting, exercise equipment continues to be reviewed and delivered by numerous Council Departments.

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A number of studies are underway including Sustainable Swords and Swords Cultural Quarter which will provide for significant public realm improvements and work will continue in relation to enhancement measures identified under initiatives such as Urban Framework Plans.

Urban Regeneration

Strategic Policy No. 8 of the current Plan seeks to 'promote the vibrancy of town centres by providing for a mix of uses, including cultural and community uses and upper floor residential as appropriate'. Town centre rejuvenation and Objective PM36 seeks to 'encourage appropriate residential, social and community uses in town and village centres in order to enhance their vitality and viability and recognising diversity of communities and actively promote these uses in existing under-utilised or vacant building stock as a mechanism to combat vacancy in town centres'.

Regeneration and healthy place making will be key factors when preparing the new Plan in order to ensure that we create healthy and attractive places to live and work and to ensure that lands are used to their full potential. Initiatives, including public realm planning will also support towns in garnering local community spirit and improving the public areas making towns more attractive for businesses and tourism. Engagement with the Economic Development Section and other relevant stakeholders will be imperative for the formulation of policies and objectives regarding all aspects of economic development in Fingal.

'Living Over the Shop'

Objectives to encourage the active use of upper floors within commercial buildings will be encouraged.

'15 Minute City Concept'

Given Fingal's settlement hierarchy ranging from small rural villages, rural clusters, key towns and larger urban centres, it is considered that all components of the 10/15 Minute City model concept may not be supportable across all settlements. The underpinning principles of the model however, including compact development, mixed use development, increased urban densities, high quality urban environments, provision of sustainable travel modes and high levels of access to quality public transport are to the fore of good planning and successful placemaking and will continue to be supported in the preparation of the Fingal Draft Development Plan.

The promotion and rejuvenation of town and village centres will be actively promoted in the Development Plan, and to align with national and regional planning policy with regard to compact growth and sustainable development.

Existing Residential

Issues in relation to construction quality, sound proofing, non-compliance with Building Regulations, retrofitting and BER are not issues for the Development Plan. The current Plan contains a suite of guidance measures under Chapter 12 Development Management in relation to quantitative and other standards which will be updated and supported in the Draft Development Plan.

Measures to protect the amenities of established developments will be similarly updated in the Draft Plan. Floor areas, residential unit sizes, car parking and other standards such as open space and storage facilities for new homes are governed by national guidance issued under Section 28 of the Planning and Development Act 2000 (as amended) including

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- 'Sustainable Residential Development in Urban Areas', 2009
- 'Sustainable Urban Housing; Design Standards for new Apartments Guidelines', 2018
- 'Urban Development and Building Heights Guidelines for Planning Authorities', 2018.

Objective DMS32 of the current Development Plan seeks to prohibit proposals creating gated communities. This policy will continue to be supported in the Draft Plan.

It is intended that Chapter 3 Placemaking – Design Criteria for Residential Development will be strengthened as necessary, in the Draft Plan in order to align with the requirements of national and regional policy and planning guidance.

The Development Plan will include objectives supporting a wide range of housing typologies, unit sizes and tenure.

National planning guidance with regard to Co-Living schemes will be complied with.

Housing Typologies

In relation to increased housing choice, the Draft Plan will examine opportunities to provide for a range of housing options, including housing for older members of the community. The HNDA will inform Development Plan policy responses about the future location, typology and tenure of housing needs, which in turn will inform the provision of a sufficient land supply in the right locations to deliver future additional housing.

Housing for Older People

The Draft Plan will examine opportunities to provide for a range of housing options, including housing for older members of the community.

Both the NPF and the RSES include policy objectives supporting the provision of age friendly communities and downsizing opportunities. In 2019 the Government published 'Housing Options for Our Ageing Population Policy Statement' which acknowledges the changing demographics of the country and the change in housing needs for older people. The Fingal Age Friendly Strategy 2018-2023 incorporates international, national and local policy and includes Strategic Focus 3 on Housing.

Also, Objective PM40 of the current Plan seeks to 'ensure a mix and range of housing types are provided in all residential areas to meet the diverse needs of residents.'

Housing for Persons with Disabilities

Fingal County Council is committed to implementing the framework for the delivery of housing for persons with disabilities set out under the 'National Housing Strategy for People with Disability 2011-2016' (extended to 2020). The National Housing Strategy for Persons with Disabilities 2022-2027 is now being developed. Its recommendations and those of the Housing Strategy for People with Disabilities will be supported in the Draft Plan. Fingal's own construction programme will deliver a target rate of 10% units with universal design within its own new-build social housing stock. The Local Authority will continue to offer retrospective adaptations to the existing stock under the Disabled Person's Grant scheme. There are also a number of grants available to private households which assist those living with a disability including the Housing Adaption Grants, which Fingal County Council will continue to maximise.

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Social Housing

All submissions with respect to social housing have been noted in full and will inform the preparation of Draft Plan.

The conversion of third party owned office space to residential use is a Development Management matter.

The Local Authority provides social housing through a suite of options provided for in Rebuilding Ireland: Action Plan for Housing and Homelessness. These include direct builds, acquisitions, Part V, leasing and through working in partnership with Approved Housing Bodies (AHBs). Support in the form of Housing Assistance Payment is also provided.

Affordable Housing

As per RSES, the development of a new affordable 'cost-rental' sector has been identified as part of the reform of the Irish housing system. In this regard, it is recommended that the plan will include proactive policy to support local authorities, approved housing bodies and other sectoral agencies in the provision of a greater diversity of housing type and tenure, including social and affordable housing and exploring new models of low-cost rental and affordable homeownership. Consideration will also be given to supporting policies for co-operative type housing. The Development Plan will also promote Active Land Management including the Vacant Site Levy as a means to encourage brownfield development and densification.

Fingal County Council proposes to deliver affordable homes on lands in Council ownership in accordance with relevant affordable legislation as may be introduced by Government. The proposals to deliver mixed tenure housing on Council owned lands include the provision of cost rental homes.

All proposals by the Local Authority under Part XI of the Planning and Development Act 2000 (as amended), including housing schemes, are subject to public consultation and adoption by the Elected Members as a reserved function. The design of all housing proposals by the Local Authority respond to site specific criteria and end-user requirements.

A Housing Strategy will be prepared as part of the forthcoming Plan which is required to provide for the housing of the existing and future population of the area. Issues to be taken into account include the existing need and likely future need for social housing; the need to ensure that housing is available for persons who have different levels of income; the need to ensure that a mixture of house types and sizes is developed to reasonably match the requirements of the different categories of households; and the need to counteract undue segregation in housing between persons of different social backgrounds. It is intended to carry out HNDA to provide a robust evidence base to support decisions and inform policies about new housing supply, including the proportion of social housing required, the need for different types and sizes of provision, specialist housing and housing related services.

Fingal County Council proposes to deliver affordable homes on lands in Council ownership in accordance with relevant affordable legislation as may be introduced by Government. The proposals to deliver mixed tenure housing on Council owned lands include for the provision of affordable homes for purchase as well as cost rental homes.

Direct Provision and Homelessness

All submissions calling for the end of Direct Provision as a form of accommodation and for an end to homelessness are noted.

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Direct Provision as a national policy is intended to provide for the needs of those awaiting decisions on applications for international protection. This is not a matter for the Development Plan.

Fingal County Council through the Housing Department manages homelessness and social housing through a range of options provided for in Rebuilding Ireland: Action Plan for Housing and Homelessness. Appendix 1 of the current Development Plan contains the Housing Strategy which will be revised as part of the preparation of the Draft Plan, including specific social housing needs such as homelessness. In line with RSES, policies will be included in the Draft Plan to support the implementation of the Homelessness Action Plan Framework 2019 – 2021 to which Fingal is a party and the Housing First National Implementation Plan 2018-2021 under Rebuilding Ireland.

Traveller Accommodation

Objective PM09 seeks to 'Secure the implementation of Fingal County Council's Traveller Accommodation Programme 2014-2018 and to review this programme if required and/ or deemed to be necessary, during the course of the Development Plan'. Since the adoption of the current Plan, the Fingal Traveller Accommodation Programme 2019-2024 has been adopted with a review date no later than December 2021.

Rural Housing

National Strategic Outcome 3 of the NPF seeks to achieve Strengthened Rural Economies and Communities'. Additionally, NPO 15 and NPO 19 seek the following:

NPO 15 'Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.'

NPO 19 'Ensure, in providing for the development of rural housing, that a distinction is made between areas under urban influence, i.e. within the commuter catchment of cities and large towns and centres of employment, and elsewhere:

- In rural areas under urban influence, facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements;
- In rural areas elsewhere, facilitate the provision of single rural housing in the countryside based on siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.

Section 4.8 of RSES relates to Rural Places, Towns Villages and the Countryside and sets out a number of RPOs including:

RPO 4.79: 'Local authorities shall identify and provide policies that recognise the contribution that small towns, villages and rural areas contribute to social and economic wellbeing. As part of this policy provision that seeks to support and protect existing rural economies such as valuable agricultural lands to ensure sustainable food supply, to protect the value and character of open countryside and to support the diversification of rural economies to create additional jobs and maximise opportunities in emerging sectors, such as agri-business, renewable energy, tourism and forestry enterprise is supported'.

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RPO 4.80 which states that ‘local authorities shall manage urban generated growth in Rural Areas Under Strong Urban Influence (i.e. the commuter catchment of Dublin, large towns and centres of employment) and Stronger Rural Areas by ensuring that in these areas the provision of single houses in the open countryside is based on the core consideration of demonstrable economic or social need to live in a rural area, and compliance with statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements’.

Accordingly, policies and objectives relating to rural Fingal, including the rural settlement strategy will be reviewed under the Draft Development Plan to ensure consistency with national and regional planning policy on rural development and rural housing.

Educational Facilities

The submissions received in relation to education and training across the County are noted. While the provision of new schools is the responsibility of the Department of Education, Fingal County Council has and will continue to work collaboratively with the Department and with the Department of Further and Higher Education, Research, Innovation and Science in relation to the identification of suitable sites for the delivery of new and expanded educational facilities in Fingal.

Libraries

The value and contribution of libraries to local communities and the level of service provision is acknowledged. Proposals for the Swords Cultural Quarter will include the development of a new permanent library for the County town.

Faith-based Facilities

Objectives PM84 of the current Development Plan seeks to ‘facilitate the development of additional places of worship through the designation and/or zoning of lands for such community requirements’ and Objective PM85 seeks to ‘encourage and facilitate the development of places of worship in appropriate locations in urban centres and proximate to residential communities.’ Similar objectives will be promoted in the proposed Draft Plan.

Childcare Facilities

Submissions with respect to the early delivery of childcare facilities are noted. In line with Guidance issued under Section 28 of the Planning and Development Act 2000 (as amended), applications for development must ensure that appropriate childcare facilities are provided. The cost of childcare is not a Development Plan issue.

Health and Healthcare

The NPF and the RSES actively promote the provision of healthy communities. NPO26 in the NPF seeks to ‘support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan, through integrating such policies, where appropriate and at the applicable scale, with planning policy’. A key principle set out in the RSES - RPO 9.16 states that ‘local authorities shall support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan, through integrating such policies, where appropriate and at the applicable scale, with planning policies contained in development plans.’

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While the provision of health care facilities is not a matter for the Development Plan, the preparation of the Draft Plan, including extensive stakeholder engagement with internal Council Departments and external entities will assist in updating and/or developing policy objectives with regard to health care facilities ensuring that the above objectives of the NPF and RSES are promoted.

Community Facilities

Fingal currently owns and operates 15 no. community centres and has shared arrangements through the Department of Education for a further 6 no. centres as well as multiple other buildings throughout the County. Community facilities proposed for Meakestown and Baldoyle are currently at design stage and the Local Authority is actively engaging with the community in Howth to identify suitable options for community facilities. The need for additional and extended community facilities within the County is kept under active review.

The use of floor space within existing train stations and the appointment of station masters is a matter for Irish Rail. Similarly, the provision of toilets in DART stations is not a Development Plan matter.

Objective PM66 of the current Plan seeks to ‘ensure provision of accessible, adequate and diverse community facilities and services in new and established areas to provide for the well-being of residents.’ The ethos of this objective will continue to be supported in the Draft Plan.

Burial Grounds

It is acknowledged that many existing burial grounds within the County have reached or are nearing full capacity, particularly older or historic graveyards. Many are also unsuitable for Columbarium walls. Future burial requirements of the County including Columbarium walls will be accommodated by regional graveyards.

Open Space and Amenities

Fingal’s open spaces, including its public parks, its Demesne landscapes, coastal amenities, playgrounds and other outdoor facilities are prized resources within the County and Fingal County Council promotes an inclusive approach to access and accessibility.

Fingal County Council is actively increasing amenities within parks and open spaces. An audit/GIS layer will help to identify deficiencies in provision of facilities. The provision of public water fountains providing potable drinking water, additional bins and seating is being carried out by the Council’s Operations Department. The provision of Picture Exchange Communication System Boards’ (PECS) in playgrounds may be considered as part of accessible play provision. A sensory garden is currently being provided as part of the Community Garden at Skerries Mills.

Numerous requests across the County for new and extended playgrounds and other amenities including zip wires, dirt tracks skate parks, slides, MUGA’s, basketball courts, bike tracks, facilities for youth/teenagers will be assessed in the context of the adoption of the Council’s ‘Space for Play’ play policy.

The current parks and Open Space Bye-laws provide for dog off-lease areas in regional parks and town parks as required. Smaller neighbourhood and local parks have designed off leash areas.

The provision of new parks, parklets, linear parks, repurposed open space is continuously reviewed by the Local Authority with new Class 1 open space identified as part of LAP and Masterplan preparation. Good design principles of multi-functionality, inclusivity, accessibility as well as active and passive surveillance are

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incorporated into the design of new parks, playgrounds, and open spaces. Initiatives to promote the use of outdoor recreation, health and well-being and enjoyment of Fingal's many and varied open spaces are supported by the Local Authority. The high quality of Fingal's parks is recognised in the awarding of Green Flag status to Ardgillan Demesne, Malahide Demesne, Millennium Park, Newbridge House and Farm, Santry Demesne and St Catherine's park for exceeding environmental standards in green space management and excellence in visitor attraction.

The Council is currently piloting management techniques aimed at improving biodiversity and agricultural practices in the context of sustainable management approach to open space. These practices include environmentally friendly alternatives to herbicide use and grass management initiatives relating to wild flower meadows and grazing using agricultural livestock.

Additional park facilities at Beech Park, Clonsilla will open later this year and consideration will be given to improvement of facilities in Millennium Park Blanchardstown. A Conservation Management Plan for Drumanagh was adopted and works are progressing in line with the plan. Improved access from Loughshinny is being addressed in consultation with local landowners.

Multi-Departmental discussions are progressing between the Parks, Transportation and Active Travel Departments of Fingal County Council in consultation with Dublin City Council in progressing the completion of the Santry Greenway. The provision of further Greenway connectivity across the county is being actively reviewed.

The requirements for appropriate parkland and open space for Rowlestown will be addressed through the Planning and Development Management Process.

The provision for cycling in parks is permitted under Fingal's current Parks and Open Spaces Bye-laws. Infrastructure for EV charging is provided for in all new car parks developed in parks and open spaces. Retrospective provision in existing car parks is being addressed by the Council's Operations Department.

There is a requirement to ensure that the design of SuDS enhances the quality of open spaces. SuDS should not generally form part of the public open space provision, except where it contributes in a significant and positive way to the design and quality of open space. Current Development Plan policy allows where the Council determines that SuDS makes a significant and positive contribution to open space, a maximum of 10% of open space provision to be taken up by SuDs. The Council also gives consideration to the provision of SuDS on existing open space, where appropriate.

Allotments/Community Gardens

The importance of allotments, community gardens and re-wilding initiatives are recognised throughout the County and will continue to be supported in the Development Plan. The Council is supporting local community groups such as Tidy Towns and Men's Sheds to develop Local Biodiversity Action Plans with specific and tailor-made initiative and projects they can implement in line with best practice.

Coastal Recreation

The growth in popularity of coastal recreation since the arrival of the Covid-19 pandemic is acknowledged, particularly with the closure of pools and the increase in outdoor recreational activity. A review of public toilet facilities at beaches is currently taking place. The expansion of facilities must be weighed against other factors such as the safety of swimming at such locations as well as other factors including coastal management and impacts if any arising in relation to the integrity of Natura 2000 sites.

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There will be continued support for initiatives to improve water quality and to achieve 'good' ecological status.

Sports and Recreation

The findings of the Sports and Recreation Facilities Audit for the Electoral Areas of Balbriggan Swords, Rush/Lusk February 2021 will be reviewed. The requirement for additional sporting facilities across the County is kept under constant review by the Council

The provision of bike tracks in public parks will be reviewed in the context of the adoption of the Council's 'Space for Play' policy.

Negotiations are ongoing in relation to the acquisition of required lands for a Recreational Hub in Rush. The transfer to Class 1 open space in Lusk is being pursued by the Local Authority and snagging of the Open Space and playground is ongoing with the transfer expected later in 2021.

An application under Part XI of the Planning and Development Act 2000 (as amended) was successful for a Recreational Hub Facility at Bremore Regional Park, Balbriggan and plans for a future Recreational Hub at Ballymastone are progressing through the planning process. The first phase of Swords regional park located at Oldtown/Mooretown will be completed late Summer/Autumn 2021. The sports pitches at Kettle's Park, Drinan are open to the public. The planning application for Baldoyle Racecourse Park will be submitted to An Bord Pleanála in summer 2021 and work is ongoing in relation to the Phoenix Park Racecourse open space lands at Castleknock.

A review of the opening and closing times of the Phoenix Park gates is a matter for the OPW.

CHIEF EXECUTIVE'S RECOMMENDATIONS

- Promote compact growth in line with the NPF and RSES through the inclusion of specific policies and targeted and measurable implementation measures that:
 - encourage infill / brownfield development,
 - focus growth on the County's designated strategic development areas identified in the Metropolitan Area Strategic Plan (MASP),
 - promote increased densities along public transport corridors.
- Ensure that the Housing Strategy recognises the diverse needs of all of Fingal's citizens meeting, insofar as is feasible, their diverse accommodation needs.
- Accelerate the availability of lands ready for residential development by aiming to address current infrastructural deficits where these are known to be delaying residential development.
- Promote residential development addressing the current shortfall in housing provision and meeting target guidance figures, through a co-ordinated planned approach to developing appropriately zoned lands at key locations, including regeneration areas, and vacant and underutilised sites.
- Promote the provision of affordable and social housing and specialised housing including sheltered housing and housing for people with disabilities.

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- Continue to implement the Homelessness Action Plan Framework for Dublin 2019 - 2021 and support related initiatives to address homelessness, including the work of the Dublin Region Homeless Executive. Consideration will be given to a supporting policy for the Housing First National Implementation Plan 2018-2021.
- Bring forward policies which will encourage upper floor conversions into apartments.
- Support and promote social inclusion in line with national and regional policy.
- Promote policies and objectives that support the needs of an ageing population in the community with reference to housing, mobility and the public realm having regard to Age Friendly Ireland's "Age Friendly Principles and Guidelines for the Planning Authority 2020."
- Include proactive policy to support local authorities, approved housing bodies and other sectoral agencies in the provision of a greater diversity of housing type and tenure, including social and affordable housing and exploring new models of low-cost rental and affordable homeownership.
- Secure the implementation of the Council's Traveller Accommodation Programme.
- Respond to rural-generated housing need by means of a rural settlement strategy which will direct the demand where possible to rural villages and clusters, and permit housing development within the countryside only for those people who have a genuine rural generated housing need in accordance with the Council's Rural Housing Policy and where sustainable drainage solutions are feasible.
- Support and protect rural villages by appropriate sustainable development to preserve the character and viability of the villages and to support local services.
- Encourage re-use and rehabilitation of existing housing stock in rural areas in preference to new build, and actively promote the protection of traditional rural buildings.
- Existing standards, policies and objectives will be reviewed to ensure they are in line with current best practice and advice on accessibility, including the Irish Wheelchair Association's (IWA) Think Ahead, Think Housing campaign, the IWA Best Practice Access Guidelines (4th Edition) and the National Disability Authority's guidelines including "Universal Design Guidelines for Homes in Ireland" and "Dementia Friendly Dwellings for People with Dementia, their Families and Carers".
- Foster the development of socially and economically balanced sustainable communities.
- Encourage appropriate residential, social and community uses in centres in order to enhance their vitality and viability and recognising diversity of communities.
- Enhance and develop the fabric of existing and developing centres in accordance with the principles of good urban design.
- Secure the regeneration of areas in need of renewal.
- Develop, promote and implement policies and initiatives that shape and deliver quality public realm throughout the County.

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- Ensure the timely provision of community services and resources, including schools, community, religious, and health facilities, required for the creation of sustainable communities.
- Promote objectives regarding the provision of appropriate community facilities across Fingal.
- Support objectives in the Draft Plan to provide appropriate childcare facilities.
- Support community engagement initiatives and the objectives of the Fingal Corporate Plan 2019-2024.
- Continue to support and facilitate the provision of appropriate burial facilities across Fingal.
- Continue to work collaboratively with Educational and Health care providers to ensure the timely provision of educational facilities, health care and community resources throughout Fingal. The Draft Plan will support the provision of healthcare facilities in line with national and regional policy objectives.
- Continue to support the expansion and growth of libraries as key community and cultural assets within the County.
- Continue the development of a hierarchy of multifunctional active and passive recreational open spaces and facilities to serve all age cohorts.
- Support sports, recreational and play amenities in the County for all ages and abilities.

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THEME 2: CLIMATE ACTION

Submissions Received:

FIN-C377-7, FIN-C377-8, FIN-C377-13, FIN-C377-32, FIN-C377-35, FIN-C377-59, FIN-C377-61, FIN-C377-71, FIN-C377-72, FIN-C377-87, FIN-C377-92, FIN-C377-96, FIN-C377-105, FIN-C377-106, FIN-C377-110, FIN-C377-112, FIN-C377-115, FIN-C377-118, FIN-C377-119, FIN-C377-132, FIN-C377-136, FIN-C377-144, FIN-C377-145, FIN-C377-146, FIN-C377-160, FIN-C377-163, FIN-C377-167, FIN-C377-170, FIN-C377-181, FIN-C377-188, FIN-C377-200, FIN-C377-202, FIN-C377-210, FIN-C377-213, FIN-C377-225, FIN-C377-236, FIN-C377-237, FIN-C377-243, FIN-C377-249, FIN-C377-251, FIN-C377-257, FIN-C377-261, FIN-C377-263, FIN-C377-267, FIN-C377-269, FIN-C377-271, FIN-C377-274, FIN-C377-275, FIN-C377-284, FIN-C377-287, FIN-C377-294, FIN-C377-296, FIN-C377-297, FIN-C377-304, FIN-C377-305, FIN-C377-313, FIN-C377-323, FIN-C377-325, FIN-C377-330, FIN-C377-331, FIN-C377-337, FIN-C377-345, FIN-C377-352, FIN-C377-357, FIN-C377-359, FIN-C377-361, FIN-C377-376, FIN-C377-377, FIN-C377-386, FIN-C377-409, FIN-C377-416, FIN-C377-420, FIN-C377-428, FIN-C377-434, FIN-C377-438, FIN-C377-447, FIN-C377-451, FIN-C377-456, FIN-C377-458, FIN-C377-469, FIN-C377-472, FIN-C377-474, FIN-C377-476, FIN-C377-479, FIN-C377-481, FIN-C377-482, FIN-C377-487, FIN-C377-488, FIN-C377-490, FIN-C377-491, FIN-C377-493, FIN-C377-494, FIN-C377-495, FIN-C377-498, FIN-C377-500, FIN-C377-505, FIN-C377-506, FIN-C377-507, FIN-C377-508, FIN-C377-522, FIN-C377-542, FIN-C377-548, FIN-C377-550

SUMMARY OF ISSUES

Policy Approach

Several policy recommendations were included in the submissions received. These included overall policies or objectives relating to the importance of the transition to a low carbon, climate resilient economy and society.

Several submissions also highlighted that the Draft Plan should align with European, National, and Regional policy with respect to climate action.

A number of submissions requested a more detailed and targeted approach to climate action in the next Development Plan with the inclusion of specific targets and development management criteria in relation to climate action and the circular economy.

Some submissions requested that Fingal County Council have regard to the recommendations of the Climate Action, Biodiversity and Environment SPC in terms of drafting and implementing policy in relation to climate action.

Zoning of land that has regard to the incorporation of sustainable renewable energy technologies in future development should be considered.

Several submissions raised concern in relation to the inclusion of rigid climate action policies and objectives in the next development plan, that may be detrimental to certain sectors such as agriculture, the aviation industry and the overall economy.

Several submissions requested that the SEA and AA associated with the Development Plan have regard to Climate Action as an indicator and impacting factor. Similarly, several other submissions raised concern over the impact of climate change on SPA's/ SAC's/ RAMSAR Sites/ PNHA's.

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Communication/Education/Leadership

In terms of our approach to climate action, a number of submissions received requested that FCC take a leadership role in influencing and promoting the behavioral change which is fundamental to achieving our decarbonisation goals through green procurement and the promotion and increased use of renewable energy within the County. Better engagement between the Council and local community groups and Elected Members was also highlighted.

A number of submissions requested better engagement from Fingal County Council and that we act in an educational capacity on climate issues for the general public. Part of this role could include providing information to the public and the construction industry on passive house/low energy building technology, which would help speed up the implementation of building methods that reduce the need for heating energy use.

Renewable Energy

The majority of submissions received including submissions from the Department of the Environment, Climate and Communications (DECC) and Geological Survey Ireland (GSI) requested a move away from fossil fuels and the promotion of the use of renewable energy sources such as district heating, geothermal and ground heat pumps, solar power, wind turbines, biomass, anaerobic digestion, micro generation of renewable energy, etc. and to promote the installation of such renewable energy sources in all homes and businesses throughout the County.

Some submissions went on to request the funding of larger scale local/community-owned renewable energy sources (such as biomass, anaerobic digestion, Solar Thermal and Photovoltaic, micro hydro and tidal) within communities/towns, which could serve not just individual households but the wider community.

On the issue of renewable energy, some submissions stated that Data Centres should be powered through self-generated 100% renewable energy and should also be required to use the heat from their servers/refrigeration units to provide local heating for leisure centres, community houses etc. Similar submissions to this raised the idea of providing District Heating from industry to reduce Green House Gases and Ballycoolin Industrial area is referenced in this regard.

Several submissions commented on the need for larger scale renewable energy sources such as the utilisation of the coast for wind/wave energy production.

Other submissions requested that a Renewable Energy Strategy should be prepared to investigate the potential for further renewable energy production in Fingal.

A number of submissions including the submission from the Electricity Supply Board (ESB) requested that the existing Wind Energy Strategy be reviewed. An updated strategy which targets and identifies areas suitable for wind energy development would provide clarity for all stakeholders and the opportunity to appropriately assess a range of land typologies in the County for wind energy development on their specific merits.

In relation to the provision of renewable energy infrastructure, requests were received for the provision of such infrastructure at certain locations. One such request was to install a hydroelectric generator at Hynestown reservoir to power public lighting and public buildings/sites.

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Transport and Climate Action

One of the main issues that was highlighted in the submissions received related to the provision of Electric Vehicle charge points, which is a good indication that the community is embracing more sustainable modes of transport. Another point raised in relation to this issue was that infrastructure for charging of electric vehicles should have photovoltaic (PV) panels to generate power, in order to maximize the effectiveness of this infrastructure.

On the whole, requests were received for the provision of suitably located, better public transport, which provides a better service (more frequency), is more sustainable (not powered by fossil fuels), integrates with active travel infrastructure (walking and cycle routes) and ultimately reduces use of the private car. With regard to public transport, several submissions inferred that residential densities near stations should be high and also set out that better integration between land-use planning and transport is required to reduce congestion and emissions.

The issue of active travel (walking and cycling), while raised in relation to integration with public transport, was also raised independently, in terms of it being an alternative to public transport and not just something that is used in conjunction with public transport. Active travel can be brought forward in the County by maintaining attractive walking and cycling routes and ensuring off-road access to schools by joining up and adding to existing pathways. Active travel and biodiversity can go hand in hand i.e. our greenways.

Coastal Management

Coastal management was cited several times in the submissions received. In response to climate change and coastal erosion, several submissions including the submission from the Office of Public Works (OPW) suggested that Fingal County Council should have regard to areas that may be at risk or vulnerable to coastal erosion or coastal change, including change associated with climate change (e.g. sea level rise, increased storm frequency, accelerated rates of coastal erosion, etc.) A precautionary approach should be taken in this regard where analysis of potential future coastal change, including potential climatic effects, has not yet been carried out. Solutions put forward in the submission received include planting more trees and shrubs and encouraging the growing of marram grass on and around sand dunes to encourage and stabilise them.

Following on from what is discussed above, several submissions requested that no new developments should take place in areas which are likely to be negatively impacted by rising sea levels, coastal erosion and / or regular flooding.

The impact of climate change on architectural heritage particularly in coastal areas was also highlighted and it is requested that urgent remedial works be carried out to the harbour wall at Rush and that groynes are constructed at sea in areas badly effected by coastal erosion.

Furthermore, several submissions requested the implementation of a coastal monitoring programme/coastal erosion strategy, which would help to address some of the concerns raised in relation to coastal management. As well as specific coastal monitoring programmes, appropriate policies, objectives and land use zonings were requested to resolve the issue of coastal erosion.

Flood Defense

An issue that was raised in many of the submissions received including the submission from the OPW, was the avoidance of development in areas potentially prone to flooding now and in the future. In these areas it is key to provide space for future flood defenses, set specific development management objectives and if certain development is deemed to be acceptable as such locations, specify minimum floor levels. It has also been

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highlighted that areas potentially prone to flooding often also support biodiversity, which strengthens the case that careful consideration around development in these areas is required. Flood defenses if required in these areas should aim to mitigate against the effects of climate change while also not damaging the natural environment or sensitive habitats.

Several submissions sought the construction of specific flood defense infrastructure such as a secondary culvert along Channel Road, Rush to protect the properties at risk from fluvial flooding.

Mitigation

In relation to mitigation, several submissions requested increased tree planting and a subsequent planting strategy for rural and urban areas to address the impacts of Climate Change. Roadsides and unused green spaces should be used for trees, flowers and wild flowers which would have a positive environmental impact rather than grass verges which require to be cut, further contributing to emissions. Provision should be made for rewilding of areas.

Several submissions requested the promotion of regenerative agriculture in order to reduce soil erosion.

The provision of good quality broadband has been highlighted in several submissions, as it would enable more working from home which would lessen the demand for car usage, road traffic congestion and the unnecessary wastage of using petrol / diesel. Some submissions also requested the promotion of remote working.

Intelligent street lighting should be developed / installed so as only to illuminate when and where necessary, as having street lighting left on for hours on end when there is no human or vehicular activity is wasteful of electrical power. Change all street lights out to LED bulbs.

Several submissions have highlighted the need for the Council to link in with appropriate state entities to ensure quick and speedy access to the national grid to allow the many businesses, farmers and home owners in the County to move to green and sustainable energy sources.

A number of submissions including the submission from the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media (DTCAGSM), highlighted the need for reuse, rather than redevelop existing buildings of all periods. This includes recognising the inherent sustainability of vernacular buildings by virtue of their use of natural and renewal materials of local origin and ensuring the retention and careful rehabilitation of historic buildings in our landscapes.

A number of submissions requested that the Council carry out a carbon audit of its existing building stock and retrofit with more insulated building fabric and sustainable technologies.

Adaptation

Several submissions have requested that the Council identify infrastructure in the County which is vulnerable to the impacts of climate change and implement proactive adaption measures to ensure the long-term resilience of this infrastructure to the impact's climate change.

A number of submissions received inferred that the best way to protect against the detrimental effects of climate change on the heritage resource is to ensure that our heritage resources are kept in use, adapted and maintained to suit. In the preparation of the Local Authority adaptation strategies, there are several issues regarding protection of architectural heritage that should be considered to identify the architectural heritage at risk in its area, to assess its vulnerability to climate change and develop disaster risk reduction policies for direct and indirect risks. These include:

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- Identify the architectural heritage in the Local Authority area, which may be under threat, directly or indirectly, due to climate change.
- Include objectives to carry out climate change risk assessments for the historic structures and sites in the Local Authority's functional area particularly those in the authority's own remit.
- Include objectives to develop disaster risk reduction policies addressing direct and indirect risks to the architectural heritage in its area.
- Include objectives to develop resilience and adaptation strategies for the architectural heritage in its area.

One of the main requests in the submissions received was the use of nature as a defense against climate change impacts. This is known as ecosystem-based adaptation (EbA).

Webinar 4: Connectivity and Climate Action

During the webinar, a wide variety of issues were raised including reference to a low carbon society, the impact of climate action policy on certain sectors such as agriculture and the provision of Electric Vehicle charge points.

The issues raised in the Connectivity and Climate Action Webinar have been dealt with throughout the report.

CHIEF EXECUTIVE'S RESPONSE

Policy Approach

The impact that climate change will have on Fingal over the life of the next Plan is acknowledged. Fingal's transition to a low carbon, climate resilient economy and society is of paramount importance and will be a central and cross cutting theme in the next Plan. The Draft Plan will align with European, National, and Regional policy with respect to climate action, but will also have bespoke/specific, balanced objectives and policies with regard to Climate Action for Fingal.

In relation to requests that the Council have regard to the recommendations of the Climate Action, Biodiversity and Environment SPC in terms of drafting and implementing policy in relation to climate action, several members of the relevant SPC will be involved in the Development Plan process, thus ensuring consistency between the recommendations of the SPC and the Climate Action policy content of the next Plan.

The SEA and AA associated with the Development Plan will follow the required procedure and have regard to appropriate and relevant information and indicators.

Communication/Education/Leadership

In terms of our approach to climate action, FCC take a leadership role in influencing and promoting the behavioral change which is fundamental to achieving our decarbonisation goals through green procurement and the promotion and increased use of renewable energy within the county. Our Climate Change Action Plan 2019-2024 features a range of actions across five key areas - Energy and Buildings, Transport, Flood Resilience, Nature-Based Solutions and Resource Management - that collectively address the four targets of this plan:

- A 33% improvement in the Council's energy efficiency by 2020
- A 40% reduction in the Council's greenhouse gas emissions by 2030
- To make Dublin a climate resilient region, by reducing the impacts of future climate change-related events

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- To actively engage and inform citizens on climate change

Through achieving the targets set in this plan, FCC are actively taking a leadership role in tackling climate change.

As part of the response to climate change, Climate Action Regional Offices have been established and Fingal sits within the Dublin Metropolitan Region. The Dublin Metropolitan Climate Action Regional Office (CARO) is one of four regional climate change offices that have been set up in response to Action 8 of the 2018 National Adaptation Framework (NAF). One of the roles of the Dublin CARO is to develop education and awareness initiatives for the public, schools, NGOs and other agencies engaged in driving the climate change agenda and contribute to the National Dialogue on Climate Action (NDCA) on a local and regional basis.

Renewable Energy

It is clear that a key part of our efforts to tackle the climate emergency is a switch to renewable sources and to make our current use of energy more efficient. In this regard, FCC welcomes and supports the use of renewable energy generated either by large renewable energy facilities, by micro-renewable technologies installed in buildings, or through the adaption of existing facilities in the County to utilize their existing outputs such as heat generation.

The drafting of a Local Authority renewable energy strategy (LARES) is currently being progressed by FCC. The LARES would promote the use of renewables throughout the County. The next Plan will support Renewable Energy projects through the inclusion of appropriate policies and objectives, while also having regard to relevant National and Regional policy for both on shore and off shore renewable energy.

A draft Wind Energy Strategy is in place and the next Plan and the policies and objectives within, would support a Renewable Energy Strategy document.

FCC will continue to engage with the other Dublin Local Authorities and Codema to determine the most advantageous timeframe for the development of an overarching strategy document and will be informed by the work to date on Codema's Energy Masterplan.

Transport and Climate Action

Promoting and delivering more sustainable forms of transport and movement in the County will be central to the overall approach to the development of the Fingal during the lifetime of the next Plan. This approach recognises the benefits of providing better infrastructure and facilities for pedestrians and cyclists and incorporating these with our rich natural heritage resource, of limiting the use of the private car to essential use only, and of promoting a switch to electrical vehicles through the provision of EV charge points in suitable locations throughout the County. It should also be noted that the Local Authority is providing EV charge ducting in all new social housing units and ensures the provision of EV chargers in accordance with the building regulations in all new developments.

With regard to the provision of better, suitably located, integrated, more frequent and more sustainable public transport, Fingal County Council will continue the work with the NTA and TII as part of the preparation of the next Plan to ensure that public transport in Fingal is all of these things, so as to encourage a move away from the private car and move closer to becoming a low carbon society. Fingal County Council has prioritised the promotion of Active Travel as part of our ongoing commitment to Climate Action with the creation of the Environment, Climate Action and Active Travel Department, which will have responsibility for mobility planning and the delivery of the National Transport Authority's cycle network within the County.

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Coastal Management

The Council will continue to work with relevant authorities such as the Office of Public Works on the identification and development of additional flood protection measures where necessary. The next Plan will acknowledge the dynamic nature of the coastline and will include a range of policies and objectives on how coastal change is to be managed.

With regard to the development of a coastal monitoring programme, the OPW in consultation with Fingal County Council is piloting the Rogerstown Outer Estuary as one of 5 National locations. Drone flights have commenced, and this pilot will inform the roll out of a National programme. A new National Coastal Change Strategy Steering Group has also recently been set up to examine this issue.

In relation to the Coastal Protection Plan for Portrane, Rush and Rogerstown Outer Estuary, an Options Report has been completed and the preferred option has been communicated to the community through a series of virtual information meetings. The installation of specially designed Y-shaped groynes structures combined with beach supplementation and flood embankments at the Burrow and a floodwall in Rush are considered the preferred coastal defence options. The consultants are now finalising the design and preparing supporting documents for the project.

Fingal County Council is the first Local Authority in the Country to undertake a risk assessment of the effect on climate change hazards on its heritage assets. The results of this risk assessment will act as a robust baseline for the prioritisation of mitigating actions. The Council will consider the inclusion of objectives in relation to climate change adaptation to ensure climate change measures are not detrimental to heritage assets.

Flood Defense

Flooding events associated with climate change will only increase and spread with extreme weather events and rising sea levels. The vital importance of preparing for and acting to protect against climate related surface water flooding is recognised. In addition to preparing its own Strategic Flood Risk Assessment for the next Plan, the Council will continue to work with relevant authorities such as the Office of Public Works on the identification and development of additional flood protection measures, which respect their environmentally sensitive setting, where necessary. As such, it is recommended that the Development Plan include policies to mitigate against climate related flooding and to integrate sustainable urban drainage systems into their design and construction.

Mitigation

With regard to mitigation measures such as tree planting, it is an action of Fingal's Climate Change Action Plan 2019-2024 to identify sites for woodland planting that promotes an appropriate native species mix. Fingal County Council's Woodland Management Programme is being developed as part of the revised Fingal Tree Strategy 'The Forest of Fingal, A Tree Strategy for Fingal'.

Fingal is responsible for over 2,000 hectares of open space. Much of the open space comprised of short grass that would have been cut every two to three weeks throughout the growing season. About 10 years ago, the Council switched to wildflower meadows in bigger open spaces and regional parks. Local farmers harvest the hay once a year. This has reduced the management input into the meadows, thereby reducing petrol consumption and emissions. The wildflower meadows also have a great wildlife benefit and provide a lot of colour in the parks for the visiting public to enjoy.

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With regard to the promotion of regenerative agriculture, Fingal is home to agriculture, horticulture, centres of food production and agri-food businesses and we will work with these sectors to ensure that their practices are in line with current best practice.

The provision of good quality broadband is of paramount importance to Fingal, not only in terms of infrastructure provision and making Fingal a great place to live, work and do business, but also in terms of making Fingal a low carbon society. Issues around broadband provision will be dealt with in more detail under Theme 7 of this report.

In relation to the submissions received in relation to more energy efficient street lighting, it is an action of the Fingal County Council Climate Change Action Plan 2019-2024 to have all street lighting fitted with LED's by the end of 2021. This action is 75% complete at this stage.

In relation to the provision of suitable infrastructure so that all businesses and residents in Fingal can avail of green energy, Fingal County Council will continue to work with the various utility providers to ensure that suitable infrastructure is provided. This issue will be discussed in more detail in Theme 7 of this report.

In relation to the submissions received highlighting the need to reuse, rather than redevelopment of existing buildings of all periods, it should be noted that the current Development Plan contains several policies and objectives requiring the reuse and adaptation of the existing building stock in preference to new build. Such policies and objective will also be a feature of the next Plan.

In relation to the Council's existing building stock, it is a requirement of the Fingal County Council Climate Change Action Plan 2019-2024 that refurbishment programmes for Fingal Corporate buildings include energy reviews and retrofits as standard. The next Plan will continue to support the implementation of our Climate Change Action Plan.

Adaptation

Risk assessments of critical infrastructure are essential to increase the state's resilience to adverse climate impacts. As part of the development plan process, a Strategic Flood Risk Assessment (SFRA) will be carried out and will highlight any areas and infrastructure at risk from flooding. Through this process, suitable policies and objectives to protect at risk infrastructure will be identified and included in the next Plan.

FCC is the first Local Authority in the Country to undertake a risk assessment of the effect on climate change hazards on its heritage assets. The results of this risk assessment will act as a robust baseline for the prioritisation of mitigating actions. The Council will consider the inclusion of objectives in relation to climate change adaptation to ensure climate change measures are not detrimental to heritage assets.

Ecosystem-based adaptation sits within the broader theme of nature-based solutions which is one of five main themes in the Fingal County Council Climate Change Action Plan 2019-2024. EbA involves the conservation, sustainable management and restoration of ecosystems, such as forests, grasslands, wetlands, and building resilience to ecosystems. There are a number of actions in our Climate Change Action Plan which specifically relate to Ecosystem-based adaptation.

As stated previously the next Plan will continue to support the implementation of our Climate Change Action Plan.

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CHIEF EXECUTIVE'S RECOMMENDATIONS

- Incorporate climate action as an overarching and cross-cutting theme across the Draft Plan in line with policies and objectives contained in the NPF, the RSES, FCC's Climate Change Action Plan 2019-2024 and national legislation.
- Support implementation of the Council Climate Change Action Plan 2019-2024.
- Support Renewable Energy projects through the inclusion of appropriate policies & objectives, while also having regard to relevant national and regional policy for both on shore and off shore renewable energy.
- Consider the inclusion of objectives in relation to climate change adaptation to ensure climate change measures are not detrimental to heritage assets.
- Promote the relevant measures to achieve a reduction in GHG emissions and energy use.
- Ensure that the county's need for sustainable environmental infrastructure is addressed in a way which contributes to wider climate action goals and targets.
- Support the move to a low carbon economy and update and provide new, where necessary, climate change, energy and renewable energy objectives in the Draft Plan in order to accommodate this move to a low carbon economy.
- Promote sustainable settlement and transport strategies within the county and identify measures, including targets for modal shift, to reduce energy use, GHG emissions and adaptation to climate change.
- Ensure the built environment is climate change ready by supporting climate change mitigation and adaptation measures as part of new and existing developments.
- Consider the inclusion of objectives in relation to climate change adaptation to ensure climate change measures are not detrimental to heritage assets.
- Review existing policies and objectives relating to how coastal change is managed in the current Plan, in order to amend, augment and update as appropriate in light of developing national policy and submissions.
- Support the forthcoming 'Dublin Regional EV Charging Strategy' and the growth of Electric Vehicle use as an alternative to the use of fossil-fuel burning vehicles, through a roll-out of additional charging points at appropriate locations.
- Ensure that the concept of sustainable development focused on the sensitive, appropriate and well-designed re-development and re-use of existing building stock of Fingal is interwoven through all chapters/sections of the Draft Plan. That the structure of each chapter addresses re-use first before giving direction for new build.

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- Prepare an updated Strategic Flood Risk Assessment (SFRA) for Fingal and continue to work with relevant authorities on the identification and development of additional flood protection measures where necessary, to strengthen existing policies in relation to SFRA.

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THEME 3: CONNECTIVITY AND MOVEMENT

Submissions Received:

FIN-C377-2, FIN-C377-4, FIN-C377-7, FIN-C377-11, FIN-C377-12, FIN-C377-15, FIN-C377-20, FIN-C377-27, FIN-C377-28, FIN-C377-29, FIN-C377-34, FIN-C377-36, FIN-C377-37, FIN-C377-38, FIN-C377-42, FIN-C377-43, FIN-C377-45, FIN-C377-46, FIN-C377-49, FIN-C377-51, FIN-C377-52, FIN-C377-54, FIN-C377-55, FIN-C377-59, FIN-C377-61, FIN-C377-62, FIN-C377-63, FIN-C377-64, FIN-C377-66, FIN-C377-67, FIN-C377-70, FIN-C377-71, FIN-C377-72, FIN-C377-73, FIN-C377-75, FIN-C377-76, FIN-C377-80, FIN-C377-81, FIN-C377-85, FIN-C377-87, FIN-C377-90, FIN-C377-91, FIN-C377-92, FIN-C377-94, FIN-C377-96, FIN-C377-97, FIN-C377-99, FIN-C377-101, FIN-C377-104, FIN-C377-105, FIN-C377-106, FIN-C377-107, FIN-C377-109, FIN-C377-110, FIN-C377-111, FIN-C377-113, FIN-C377-114, FIN-C377-115, FIN-C377-118, FIN-C377-119, FIN-C377-120, FIN-C377-123, FIN-C377-126, FIN-C377-129, FIN-C377-130, FIN-C377-131, FIN-C377-132, FIN-C377-134, FIN-C377-137, FIN-C377-140, FIN-C377-142, FIN-C377-144, FIN-C377-146, FIN-C377-147, FIN-C377-149, FIN-C377-150, FIN-C377-152, FIN-C377-153, FIN-C377-154, FIN-C377-155, FIN-C377-156, FIN-C377-157, , FIN-C377-158, FIN-C377-160, FIN-C377-163, FIN-C377-164, FIN-C377-167, FIN-C377-168, FIN-C377-169, FIN-C377-170, FIN-C377-171, FIN-C377-173, FIN-C377-177, FIN-C377-179, FIN-C377-181, FIN-C377-182, FIN-C377-188, FIN-C377-190, FIN-C377-192, FIN-C377-193, FIN-C377-195, FIN-C377-196, FIN-C377-197, FIN-C377-202, FIN-C377-203, FIN-C377-208, FIN-C377-209, FIN-C377-210, FIN-C377-211, FIN-C377-212, FIN-C377-213, FIN-C377-214, FIN-C377-216, FIN-C377-218, FIN-C377-220, FIN-C377-222, FIN-C377-224, FIN-C377-225, FIN-C377-233, FIN-C377-234, FIN-C377-235, FIN-C377-236, FIN-C377-237, FIN-C377-245, FIN-C377-246, FIN-C377-248, FIN-C377-251, FIN-C377-253, FIN-C377-256, FIN-C377-257, FIN-C377-258, FIN-C377-260, FIN-C377-261, FIN-C377-263, FIN-C377-264, FIN-C377-266, FIN-C377-267, FIN-C377-269, FIN-C377-271, FIN-C377-275, FIN-C377-276, FIN-C377-279, FIN-C377-281, FIN-C377-284, FIN-C377-285, FIN-C377-286, FIN-C377-287, FIN-C377-290, FIN-C377-293, FIN-C377-294, FIN-C377-295, FIN-C377-296, FIN-C377-297, FIN-C377-300, FIN-C377-301, FIN-C377-304, FIN-C377-307, FIN-C377-309, FIN-C377-310, FIN-C377-313, FIN-C377-315, FIN-C377-325, FIN-C377-326, FIN-C377-327, FIN-C377-328, FIN-C377-329, FIN-C377-330, FIN-C377-331, FIN-C377-333, FIN-C377-334, FIN-C377-335, FIN-C377-336, FIN-C377-337, FIN-C377-341, FIN-C377-343, FIN-C377-345, FIN-C377-349, FIN-C377-357, FIN-C377-359, FIN-C377-361, FIN-C377-362, FIN-C377-365, FIN-C377-367, FIN-C377-368, FIN-C377-370, FIN-C377-372, FIN-C377-377, FIN-C377-378, FIN-C377-379, FIN-C377-381, FIN-C377-382, FIN-C377-383, FIN-C377-385, FIN-C377-386, FIN-C377-387, FIN-C377-389, FIN-C377-391, FIN-C377-392, FIN-C377-395, FIN-C377-399, FIN-C377-400, FIN-C377-401, FIN-C377-402, FIN-C377-403, FIN-C377-405, FIN-C377-406, FIN-C377-407, FIN-C377-408, FIN-C377-409, FIN-C377-412, FIN-C377-414, FIN-C377-415, FIN-C377-417, FIN-C377-418, FIN-C377-419, FIN-C377-420, FIN-C377-422, FIN-C377-424, FIN-C377-425, FIN-C377-428, FIN-C377-430, FIN-C377-433, FIN-C377-434, FIN-C377-435, FIN-C377-436, FIN-C377-438, FIN-C377-440, FIN-C377-442, FIN-C377-443, FIN-C377-444, FIN-C377-447, FIN-C377-448, FIN-C377-449, FIN-C377-450, FIN-C377-451, FIN-C377-455, FIN-C377-456, FIN-C377-457, FIN-C377-458, FIN-C377-461, FIN-C377-463, FIN-C377-466, FIN-C377-467, FIN-C377-468, FIN-C377-469, FIN-C377-471, FIN-C377-472, FIN-C377-474, FIN-C377-475, FIN-C377-476, FIN-C377-477, FIN-C377-479, FIN-C377-480, FIN-C377-481, FIN-C377-482, FIN-C377-483, FIN-C377-485, FIN-C377-486, FIN-C377-487, FIN-C377-488, FIN-C377-490, FIN-C377-491, FIN-C377-492, FIN-C377-494, FIN-C377-495, FIN-C377-496, FIN-C377-498, FIN-C377-500, FIN-C377-502, FIN-C377-505, FIN-C377-506, FIN-C377-507, FIN-C377-508, FIN-C377-510, FIN-C377-522, FIN-C377-524, FIN-C377-527, FIN-C377-530, FIN-C377-531, FIN-C377-536, FIN-C377-540, FIN-C377-542, FIN-C377-548, FIN-C377-551.

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SUMMARY OF ISSUES

Sustainable Travel

A vast majority of submissions require that the new Plan supports sustainable travel modes as alternative travel options to the private car as well as support compact growth and a reduction in transport emissions through sustainable modes. In this context, policy within the new Plan must build on national and regional policies for sustainable growth and mobility and continue to integrate transport provision with land use aimed at securing modal shift to sustainable modes such as walking, cycling and public transport. It was also highlighted that maximising the potential of high capacity rail and bus corridors will support the integration between land use planning and public transport. In this context, higher densities, mixed-use developments, regeneration and brownfield/infill development as well as employment intensive development must be targeted in areas where opportunities exist for sustainable transport provision and in a manner that better aligns the provision of transport with demand. In this regard, it is highlighted that the new Plan should support the implementation of an increased level of Transport Orientated Development [TOD] consolidated around existing or planned rail stations and/or along high-frequency transport corridors at a density that provides a critical mass to support the viability of high capacity public transport, to protect investments made in public transport and support other complementary community and social uses including mixed use neighbourhoods. In this regard, the South Fringe area within the County is cited as an area for consideration. In this context, it is recommended that Fingal County Council carry out an assessment to inform plan policy.

The Avoid-Shift-Improve approach is recommended as a best practise approach in formulating the necessary policy framework to facilitate increased travel demand through a sustainable approach. The required completion of LAPs and Masterplans for zoned strategic residential and employment land banks adjoining high capacity public transport corridors is also required. The Department of Transport highlights the new Sustainable Mobility Policy framework currently under preparation relating to active travel and public transport provision which is based on national policy. The Strategic Investment Framework for Land Transport 2015 is also noted with priorities for investment. Alongside the new Sustainable Mobility Policy framework, it is noted that the Department is developing a new land transport investment framework. This framework will prioritise future investment in the land transport network to support delivery of the NPF's national strategic outcomes.

The need to maximise accessibility to public transport and improve connectivity and ease of movement between alternative travel modes is seen as key in creating a shift away from dependency on the private car. The application of the universal design approach is also considered as a fundamental requirement to ensure accessibility for all ages and abilities to sustainable travel modes.

It is noted that a range of supporting measures will be needed to influence travel choices and create a change in travel behaviours to support the delivery of an effective public transport system, including controlled parking management, demand management measures, mobility management plans for new developments and behavioural change programmes. In addition, the need for an increase in the level of electric buses, cars and personal mobility modes such as e-bikes and e-scooters as well as EV charging infrastructure within the County including Council owned parks is required to facilitate a modal shift to more sustainable modes.

Walking and Cycling (Active Travel)

The need for new and improved walking and cycling routes at local and strategic level within the County is highlighted in the vast majority of submissions which shows the impetus among Fingal residents for the development of new and improved walking and cycling infrastructure, particularly in a post Covid-19 environment. Walking and cycling is seen by many as a real alternative to the private car which also promotes health and well-being, facilitates climate change and enables accessibility to parks and other recreational

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amenities, train stations, schools and communities. The need for more intensive commuter cycle paths linking key destinations was also highlighted and this issue should be addressed through a detailed assessment in formulating the new Plan. Many areas within the County have been identified for the provision of linked cycle and walking routes including Donabate, Howth, Sutton, Portmarnock, Malahide, Swords, Dublin 15, Rush, Lusk, Skerries, Balbriggan, Balrothery and Loughshinny including the villages of Naul, Oldtown, Ballyboughal, Garristown, Kinsaley, Rowlestown and the St. Margaret's area. A 'walkability' audit of towns and villages in Fingal is also recommended in developing a pedestrian safe environment and to promote active travel. The provision of dedicated walking and cycling paths in Council parks together with improved walking and cycling accessibility to these parks is required from surrounding areas. Examples in this regard include enhanced access from Balrothery and Skerries to Ardgillan Regional Park and Demesne and to Newbridge Regional Park and Demesne from existing regional roads.

Overall, the implementation of a co-ordinated cycling and walking network within the County together with supporting facilities such as cycle parking and storage in secure areas and segregated lanes is required. It is highlighted that the provision of walking and cycling infrastructure will allow Fingal to set tangible mode share targets for active travel within the County and such targets should be progressed and monitored during the lifetime of the new Plan. An Active Travel Strategy for the County based on the NTA's Greater Dublin Area Cycle Network Plan and compliance with NTA standards is suggested. It is also highlighted that proactive implementation of the Government's DMURS and Smarter Travel documents will assist in delivering sustainable and active transport modes as well as public realms to cater for pedestrians and cyclists. In this context, pedestrianisation of streets such as the Main Streets in Swords and Blanchardstown is recommended. Reduction in traffic speeds within towns and villages within Fingal and in the vicinity of schools in the interests of pedestrian and cyclist safety and to promote active travel is also suggested. The Dutch model is referenced in support. To facilitate safe pedestrian movement across existing roads and to schools in particular, additional pedestrian crossings and new pedestrian connections are required within specific areas across Fingal including areas such as Malahide and Skerries.

In planning and developing this active travel network, the application of the universal design approach is considered a fundamental requirement to ensure accessibility for all ages and abilities. Specific design considerations for walking and cycle ways were also raised in relation to the removal of physical barriers such as bollards and kissing gates as these can act as an impediment to areas that cannot be used by people on non-standard bicycles or using wheelchairs or buggies. Connectivity together with permeability was highlighted as playing a vital role in the quality and usability of walking and cycle routes for all developments and communities in general and supportive policy is required in this regard. Accessibility for service vehicles should also be considered in developing mobility schemes.

Greenways

At a strategic level, the development of a network of Greenways for walking and cycling within Fingal is required. Greenway development is seen as essential recreation and tourism infrastructure connecting recreational amenities, cultural heritage assets, towns and rural areas within the County as well as facilitating connections with adjoining counties such as Dublin and Meath. It is suggested that the success of Greenway development would significantly benefit from connectivity to public transport infrastructure, existing towns and local amenities, supporting facilities and universal access as well as marketing promotion. To maximise the potential of Greenway development, it is recommended that the strategic Greenway network within the County remain under the ownership and control of Fingal County Council. The Fingal Coastal Way, the Broadmeadow Way and the Royal Canal Greenway projects should be prioritised for completion with a specific focus on connectivity to surrounding areas and amenities. New strategic Greenway development is suggested within coastal areas and natural amenity areas such as the Strawberry Beds, Tolka, Liffey Valley and Royal Canal corridors and within towns such as Balbriggan and Swords linking to the Broadmeadow and Ward River

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Valley Parks and onwards to Malahide and the Donabate peninsula and to the future Fingal Coastal Way. Greenway proposals are also suggested in rural areas such as Naul, Garristown and St. Margaret's with linkages to key towns.

Extensive public consultation and engagement with the general public, local communities and land owners should occur in the planning and development of walking and cycling schemes including strategic Greenways to address any issues of concern regarding planned routes. The CPO process is not a preferable approach to facilitate Greenway development. The newly drafted IFA code of practice should be implemented at all times in this regard. It is recommended that a Walking Development Officer be employed by Fingal County Council to advance walking routes at local and strategic levels within Fingal and funding of green routes should occur in co-operation with the NTA and other relevant stakeholders. The protection of designated environmental sites, sensitive landscape settings and species as well as appropriately designed lighting and landscaping are critical considerations in the development of walking and cycling schemes.

Public Transport

A fully integrated and co-ordinated public transport system is highlighted as a necessary requirement for the future growth and prosperity of Fingal, to reduce dependency on the private car, improve quality of life and to facilitate a reduction in carbon emissions. Better links are required serving Dublin City Centre, Dublin 15 and surrounding suburban areas and towns such as Malahide, Lusk, Rush, Skerries and Balbriggan. In this context, it is recommended that an assessment of bus and rail services to towns such as Lusk, Rush, Skerries and Balbriggan in view of more frequent and direct services is required.

Internally within the County, improved public transport movement across the County is required with a particular focus on improved links between Swords, Dublin Airport and Blanchardstown to facilitate increased levels of sustainable travel in the County. It is highlighted that MetroLink, BusConnects, DART + and LUAS projects will facilitate sustainable development, economic growth and attract inward investment to Fingal and the wider Dublin and mid-east region and the importance delivering these key enabling public transport projects in collaboration with relevant stakeholders should be acknowledged and supported in the new Plan.

Rail

The importance of heavy rail as a high capacity, high frequency alternative mode choice in Fingal as part of a wider GDA integrated transport system is highlighted. In this context, Irish Rail proposals for improvements to the overall network including electrification of routes, additional stops, station enhancement proposals and additional inter-city rail cars to improve frequencies and efficiency of services is acknowledged. In this context, support for the removal of level crossings and alternative infrastructure solutions is considered necessary to facilitate the efficient delivery of the DART+ West scheme. The removal of any rail level crossings to facilitate rail improvements must have careful regard to local environmental impacts. The DART+ project to Balbriggan which will include significantly enhanced rail services along the northern rail line and western line to Maynooth, as well as the delivery of the MetroLink to Swords and Dublin Airport should be prioritised in the context of planned rail projects.

Protection of a heavy rail alignment to Dublin Airport requires consideration and a heavy rail route options assessment study should be undertaken by the NTA and the preferred route preserved in the context of any future transport strategy. Provision of new train stations at Skerries and Malahide was suggested in the context of improving service provision to these towns. The Department of Transport notes the collaboration

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with the Department of Infrastructure (Northern Ireland) in agreeing the provisions of an all-Ireland strategic rail study on faster intercity connectivity, improved regional connectivity and freight and the new Plan should consider and support the outcomes of the study.

At a more localised level, where new rail bridges including footbridges are required by Fingal County Council to facilitate access and connectivity to new housing developments, Irish Rail requires the Council's Transportation Department to take direct responsibility for this infrastructure from a construction and maintenance perspective and supportive policy is required in the new Plan in this regard.

Bus

The importance of regular and efficient bus services as part of a wider, integrated transport system should continue to be promoted. It is acknowledged that bus provision is particularly important in the interim period before the delivery of new public transport infrastructure within the County. The importance of supporting bus operations through the provision of additional facilities such as additional bus terminus facilities in the Dublin 15 area to reduce the overall environmental impacts of bus operations on the local area is recommended. In conjunction with Dublin Bus operations, the potential for feeder or private bus operations was suggested to improve connectivity within towns to services and amenities and to train stations such as Rush and Lusk. The Dublin 15 area and Howth are suggested as areas suitable for the operation of private bus operations such as IMP bus provision offering connectivity to existing public transport. Bus connectivity between Howth Junction and Dublin Airport is proposed in the context of Dublin Airport expansion to reduce car traffic on the local road network. Public consultation and engagement with local communities should occur in the planning and development of strategic public transport projects to address any issues of concern. In this context, the BusConnects scheme should retain mature trees along relevant routes and the 39X express bus service Ongar to the City Centre should be reinstated as part of this scheme.

Rural Transport

The need to improve the frequency and reach of public transport services within the rural areas of Fingal is required to address social exclusion and with facilitate connectivity to key towns and employment, education and services. The new Plan should acknowledge the important role that the Local Link rural transport service plays in providing improved connectivity and mobility in rural areas and Fingal County Council should engage with the Local Link service provider in this regard.

Protection of Strategic Transport Corridors

The protection of strategic air and road corridors within Fingal are considered critical for the future prosperity of Fingal as well as at a wider regional and national level.

Dublin Airport- International Gateway

The importance of the international connectivity offered by Dublin Airport is highlighted in the context of its contribution to the national, regional and local economy. The submission from the Department of Transport highlights the current review of the National Aviation Plan having regard to the strategic importance of the benefits accruing from international connectivity through Dublin Airport and Fingal's vital contribution to the continued prosperity of both Fingal, and the country economically. In this context, it is considered critical to ensure high quality surface transport access including high frequency public transport to the Airport to meet anticipated future passenger demand following the recovery of the aviation sector post Covid-19.

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Dublin Port

Given the strategic importance of Dublin Port and the benefits accruing from strategic connectivity to European and world markets, it is requested that the new Plan includes supportive policies to facilitate the efficient movement of goods and freight on the national road network to Dublin Port in the context of the Spatial Planning and National Roads Guidelines for Planning Authorities 2012.

National Roads

The TII highlights the need to continue to safeguard the national roads network [M1, M50, M2 and M3] and associated junctions to ensure that the carrying capacity, operational efficiency, safety and national investment made in national roads is protected in accordance with the relevant provisions of the NPF, RSES and the Spatial Planning and National Roads Guidelines for Planning Authorities 2012. The Draft Plan shall also ensure the safeguarding of future National Road Schemes.

The TII notes that the implications of land use policies on the strategic national road network should be carefully considered in determining the future land use zoning strategy for the County. In this regard, proposals for development and land use zoning designations at national road interchanges and junctions should be considered and prepared in the context of the provisions of Section 2.7 of the Spatial Planning and National Roads Guidelines and in consultation with TII. Fingal County Council is also advised that any costs such as land acquisition, additional road infrastructure and environmental mitigation measures required to the national roads network to accommodate local development proposals will be borne by the Local Authority. It is recommended that the costs associated with these improvements should be integrated within future local development contributions schemes.

The Motorway Operations Services Project in the context of developing resilience on the motorway network is referenced and it is noted that the Draft Plan should continue to support these enhancement measures and take cognisance of the Department of Transport's recently published Five Cities Demand Management Study.

The TII promotes an integrated approach to land use which is considered critical to achieve compact urban growth such that local traffic generated by developments is catered for primarily within the local road network. In this context, TII recommends that while traffic and transport assessments be carried out for individual planning applications, this is, however, not considered a substitute for a prior overall transport assessment of areas in determining fundamental issues of land use and transportation as part of the development planning process for development in the vicinity of the strategic national road network. Guidance Notes PE-PDV-02046 Area Based Transport Assessment (ABTA) are referenced in support.

With regard to advertising, lighting and signage, the Council is requested to refer to TII policy on the Provision of Tourist and Leisure Signage on National Roads (March 2011) and Chapter 3 Sections 3.7 and 3.8 of the Spatial Planning and National Roads Guidelines which indicates a requirement to control the proliferation of non-road traffic signage on and adjacent to national roads and includes relevant provisions relating to lighting in the context of the national road network. Advice and guidance in respect of signage on national roads concerning major tourist and leisure features and facilities is available at <http://www.tii.ie/>. Fingal county Council is also requested to refer to the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations in the Draft Plan. The Authority advises that it requires that development proposals identify and implement noise mitigation measures, where warranted and the costs of implementing mitigation measures shall be borne by the developer.

A number of submissions requests new exits onto the M1 motorway to provide improved accessibility to the motorway for adjoining areas such as Swords, Rush, Lusk, Donabate and Skerries. Meath County Council

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requests that the Draft Plan shall have regard to the M2/N2 corridor, the M3/M4 link road and the R125 Ashbourne to Swords Regional Road and include supportive objectives in this regard.

Regional / Local Roads

A number of submissions highlight the need for improvements to the regional and local road network in urban and rural areas across the County particularly from a capacity and safety perspective. It is requested that new development occurs in tandem with adequate roads provision across the County and particularly in towns that have experienced rapid growth in recent times including areas such as Swords, Dublin 15, Rush, Lusk, Skerries and Balbriggan. The delivery of roads proposals including strategic roads to serve key towns such as Swords as set out in the current Plan should be prioritised. Concern is expressed regarding the impact of certain strategic roads proposals on local communities, the proposed Western Access Road to facilitate the growth of the Airport is one example cited in the context of the impact of largescale road proposals on the community of St. Margaret's. It is suggested that Regional Roads within the County should provide for adequate walking and cycling infrastructure in the interests of connectivity and pedestrian and cyclist safety as well as the promotion of active travel. The new Plan should also promote minimum standards for roads and streets within developments. Creating well-designed and attractive public realm to reduce the dominance of the private car and create visual interest at street level is recommended to create safer neighbourhoods with more opportunity for social interaction.

It is noted that a number of area specific references have been made relating to traffic management, on-street parking, parking enforcement issues, improvements to existing road surfaces and footpaths, the need for additional pedestrian crossings particularly along routes to schools, new signage and road markings, landscaping issues surrounding completed road schemes, regular road/footpath cleaning, provision of street lighting and additional bins on existing roads and the reopening of existing laneways within the County and in areas such as Swords, the South Fringe, Dublin 15, Balbriggan, Balrothery, Skerries, Rush, Lusk, Donabate, Malahide, Portmarnock, Sutton, Baldoyle and Howth.

Rail Freight

It is acknowledged that a case for rail freight is increasingly warranted given the need to respond to climate change and environmental targets and a revised Rail Freight Strategic Plan currently under preparation by Irish Rail is noted and the outcomes of the study should be considered in the formulating policy under the review process.

Park and Ride

The provision of Park and Ride facilities is suggested to encourage people to use public transport. In particular, Park and Ride facilities should be prioritised adjoining strategically located public transport interchanges within the County. NTA proposals for Park and Ride facilities are noted. The current engagement between the Council, Irish Rail and the NTA to develop a Park and Ride Strategy is also noted and supportive policies and objectives relating to this strategy are required in the new Plan subject to prior agreement between all parties.

Carparking

A review of car parking standards as part of the review process is required in light of promoting sustainable development and sustainable transport modes. In this context, the following are suggested:

- Maximum car parking standards close to public transport corridors,
- Maximum permitted level of car parking for commercial sites, which have suitable public transport facilities and are within walking/cycling distance to amenities.

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- Designated or free-car parking spaces for car sharing or ‘go’ cars.
- Potential for car parking charges in existing retail centres that have suitable public transport/ walking/ cycling facilities.
- Flexible car parking standards for service providers.
- Additional car parking to serve recreational amenities such as parks, beaches and train stations.
- Designated car spaces to allow accessibility for all road users within the County and mapping of accessible parking spaces within the County.
- Provision of HGV parking.
- Consistency with Section 28 Guidelines relating to car parking standards for apartment development.

Rights of Way

The identification of existing public Rights of Way and established walking routes, particularly to recreational amenities and cultural heritage sites within the County is required and an extended network of Public Rights of Way should be considered in the new Plan through the format of mapping and listing and maintained free from development. Greenway development should be considered for designation as a Public Right of Way. In assessing planning applications, the impact on public access to the countryside including Public Rights of Way requires careful consideration to ensure their protection.

Webinar 4: Connectivity and Climate Action

The need for improved public transport provision and connectivity within the County is required. Better internal public transport services and routes are considered necessary to access employment and educational services within the County. Priority for the provision of the DART to Balbriggan is required in the context of the DART expansion programme. Enhanced provision of public transport between rural villages and Swords is required to improve connectivity between rural and urban areas. Improved pedestrian and cyclist connectivity within residential developments requires consideration, particularly in existing developments where physical barriers prevent connectivity between developments. Linking towns and recreational amenities to strategic Greenways should occur as part of Greenway development and Rush and Rogerstown Park are cited in this regard in the context of the development of the proposed Fingal Coastal Way. Proposals for improved traffic management in the Swords area was also raised including delivery of strategic road infrastructure in the area. The necessary provision of landscaping in planned transport schemes was also highlighted.

The issues raised in the Connectivity and Climate Action Webinar have been dealt with throughout the report.

CHIEF EXECUTIVE’S RESPONSE

Sustainable Travel

Fingal County Council has a key role to play in the implementation and facilitation of sustainable transportation through both its infrastructure and land use policies. In terms of infrastructure, the Fingal Capital Programme is a three-year rolling programme of infrastructure projects that includes new and upgraded roads, footpaths, cycle routes, public transport facilities and Greenways. All of the projects that make up the Capital Programme are derived from, and developed in line with, the transport and movement policies of the current Plan as well as Regional and National policy objectives including the NTA’s GDA Transport Strategy 2016-2035 and the NPF.

As well as playing an important role in the facilitation of sustainable transport through the provision of new and upgraded transport infrastructure, the Council also has an important role to play in accommodating public

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transport within the County through continual engagement with bodies such as the NTA and public transport providers to identify and protect future transport corridors and support and facilitate the delivery of key transport projects through supporting policy provision. In particular, Fingal County Council works closely with the adjoining Local Authorities, the NTA and TII in this regard.

At a strategic level, Fingal County Council continues to integrate land use and transportation to achieve sustainable development through the progression of a number of Local Area Plans, Urban Framework Plans and Masterplans in line with National and Regional policy objectives including the NTA's GDA Transport Strategy 2016-2035. In this regard, higher density development is taking place within plan frameworks along existing transport corridors and these areas continue to consolidate. Current land use policy has also been developed in anticipation of planned strategic public transport investments that will directly benefit the County.

The Draft Plan will continue to support compact growth and retain policy objectives which require high density developments adjacent to good quality public transport corridors together with good permeability links. As part of the review process, an Urban Capacity Study of Settlements within Fingal will be carried out by Fingal County Council to inform plan policy relating to the growth of Fingal's settlements in line with National and Regional planning objectives for compact sustainable growth and enhanced resilience. In this context, a key component of the study will include an assessment of areas within the walkable catchment of town centres as well as areas close to good quality transport links and displaying high levels of accessibility. The potential for infill development, regeneration, densification and mixed-use development will be examined within these areas in the context of this study.

The Draft Plan will align with Smarter Travel and the Transport Strategy for the GDA 2016-2035 which sets out a statutory framework for transport (both under review), and with the NPF and the RSES which emphasise active and public transport provision and healthy placemaking. The Draft Plan will also include policies specific to the integration of land use with new transport infrastructure such as Transit Oriented Development, strategic mobility hubs and transport interchanges and measures to facilitate larger catchments for public transport services. The Draft Plan will also include objectives to improve the levels of comfort, safety and accessibility for sustainable transport users, in particular around the large-scale transport interventions that are proposed for the County including the MetroLink, Dart +, LUAS Expansion and BusConnects projects. In this regard, the Council recognises and supports the necessity of universal access and the incorporation of lifetime design principles into all developments including the transport network and the public realm. Existing standards, policies and objectives in the current Plan will be reviewed to ensure they are in line with current best practice and guidance on accessibility. Any forthcoming guidance from the Department of Transport relating to sustainable mobility will be considered and referenced in the Draft Plan.

Proactive engagement with communities, schools, businesses and other stakeholders to collaboratively bring about behavioural change has been a more recent policy focus. It is proposed that the Draft Plan will continue to build on this approach, whilst being cognisant of changes in mobility including the increasing role of shared mobility, personal mobility modes, electric vehicles and the application of technology in the mobility sector. It is noted, however, that decisions on the expansion of existing car and bike sharing schemes including licensed schemes is outside of the scope of the Development Plan. A strategy for electric vehicle charging based on a co-ordinated and collaborative approach has been prepared for the four Dublin Local Authorities which addresses a range and type of charging facilities depending on location and associated use, levels of investment required and the Local Authorities role in facilitating this infrastructure provision in order to accelerate the transition to EV vehicle use. Within Fingal owned parks, EV charging infrastructure is provided for within all new car parks and retrospective provision is being rolled out in existing car parks. The Draft Plan will include policies on EV charging infrastructure including for new and existing developments and the

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potential to offer this within the public realm to support the growth of EV's at the rate envisaged in the Government's Climate Action Plan (2019).

Walking and Cycling (Active Travel)

Fingal County Council has a significant infrastructural programme of works to support sustainable and active modes of transport. This ranges across commuter-focused, utilitarian urban cycling and walking routes, recreational Greenway routes and targeted measures such as Schools Streets and Safe Routes to schools. Major investment has occurred in the development and enhancement of walking and cycleways within Fingal owned parks in recent years with planned continual investment by the Council. The Draft Plan will build on the policy objectives of the current Plan to enhance the level of walking and cycling infrastructure provision across the County, and this will take account of the submissions received, the Greater Dublin Area Cycle Network and the ongoing needs of the County including in particular, the urban centres and areas around transport interchanges. The objectives will include new facilities and retro-fitting of existing facilities. This will also be done to enhance the catchments of the larger public transport interventions referenced above, to support infill and brownfield development, to support Masterplans and LAP, including potential Transit Oriented Development sites and to target road safety, air quality and noise pollution issues.

The recent establishment of the Environment, Climate Action and Active Travel Department shows the Council's commitment to advancing a network of walking and cycling routes which is central to reducing greenhouse gas emissions and benefiting public health. The primary aim of this Department is to make active travel a key feature of the transport network within the County. In this regard, an Active Travel Strategy is currently being prepared in line with relevant national guidance and the new Plan will include supportive policy and objectives in this regard. The potential for a 'walkability audit' of towns will be considered as one of the many elements of data collection to inform a robust decision-making process in the context of advancing active travel proposals within Fingal. It is noted that a review of towns and villages will be carried out by Fingal's Operations Department to assess the potential for a 30kph speed limit in the context of promoting increased active travel. The Council will continue to work closely with the NTA and other stakeholders as required to address the issue of Mode Share targets relating to active travel for consideration in the Draft Plan.

Active travel will be developed within the County by the Council's Active Travel Department through the following mechanisms:

- Repurpose and reuse existing road network, to re-designate space on existing roads for active travel, through the use of one-way systems of roads, thereby utilising existing infrastructure, and rearranging how it is currently used for all modes of travel, with priority to active modes.
- Reconfiguration of carriageway space for the introduction of protected cycle lanes/off road cycle tracks, by reducing lane widths, reconfiguring junctions and providing priority for the vulnerable road users through universal design.
- Enhance the pedestrian and cycle network and implement the GDA Cycle Network Plan in collaboration with the NTA and across departments.
- To enhance the provision of cycle parking throughout the County, in schools, clubs, public spaces in towns and villages.
- To provide connectivity, continuity and legibility to enhance existing infrastructure, make connections to shorten the distance from residential areas to sustainable infrastructure, clubs and amenities, and remove existing barriers to active travel and universal access.
- Safe Routes to School programme; in collaboration with the NTA and An Taisce. The Council will be carry out measures to encourage as many pupils and students as possible in primary and post-primary schools to walk and cycle. The aims of the scheme seek to accelerate the delivery of walking/scooting and cycling infrastructure on key access routes to schools, to provide 'front of school' treatments

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which will enhance access to the school grounds and to expand the amount of bike parking available at schools.

- Publicity and promotions of initiatives to encourage active travel, provision of bike sharing schemes, e-mobility and encouraging cycling for all ages.

This Department will also review the potential for pedestrianisation of specific areas within towns and villages where appropriate and pedestrianisation will also be proposed as part of connectivity enhancements to both existing and proposed cycling/walking infrastructure. Pedestrianisation also requires consideration of servicing, public transport, cyclists, and utilities and is subject to a separate consent process where there are opportunities for public engagement within the different stages of the process to address any issues of concern. Opportunities for increased pedestrianisation will be supported in the new Plan as well as policies supporting the provision of high-quality public realm. With regard to deliveries and servicing, service vehicles and taxis are generally reliant on kerbside space with competition for such space in busy town centres. Where transport schemes are proposed, careful consideration must be given to the operational requirements of service vehicles and taxis. The NTA's recommendation that these requirements should be met in a manner that balances this need with that of sustainable movement are acknowledged and will be implemented where feasible.

Greenways

The Council's Capital Programme for 2021-2023 also allocates significant funding of €146.69m to the development of Greenway infrastructure. This will allow the Council to continue work on delivering key Greenway projects within the County that are currently advancing through planning and design or public consultation stages and with some projects complete or with the benefit of planning permission.

Greenway projects include:

- Fingal Coastal Way
- Baldoyle to Portmarnock Greenway
- Broadmeadow (Malahide to Donabate) Greenway
- Sutton to Malahide Greenway
- Skerries to Balbriggan Greenway
- Rush to Lusk Greenway
- Donabate to Skerries Greenway
- Royal Canal Greenway

As part of the €55m allocation by the National Transport Authority under the Government's July Jobs Stimulus Plan 2020 to support Local Authorities response to Covid-19 challenges and assist with their work to equip local communities and businesses with improved walking and cycling infrastructure, the Council is to commence the roll out of a €3.9m programme aimed at developing safer infrastructure for cyclists and pedestrians in towns and villages across the County.

The provision of any future walking and cycling schemes within the County will need to progress through more detailed feasibility, route options, design and statutory planning processes and more detail will become available as projects advance through each stage. The opportunity for public consultation with the general public, communities, businesses and other stakeholders will be available at different stages throughout the consent process to address any issues of concern. These schemes will also include environmental assessments such as SEA and AA where applicable and will have regard to relevant environmental issues. Fingal County Council also recognises the value of strategic Greenway development increases as it makes other recreational amenities, tourist attractions and towns along the route accessible at the same time. This connectivity also has the capacity to stimulate and increase tourist visitor numbers to Greenways and towns, cultural heritage

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assets and amenities along the route. The new Plan will include policies and supportive objectives acknowledging the importance of maximising the recreational and tourism value of Greenway development including opportunities for linkages to surrounding areas and their amenities including Council owned heritage properties and parks. Such opportunities will be explored and considered in the design of strategic Greenway schemes. The Draft Plan will also recommend policies to promote a collaborative approach to the provision of new walking and cycling infrastructure with landowners, relevant stakeholders and local communities when preparing active travel schemes for such areas within the County.

Public Transport

A modern, efficient and well-integrated public transport network for the County to meet transport demand has been a long-standing objective of Fingal County Council to enable future sustainable growth and mobility and will continue to be a key consideration for the new Plan, in line with national, regional and local policy frameworks. The delivery of the BusConnects, MetroLink, DART + and LUAS Expansion projects is generally via national agencies including TII, NTA and Irish Rail, however, the Council has close cooperation and interaction with these bodies on an ongoing basis to ensure that policy objectives are being addressed through the design process. As such, the Draft Plan will include policies which continue to support the relevant agencies in the development of these key public transport enablers in line with the NPF, NDP and the RSES. These projects promote a high level of network integration and interchange facilities and represent key components of an integrated transport network that will bring significant economic, social and environmental benefits to Fingal and the wider Dublin region. Whilst operational management of the various bus, tram and train services remains a matter for the NTA and the various operators, Fingal County Council continues to work with these stakeholders to ensure an efficient and effective public transport network is achieved and the Draft Plan will include specific objectives in this regard.

Rail

Fingal continues to see MetroLink as a key enabler of sustainable development for Fingal and the wider Dublin and mid-east region. Indeed, the provision of a high-quality service to Dublin Airport will have an impact at a national level and the Draft Plan will include policies to continue to underpin the delivery of this crucial piece of infrastructure.

Fingal County Council will continue to engage with the NTA and Irish Rail to support and facilitate the heavy rail network programme including the delivery of the DART + project that will benefit Fingal and the wider Dublin and mid-east region. The NTA's Implementation Plan 2019 includes the DART Expansion programme, network development, station and other enhancements, including DART + West that will serve communities in the Dublin 15 areas of the County and DART+ Coastal from Malahide to Drogheda that will serve towns along the coastal corridor of Fingal including significant increases in services to the towns of north Fingal. Consultants have been recently appointed to commence the DART+ Coastal design while DART+ West is entering a second-round public consultation phase. The electrification of the Dublin-Belfast rail line to Drogheda will result in improved services to towns such as Skerries and Balbriggan. The delivery of DART Expansion projects is through a separate statutory process with An Bord Pleanála, to which the general public, local communities and stakeholders can directly engage to address issues of concern including impacts on local environments. Any forthcoming guidance from the Department of Transport will be considered and referenced in the Draft Plan. Fingal County Council recognises the strategic importance of the rail network and the specific requirements that Irish Rail has with respect to railway safety. Fingal County Council will continue to work collaboratively with Irish Rail in this regard.

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Bus

The NTA is currently rolling out the BusConnects project which includes new high-quality public transport corridors, enhanced bus services and various other elements including ticketing improvements. The Draft Plan will include policies to underpin this project and ensure that it delivers an appropriately high level of service to all parts of the County. In particular, measures to improve bus user comfort, safety and convenience will be included in the Draft Plan including objectives around bus priority measures, bus stop facilities and public transport interchange. The design of the public transport services and new routes are matters for the regulator i.e. the NTA. A key component of the BusConnects proposals is improved interchange between all modes of public transport. A significant improvement in orbital bus services, including services to train stations and large commercial and educational uses, is also envisaged under the proposals.

The provision of any infrastructural schemes including bus corridors will need to progress through more detailed feasibility, route options, design and statutory planning processes and more detail will become available as projects advance through each stage. The opportunity for consultation with the general public, communities, businesses and other stakeholders will be available at different stages throughout the consent process to address any issues of concern. These schemes will also include environmental assessments such as SEA and AA where applicable and will have regard to relevant environmental issues.

Rural Transport

Maximising accessibility to rural areas within the County through support for rural transport will form a consideration for the new Plan in addressing social exclusion and improving connectivity and mobility within rural areas. The NTA's strategic plan relating to the Local Link Rural Transport Programme and provisions of the NTA's Connecting Ireland Mobility Plan will be acknowledged and supported in the Draft Plan. In this context, Fingal County Council will continue to engage with the NTA and other relevant transport providers relating to the provision of rural transport services. At a more strategic level, the challenge is to ensure a sustainable pattern of development that integrates land use with transport and reduces the need to travel from more isolated areas to key centres of employment and services. Where options are limited in terms of travel from rural areas to nearby urban centres, the Draft Plan will continue to include policies to minimise private car use within urban centres, thereby freeing up road space for those who have limited transport options.

Protection of Strategic Transport Corridors

The importance of existing air, road and rail networks within the County to provide strategically important connections internationally and between other major cities within the country as well as linking to other key urban centres with strong regional functions is acknowledged and supported in the current Plan. National and regional policy objectives seek to protect and enhance global connectivity and regional accessibility which is essential for Fingal to retain and strengthen its economic competitiveness, ability to attract inward investment and its attractiveness as a tourism destination. In this regard, the new Plan will continue to include supporting policies and objectives to acknowledge the importance and facilitate the protection of key strategic transport corridors within Fingal.

Dublin Airport – International Gateway

The strategic importance of Dublin Airport to the Irish economy which acts as the principal international gateway for trade, inward investment and tourism is acknowledged and supported in the current Plan. The Dublin Airport LAP was adopted in January 2020 and this LAP will accommodate the future sustainable growth and development of the Airport lands while also facilitating the efficient and effective operation of Dublin Airport. Critical to the success of this international gateway airport, continued protection of its core transport

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function and improving surface access through targeted investment in transport infrastructure. To protect and support the high-quality international connectivity offered by Dublin Airport, the following key land use considerations for the new Plan in line with National and Regional policy for Dublin Airport include:

- Continued protection of the core transport function of the Airport.
- Enhanced land-side access to Dublin Airport, particularly through public transport provision such as MetroLink.
- Implementation of the recommendations of the South Fingal Transport Study (2019) and
- Careful land use management of land-side areas to focus on the current and future needs of the Airport as key infrastructure for National and Regional development.

Dublin Port

The considerable economic contribution of Dublin Port to the national and regional economy is acknowledged and it is recognised that the Port is a crucial part of the Dublin's strategic economic infrastructure. The Draft Plan will include policies to support the ongoing development of Dublin Port having regard to wider transport and infrastructural considerations for the Dublin region. In particular, this will include policy objectives to manage the TEN-T and national road network to ensure ongoing efficient access for freight from all parts of Ireland to Dublin Port. This includes controlling inappropriate development near to, or that disproportionately impacts on, the national road network including the Dublin Tunnel, the motorway network and motorway interchanges. Provision for inland freight facilities such as logistics hubs and freight depots and storage facilities also play an important role in the ongoing competitiveness of Dublin Port and the Draft Plan will include specific objectives in this regard.

National Roads

Fingal County Council continues to maintain and protect the safety, capacity and efficiency of the strategic road corridors including the strategic M50 and M1 corridors which are of critical importance for the future economic growth of Fingal in collaboration with TII and relevant stakeholders. Specifically, local access to the strategic road network continues to be managed and restricted through the development management process to protect the function of national roads and to discourage use by local traffic for short trips. The Council also continues to collaborate with the NTA and TII towards the implementation of demand management measures on national routes. Policies and objectives to support and facilitate the protection and management of the national road network for the movement of strategic traffic in line with relevant National and Regional policy will be an important aspect of transport policy in the new plan. The Council recognises that the transport network in Fingal is heavily reliant on the safe and efficient operation of the regional and local road network. As such, policies to safeguard this ongoing strategic function will be included in the Draft Plan such as restricting new access points from regional roads and ensuring road design standards are met. Any recent guidance issued by the Department of Transport relating to the national roads network and associated enhancement measures will be considered and referenced in the Draft Plan.

Regional/Local Roads

Fingal County Council recognises that the transport network in Fingal is heavily reliant on the safe and efficient operation of the regional and local road network. As such, policies to safeguard this ongoing strategic function will be included in the Draft Plan such as restricting new access points from regional roads and ensuring road design standards are met.

Provision of the Western Access to the Airport is an objective at national, regional and local level and is supported in the NPF, RSES and current Plan Fingal County Council. carried out the South Fingal Transport

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Study 2019 into the transport network in the South Fingal area including Dublin Airport recommending key transport infrastructure and levels of land use development that will enable sustainable growth within this area leading up to the delivery of MetroLink and beyond. Analysis undertaken as part of the study indicates that a Western Access is likely to be required in the medium term. The provision of any future infrastructural developments including roads will need to progress through more detailed feasibility, route options, design and statutory planning processes and additional details will become available as projects advance through each stage. The opportunity for consultation with the general public, communities, businesses and other stakeholders will be available at different stages throughout the consent process to address any issues of concern. These schemes will also include environmental assessments such as SEA and AA where applicable and will have regard to relevant environmental issues.

Specific area issues relating to traffic management, on-street parking, parking enforcement issues, improvements to existing road surfaces and footpaths, the provision of additional pedestrian crossings, completion of landscaping surrounding completed road schemes, new signage and road markings, regular road/footpath cleaning, provision of street lighting and additional bins on existing roads and the reopening of existing laneways within the County are operational functions and, therefore, are not a matter for the Development Plan. The principle of the issues arising in these areas will be reviewed at a strategic level to ensure that the relevant policies and objectives are in place in the Draft Plan.

Rail Freight

Fingal County Council recognises the potential that exists for the efficient use of the rail network to transport freight. As such, the Draft Plan will consider further whether specific policy objectives are required to support this potential as referenced in the National Investment Framework for Transport in Ireland.

Park and Ride

Fingal County Council will continue to engage with the NTA and other relevant stakeholders regarding the identification and development of Park and Ride facilities at appropriate locations. The zoning requirements and transportation requirements and impacts of such facilities will be considered further in terms of any required policy objectives in the Draft Plan.

Carparking

Car parking standards will be revisited and revised in the Draft Plan to ensure that the provision of parking will continue to be assessed in terms of urban realm, public transport accessibility, traffic impact and other considerations as required. The Draft Plan will also set out more clearly defined policy objectives around the provision of cycle parking for new developments, including accessibility, storage, security and design.

Rights of Way

Section 10(2)(o) of the Planning and Development Act 2000 (as amended), requires the inclusion of a mandatory objective in the Development Plan for the preservation of Public Rights of Way (PROW) which gives access to seashore, mountain, lakeshore, riverbank or other places of natural beauty or recreational utility and PROW's shall be identified both by marking them on at least one of the maps forming part of the development plan and by indicating their location on a list appended to the plan. Section 14 of the Act sets out the formal process for designating Rights of Way in development plans. The scope of these statutory provisions is based on the identification of existing routes over which PROW's are deemed to exist. The preparation of the Draft Plan will address the issue of Rights of Way within the context of the relevant provisions of the Planning and Development Act 2000 (as amended). In the assessment of any planning application for new development,

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the impact on the adjoining amenity is considered and assessed by the Planning Department. This includes any potential negative impact on public access and existing Rights of Way in the County. Fingal County Council acknowledges the importance of PROW's, walking routes, recreational activities and amenities, which add to the amenity of the countryside and, therefore, should be preserved, where possible in the Draft Plan.

CHIEF EXECUTIVE'S RECOMMENDATIONS

- Provide for an integrated approach to land use and ground transportation, aimed at securing a modal shift to more sustainable modes of transport, i.e. cycling walking and public transport.
- Promote land use patterns which reduce the need to travel and support public transport including higher densities at public transport corridors and nodes.
- Support the delivery and integration of key transport enablers to accommodate growth over the plan period and beyond, consistent with the NPF and the RSES, including BusConnects, DART expansion, LUAS extension programmes and MetroLink, while maintaining the capacity and safety of strategic transport networks.
- Work with the NTA, TII, and other transport agencies in developing an integrated set of transport objectives for the County in line with the GDA Transport Strategy and National and Regional policy, encouraging modal shift towards more sustainable modes of transport and patterns of commuting.
- Implement the recommendations of the South Fingal Transport Study 2019.
- Support SMARTER Travel initiatives and ensure that the Draft Plan aligns with the NTA's Transport Strategy for the Greater Dublin Area 2016-2035.
- Seek to implement the provision of the Design Manual for Urban Roads and Streets (2019) in relation to the delivery of safe streets and overall best practice design and promote the principle of filtered permeability.
- Promote and help develop behavioural change initiatives at local level that encourage active travel and modal switch to sustainable transport modes.
- Support the provision of Park and Ride facilities at suitable locations in accordance with proposals set out by the NTA.
- Support the Local Link Rural Transport Strategy.
- Review the standards and the car and cycle parking requirements for residential and non-residential development in line with national planning and transport policy requirements.
- Support the forthcoming 'Dublin Regional EV Charging Strategy' and the growth of Electric Vehicle use as an alternative to the use of fossil-fuel burning vehicles, through a roll-out of additional charging points at appropriate locations.
- Include sustainable transport indicators, including targets for mode share, to monitor the policies and objectives of the plan over its lifetime.

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- Support the set up and operation of car sharing schemes to facilitate an overall reduction in car journeys and car parking requirements.
- Support the ongoing development of Dublin Port having regard to wider transport and infrastructural considerations for the Dublin region.
- Identify existing Rights of Way where possible in accordance with the provisions of the Planning and Development Act 2000 (as amended).

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THEME 4: EMPLOYMENT, ECONOMY AND DUBLIN AIRPORT

Submissions Received:

FIN-C377-7, FIN-C377-13, FIN-C377-30, FIN-C377-58, FIN-C377-59, FIN-C377-61, FIN-C377-68, FIN-C377-72, FIN-C377-77, FIN-C377-79, FIN-C377-80, FIN-C377-87, FIN-C377-92, FIN-C377-93, FIN-C377-96, FIN-C377-97, FIN-C377-101, FIN-C377-106, FIN-C377-109, FIN-C377-110, FIN-C377-111, FIN-C377-112, FIN-C377-115, FIN-C377-137, FIN-C377-142, FIN-C377-146, FIN-C377-147, FIN-C377-148, FIN-C377-149, FIN-C377-150, FIN-C377-152, FIN-C377-159, FIN-C377-160, FIN-C377-161, FIN-C377-163, FIN-C377-167, FIN-C377-170, FIN-C377-181, FIN-C377-184, FIN-C377-186, FIN-C377-188, FIN-C377-201, FIN-C377-202, FIN-C377-209, FIN-C377-212, FIN-C377-225, FIN-C377-226, FIN-C377-237, FIN-C377-238, FIN-C377-243, FIN-C377-244, FIN-C377-246, FIN-C377-251, FIN-C377-256, FIN-C377-257, FIN-C377-261, FIN-C377-263, FIN-C377-267, FIN-C377-269, FIN-C377-275, FIN-C377-276, FIN-C377-278, FIN-C377-281, FIN-C377-284, FIN-C377-285, FIN-C377-287, FIN-C377-291, FIN-C377-293, FIN-C377-295, FIN-C377-296, FIN-C377-297, FIN-C377-300, FIN-C377-310, FIN-C377-313, FIN-C377-320, FIN-C377-323, FIN-C377-325, FIN-C377-330, FIN-C377-333, FIN-C377-334, FIN-C377-341, FIN-C377-343, FIN-C377-347, FIN-C377-351, FIN-C377-352, FIN-C377-356, FIN-C377-359, FIN-C377-360, FIN-C377-371, FIN-C377-372, FIN-C377-376, FIN-C377-377, FIN-C377-382, FIN-C377-383, FIN-C377-386, FIN-C377-389, FIN-C377-391, FIN-C377-392, FIN-C377-398, FIN-C377-401, FIN-C377-402, FIN-C377-403, FIN-C377-411, FIN-C377-413, FIN-C377-416, FIN-C377-417, FIN-C377-418, FIN-C377-420, FIN-C377-422, FIN-C377-430, FIN-C377-435, FIN-C377-438, FIN-C377-441, FIN-C377-450, FIN-C377-451, FIN-C377-455, FIN-C377-462, FIN-C377-463, FIN-C377-469, FIN-C377-472, FIN-C377-474, FIN-C377-475, FIN-C377-481, FIN-C377-482, FIN-C377-485, FIN-C377-487, FIN-C377-488, FIN-C377-490, FIN-C377-491, FIN-C377-494, FIN-C377-498, FIN-C377-505, FIN-C377-506, FIN-C377-507, FIN-C377-508, FIN-C377-509, FIN-C377-522, FIN-C377-527, FIN-C377-539, FIN-C377-542, FIN-C377-548, FIN-C377-550.

SUMMARY OF ISSUES

Economic Development

Several submissions highlighted the need for regeneration of towns and villages in the County and recommended that the 'Town Centre First Strategy' is core to the regeneration of our towns and villages post Covid-19. The submissions emphasized the importance of supporting local businesses, SME's and retail businesses, utilising vacant sites, including historical buildings, and creating multi-use spaces and a fusion of digital and remote working opportunities with traditional shops in town centres. The need to re-imagine the space to attract more residential use, develop the night time economy, increase the spend in the local shops, improve air quality, reduce noise levels, and improve safety for people was recommended in some submissions. Support for existing business owners was a recurring theme throughout the submissions and the point was raised that micro businesses and SME's were the most challenged by the pandemic and should have continued support. More favorable rates and insurance premiums were suggested in a number of the submissions. Providing suitable space/locations to operate, employing local people, creating initiatives that can inspire local participation in local activity and encouraging local organizations to procure and consume more services and products from local providers were also suggested. Submissions called for the need for individual directories for each town, similar to the leaflet produced for Malahide. 'Fingal in it together' was commended and supported in the submissions. Submissions called for campaigns such as 'Love Castleknock' and 'Love Blanchardstown Village' in the D15 area, building on the success of shop local during the pandemic.

Submissions called for the need for high quality public realm space for farmers/open markets/festivals/Healthy food towns in Lusk for example, which promote and celebrate local produce/crafts/foods (e.g. events like Flavours of Fingal /Skerries Mills Market/Meath – Boyne Valley) all year round. This is linked to the submission which called for the need to further encourage horticulture, in particular, organic horticulture in Fingal's rural areas. The new Greenway projects were highlighted in

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numerous submissions and the ability of same to boost Fingal's tourism economy was encouraged. Spinoff effects of the GGreenways through cafes, restaurants, hotels, bike hire were also identified.

Submissions called for the re-intensification of existing business locations, support for the regeneration of underutilised brownfield sites and support for compact, urban growth that allows for higher density development. Numerous submissions called for the creation and facilitation of work hubs, digital hubs, co-working spaces and enterprise centres throughout the County, e.g. Lusk, Rush, Balrothery. It was suggested that these should be located adjacent to key transport hubs such as the planned MetroLink and DART schemes and at Dublin Airport. The impact that Covid-19 has had on office accommodation was also raised. The importance of the Dublin-Belfast Economic Corridor as an economic driver of national significance. Dublin Airport, Dublin Port, the Metro Economic Corridor, The MetroLink and high-quality public transport and road infrastructure are referenced in the submissions and the need to provide for expanded and consolidated employment areas in close proximity to Dublin Airport for example, in line with national, regional and local policy frameworks. The need to align public transport, housing and employment strategies to ensure there is adequate transport links between high-density employment areas and high-density housing areas is noted in the submissions. Facilitating the recovery of aviation by ensuring the Airport is effectively interlinked with Fingal and the Greater Dublin area is supported in the submissions. The potential of Ballyboughal airfield into a small commercial hub and the impacts of relocating (partially or fully) Dublin Port to Balbriggan has been called for.

The importance of clustering and agglomeration economies was raised in the submissions and the need to provide resilient commercial zones which can compete with those in Dublin City Centre. The delivery of MetroLink should inform the location of new employment generating clustering opportunities. A number of submissions have called for a review to be carried out of the existing business/industrial parks in the County to ascertain if they are at appropriate locations and of sufficient size to cater for future demand. The submissions request the provision of a sufficient quantum of appropriately zoned lands to facilitate enterprise opportunities, higher order uses and employment creation which will be coherently located to maximise on existing and planned infrastructure. Some submissions noted the growing demand for logistics, warehousing and data centres and others called for a review of use classes within GE- General Employment and FP- Food Park zoning designations. The commercial potential of the strategic landbank of Dunsink, the role and function of the Swords Pavilions and the need to further consolidate mixed use development at this location, the need to incentivize FDI, the need for flexibility on employment lands, a shortage of GE lands in D15, the need to increase the variety of employment offer within GE zoned lands particularly within Fingal's Self Sustaining Towns have been raised in the submissions. In addition, the submissions highlight the need for higher order uses, such as high technology on strategically located lands along the Sword Roads Corridor, the economic importance and benefits of the quarry and extractive industry, the need for increased employment opportunities/clusters in Howth, Skerries, Blanchardstown and rural north Fingal and the need for an increased number of rural clusters, to support economic development.

Some submissions called for the creation of increased employment opportunities for young people, older people and people with physical and mental disabilities, the provision of further education and training facilities, that large scale employment sites/industrial estates take into consideration the health and wellbeing of workers, promotion of interaction between educational and art institutions and employers and private business and consideration of the lifelong learning needs of the population and the local economy.

A number of submissions sought the development of renewable energy projects, in particular in offshore wind with the potential to provide considerable employment opportunities. Submissions drew attention to the potential opportunities a new green economy can bring and requests the need to recognize the potential of indigenous micro, small and medium enterprises to build viable opportunities over time, for e.g. new green jobs by retrofitting of existing social housing stock, upcycling and repairing.

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Tourism

The tourism potential of Fingal was highlighted in many of the submissions received. The importance of heritage, including multi-cultural heritage, and cultural sites in the County are mentioned throughout. Providing the appropriate facilities in towns/villages and rural areas to promote and encourage tourism was a recurring theme. The link between tourism and economic development was raised in many of the submissions.

The Fingal Coastal Way, Broadmeadow Greenway, the Royal Canal Greenway and Greenways in general were mentioned and supported in a number of submissions and their potential to boost Fingal's tourism economy was noted. The need to include additional facilities/outlets along same to promote economic growth in/near a specific area and partnerships with local businesses was a common theme. For example, providing bike hire facilities, toilet facilities, appropriate accommodation, cafes and restaurants along the route, connections to other towns, such as Lusk and Rush. The development of a Coastal Blueway was also proposed which could take advantage of Fingal's sailing, kayaking and other marine activities to attract visitors. The promotion of coastal and outdoor tourism was called for, pointing to the opportunities for water sports, swimming, wind surfing, sailing, kayaking, and golf in places such as Rush, Howth and Malahide Estuary.

The importance of outdoor experiences has been raised in numerous submissions and this is linked with the requests to provide high quality public spaces in towns and villages. These spaces are requested for farmers markets/open markets/festivals/Healthy food towns in Lusk for example, which promote and celebrate local produce/crafts/foods (e.g. events like Flavours of Fingal /Skerries Mills Market/Meath – Boyne Valley) all year round. Campsites, summer open air, evening musical and theatre events were recommended at existing facilities such as Malahide Castle, Newbridge House and Ardgillen.

The submission from Fáilte Ireland's states that their strategy is to open up the outdoors by re-imagining the urban spaces. The planning and delivery of public realm projects and wider redevelopment e.g. Public Realm Plans, Local Area Plans, etc. must be multi-faceted and facilitate tourism infrastructure and projects in equal measure. The Fáilte Ireland submission also recommended that a dedicated tourism strategy/chapter should be provided in the new Development Plan. The submissions called for creative design and multi-functional use within buildings and public spaces including parks, trails and adjacent to waterbodies which encourage a broader mix of uses.

A number of the submissions called for increased infrastructure/facilities/activities to cater for and attract visitors. These include; Increased signage, advertising, links from Dublin Airport, information App's for heritage/tourist sites, public open space, public toilets in villages and at beaches, safe access to beaches (Balscadden and Rush), marinas, parks, visitor centres and tourist offices, car parking, restaurants, cafes, hotels, eco-friendly accommodation, campsites/ glamping sites, farmers market, open-air events, local food festivals, sporting events, archaeological/heritage and sensory trails. A common theme in many of the submissions was of the need for more support, encouragement and opportunities for local businesses to expand in their area. Promoting the food industry for example in Lusk and linking it in with tourism opportunities is raised.

Harnessing and increasing the tourism potential of a number of cultural heritage sites and specific areas throughout the County was raised. These include Bremore Castle, St. Colmcille's, Holy Well and St. Columba's Church in Swords, Drumanagh, Martello tower and Red Island (Skerries), tram line and Howth Castle in Howth, Malahide Estuary, Rush (Millbank, Coastal Way, Knockdromin and Marina), Balrothery village, Naul (Seamus Ennis centre), Newbridge House, Balbriggan (Bremore Castle) and the Liffey Valley. The submission called for optimising the potential of the ecotourism sector by clustering seasonal uses which are mutually-supportive, ideally close to public transport, to reduce traffic and enhance the quality of visitor experiences in Fingal. The request to target international visitors was raised while the preference for local visitors and a reduction in the

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amount of Airbnb's was voiced in the submissions. The development of the Green in Malahide has voiced concerns in the submission about anti-social behavior in the town.

In Fáilte Ireland's submission, they have stated that they are in the process of preparing Regional Tourism Plans (Q4 2021) which will become primary reference documents to inform Fáilte Ireland's submissions on County and City Development Plans. Fáilte Ireland have also produced 'Development Guidelines for Tourism Destination Towns' to provide a framework to support communities and Local Authorities and set out the key drivers of what makes a town appealing to the international visitor. The protection, enhancement and promotion of our natural and built heritage for the common benefits of visitor, industry, community and the environment is a central theme in Fáilte Irelands submission. Collaboration is requested with Fingal County Council regarding the Coastal Destination Development Plan, the Dublin Coastal Trail and Ancient East.

Rural Development

With regard to the economic development of rural areas, submissions emphasized the importance of revitalising rural communities, providing employment and attracting remote workers to rural communities. The submissions request that Fingal County Council explore opportunities for the further development of international education services and the circular economy, specifically between education institutions and facilities such as Integrated Materials Solutions, which are based in Naul. The promotion of regenerative farming, forestry, local and organic food production and consumption and 'farm to fork' initiatives are highlighted in the submissions. The need to encourage and facilitate the sensitive reuse of vernacular houses or farm buildings for farm diversification, agri-tourism and rural development, including self-catering accommodation, arts or craft workshops and small-scale manufacturing is recommended in the submissions.

The importance of ports, jetties, quays and piers to the local economy as well as their role as recreational and amenity facilities has been voiced in the submissions. Some submissions have requested that additional rural clusters be provided which would help to sustain existing local communities, rural schools and the rural economy. Small-scale enterprises and employment opportunities based on the sustainable use of indigenous local resources, particularly agriculture, are important in building local community resilience. The submissions request that Fingal County Council consider the network of rural villages in north Fingal and the pivotal role they play as service centres for our rural communities and highlight the need for a strategy for sustainable rural transport, for sustainable food production and for a sustainable rural economy. Consideration of 'Our Rural Future -Rural Development Policy 2021-2025' is recommended in the submissions. The development of fertile lands for housing in Rush is questioned.

A rural Greenway network is proposed in the submissions, which would connect rural villages with larger urban centres. This could incorporate a rural economy strategy centred around food production and new rural markets, as well as a heritage tourism, unlocking the potential of rural villages to thrive and grow in line with their potential. This could form part of a sustainable rural transport strategy, as well as address a serious deficit in basic recreational infrastructure in rural areas.

Some submissions request that Fingal County Council examine the needs of rural businesses in terms of the current policies and objectives that relates to existing RB- Rural Business zoned lands and examine the potential for increased employment opportunities in rural North Fingal.

Food industry

Submissions called for the need for sustainable and frequent events/farmers farmer/open markets/festivals/Healthy food towns in Lusk for example, which promote and celebrate local produce/crafts/foods (e.g. events like Flavours of Fingal /Skerries Mills Market/Meath – Boyne Valley) all year

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round. The need to support regenerative agricultural is also mentioned in the submissions, having regard to Fingal's strong food production sector. Also related to this is the request for the Council to work with local producers to develop and facilitate the availability of locally produced, healthy, high quality food and explore the option of providing shared commercial kitchen spaces or production units to assist small enterprises and startup food businesses in the region. The implications of Brexit on the Irish food and beverage industry is raised in the submission, stating that this presents significant opportunities for Fingal to further develop food parks in the County and that further investigation is needed to identify potential solutions to encourage the development of food parks.

Submissions refer to the fact that due to limitations, for e.g. for agri-business, in the Food Park (FB) zoning objective, the vision for these lands has not been realised. The development/rezoning of fertile agricultural lands for housing in the County is questioned in the submissions, including the need to retain market gardening, with particular reference to Rush.

Retail

A recurring theme in these submissions was the need to rejuvenate and reimagine town centres so that they can respond to the trends that have developed as a result of Covid-19. The importance of local retailing and support for same has also been raised and the fact that this has grown significantly over the last 12 months. Reimagining public spaces in towns and villages to attract more residential use, resulting in an increase in spend in local shops is encouraged. It is suggested that supporting outdoor seating, outdoors markets and the use of the public realm should become a positive legacy of the crisis. Utilisation of brownfield and infill sites and using CPO powers where necessary to provide for the sensitive revitalisation of town centres is encouraged.

Linked to this is the request in the submission for a focus on the development of the main street/town centre, rather than out of town retail which has negatively impacted on town and village centres and has had a knock-on impact for built heritage, social capital and quality of life. Measures are suggested to address the use of these facilities.

A number of submissions called of the need for additional retail facilities in towns and villages, for example Lusk, Malahide, Donabate, Portmarnock and Oldtown and the general requirement for convenience retail to support housing and population growth was included in the submissions. A trend that has developed during Covid-19 is the establishment of coffee vendors/ food trucks and it is suggested that these facilities be permitted all year round at beaches for example. Fingal's food industry has been mentioned in a number of submissions. The promotion of this unique industry is encouraged and the need to link it to tourism is emphasised.

Submissions suggest that the current retail policy is out of date and out of sync with the shift to online shopping and it is submitted that Retail Strategies need to be flexible, ambitious and cutting edge to respond to current challenges in a post-Covid-19 environment. A retail review is requested to inform retail policies and the zoning matrix in the Development Plan. Reducing businesses rates was recommended to help the retail sector recover. Reference is also made to Variation No. 2 to the current Development Plan and the commitment by Fingal County Council to reconsider the retail designation of Donabate, Lusk and Rush to reflect the status of these settlements as Self-Sustaining Growth Towns and Self-Sustaining Towns, as defined by the RSES.

A number of submissions have made specific requests relating to retailing such as; areas in the County where there may be under provision of certain types of retailing, recognition of the operational requirements of modern retailers, alterations to Objective ED84, ED40 and ED41 in the current Plan, include a specific policy that explicitly provides that the change of use of retail warehouse units to non-bulky goods comparison and/or convenience uses will not be permitted, a policy which restricts large floor-plate multiples in favour of smaller

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floor-plate local shops, support and promote revitalisation of retail facilities in the Blanchardstown Centre; and further consolidation of mixed use development at the Pavilions, Swords.

Dublin Airport

A number of submissions were received in relation to Dublin Airport. The importance of Dublin Airport to the economy of Fingal is noted and it is requested that Fingal County Council continue to support this strategic asset. The Department of Transport welcomes FCC's acknowledgement of the Airports vital contribution to the continued prosperity of both Fingal and the Country economically. Improved public transport access, increased use and uncongested surface access, including potential connections from the road network from the west and north are of continued importance so as to ensure that the Airport will be able to meet the anticipated future demand from passengers following the recovery of the Aviation Sector.

There are also submissions relating to the impact of the Airport on the surrounding communities/residents of Fingal. In this regard it is recommended that Fingal County Council set up an Expert Group to review the future impact of Dublin Airport development/expansion on the surrounding communities, including those living in St. Margarets, Hollystown and Tyrrellstown and other Dublin 15 areas. The issue of airport noise, vortex damage, impact on human health, sound proofing, night flying outside approved schedules and opposition to the removal of night time restrictions has been raised. Meaningful engagement with all parties is requested.

The addition of the second runway and increased flights at Dublin Airport was raised and that the growth of Airport should provide mitigation to address impacts and account for potential long-term impacts of international travel as we move to Zero Carbon society. The submissions requested that the standards and limitations associated with the Outer Public Safety Zones of Dublin Airport be reviewed as part of the Development Plan process. The need for Fingal County Council to accelerate and prioritize the prompt delivery of key enabling airport infrastructure to ensure the terminal is permitted to handle future volume growth was highlighted and that planning conditions attached to the runway, including limiting aircraft movements at key times be revisited and that any constraints on Ireland's airports have the potential to become constraints on economic growth.

The daa's submission has a number of recommendations with regard to the airport's importance, safeguarding, infrastructure, passenger and aircraft movements, airport planning, environmental performance, access and employment. The Aircraft Noise Competent Authority (ANCA) recommends that the current and projected effects of aircraft noise are adequately considered and addressed in the development plan review, through the continued designation of appropriate and inappropriate permitted land use.

Webinar 3 Employment and Economy

Reference was made to the Dublin-Belfast Economic Corridor, Bremore Port, industrial estates and the future development of the strategic land bank of Lissenhall. Comments were also received regarding self-contained office units, the completion of masterplans and the provision of facilities in rural Fingal.

The issues raised at the Employment and Economy webinar have been dealt with throughout the report.

CHIEF EXECUTIVE'S RESPONSE

Economic Development

The range of issues raised in submissions on location of employment is noted and will be further considered in the preparation of the Draft Plan. The RSES recommends a threefold approach to economic development which requires, sustaining what we have in the immediate term, transforming our enterprise base for longer

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term resilience and building on our strengths to be successful in international trade while managing potential vulnerabilities. The new Plan will aim to do this by fostering economic principles such as clustering, placemaking and smart specialisation and to assess the potential relocation of enterprises that may be better suited to alternative locations.

An objective of the Draft Plan will be to increase employment in strategic locations, providing for people intensive employment at other sustainable locations near high quality public transport nodes, building on commercial and research synergies in proximity to large employers, and activating strategic sites to strengthen the local employment base in commuter towns, in accordance with the RSES. The Draft Plan will continue to support and attract foreign direct investment and small and mediums sized enterprises to the County and ensure there are suitable locations for same. Employment generating uses can be supported through planning to ensure lands are zoned appropriately and to promote the location of the right businesses in the right areas. Fingal County Council's cohesive approach to assisting businesses to locate in Fingal through the co-ordination of support and consultation services and ongoing liaison via the Economic Development Department encourages investment in the County and the expansion of existing business.

The regeneration of our towns and villages will be a major objective of the new Plan and recognition of the Town Centre First Strategy in the Programme for Government, Our Shared Future and its role in the regeneration of towns and villages post Covid-19 will be part of the Draft Plan. A number of economic measures to improve the public realm and increase footfall were implemented during Covid-19 which included the provision of parklets in parking spaces or public footpaths to transform the existing streetscape into a welcoming and attractive community space and also support business to continue to trade and provide an outdoor dining experience to customers. The parklet scheme is further supported by the Failte Ireland Outdoor Dining Scheme, administered by Fingal County Council, which provides funding to businesses to source furniture to support outdoor dining. In addition, to encourage footfall the Council has provided additional bike parking, public toilets, seating, litter bins and litter patrols and the extension of Bleeper Bikes Scheme and the lighting up of public buildings during Halloween/Christmas etc. Fingal County Council undertook public consultation in relation to the potential pedestrian of certain streets in towns across the County i.e. New Street, Malahide, Harbour Road, Skerries. A Countywide Shopfront Improvement Scheme to encourage local businesses to improve their street frontages and revitalize Main Streets across the County is also promoted. An additional 2,000 dining seats (based on a single setting) have been created to enable an Outdoor Summer.

Funding has been recently received for two regeneration projects in Swords (Sustainable Swords) and Balbriggan (Our Balbriggan Rejuvenation Plan) which will be flagship projects for the County. Regeneration and healthy placemaking will be key factors when preparing the new Plan in order to ensure that we create healthy and attractive places to live and work and to ensure that lands are used to their full potential. Initiatives such as public realm planning will also support towns in garnering local community spirit and improving the public areas making towns more attractive for businesses and tourism. In addition, the Town & Village Renewal Scheme delivered a number of town improvement projects across the County and the Dublin Rural LEADER Programme has also allocated funding to projects in towns and villages in rural Fingal. The Department of Rural and Community Development DRCD funded Community Enhancement Programme supported local community and voluntary groups with small capital improvement projects throughout the County.

The submissions raised the importance of supporting local businesses and Fingal County Council will continue to include measures to promote and sustain same. Working in partnership with Chambers of Commerce in the County, the Council launched the 'Fingal In It Together' (FIIT) Charter during Covid-19 to support businesses in advance of reopening as public health restrictions eased. Bespoke brochures were produced for towns and villages and distributed to residents of those towns and villages to highlight the businesses that were in their locality and to encourage residents to #ShopFingal. In the run up to Christmas 2020 online retail space opened

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for local businesses to advertise their products as part of the FIIT Programme. An online business directory is also available on the Council's website under the Fingal In It Together website. The Council is now developing an 'App' to further assist businesses in marketing to their customers. During Covid-19, the Council funded the development of the Shoplocal.irish website which promoted businesses which provided order and collection and delivery services in the local areas which won the Chambers Ireland Excellence in Local Government Award in the Supporting Sustainable Communities Category.

Regarding work hubs, Fingal County Council three Enterprise Centres offer shared workspace and remote working options. All three Enterprise Centres continue to expand and develop their offering subject to demand. The Council has undertaken an audit of its existing public buildings to determine the potential to provide additional remote working facilities and has commenced an audit of its space to determine the potential for the delivery of co-working/remote-working space in Council buildings across Fingal. Fingal County Council has also launched the Sustainable Fingal campaign to liaise with and assist businesses in developing/expanding in the green/circular economy.

Fingal County Council promotes clustering through its planning policy and through ongoing engagement with the Industrial Development Authority (IDA) and existing and potential businesses as they assess Fingal as a place to locate their business. The Council markets its industrial lands directly to interested parties through strategic regional and national partnerships. Clustering is being promoted in particular as part of the Dublin-Belfast Economic Corridor proposition which is a strategic partnership with 8 Local Authorities in total and 2 universities. Fingal County Council is also promoting the Dublin 15 industrial lands through marketing the Dublin Enterprise Zone to clusters in pharmaceuticals and healthcare and Information and Communication Technology (ICT) and as part of the Smart Balbriggan proposition will market Balbriggan for ICT clustering.

Fingal County Council prepared the Fingal Skills Strategy in 2019 and has an Implementation Group which is now looking at the implementation of the recommendations of that Strategy in light of a post-Covid-19 environment. The Implementation Group has representatives from a number of sectors i.e. retail/logistics/construction and representatives from the education sector who are liaising on the future skills and educational needs of the population of Fingal. The Fingal Social Inclusion Community and Activation Programme (SICAP) provides services/programmes in these areas and the Our Balbriggan Rejuvenation Plan Education Pillar is also examining educational needs of Balbriggan Town. The aforementioned will be considered in the preparation of the new Plan.

Engagement with the Economic Development Section and other relevant stakeholders will be imperative for the formulation of policies and objectives regarding all aspects of economic development in Fingal.

Tourism

The issues raised in the submissions in relation to tourism have been noted, including the detailed submission from Fáilte Ireland. Many of these are area or site specific and provide FCC with invaluable information regarding local attributes and the potential of same. The impact of Covid-19 on tourism has been significant and the Government has pledged to prioritise a domestic tourism campaign to promote staycations. In addition, the Economic Recovery Plan 2021 includes the extension of 9% VAT rate for the tourism and hospitality sector.

Tourism is one of Fingal's most important economic drivers which is fully embraced by the Council. The Council is custodian and owner of many heritage sites (Malahide Castle, Malahide Casino, Newbridge House, Swords Castle, Ardgillan Castle and Skerries Mills to name a few) and has invested considerable capital to safeguard their future ensuring they can be used by the public. Other heritage properties such as Shackleton Mills and and Bremore Castle are being considered for future development.

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The Council has operators which promote the properties open to the public. In addition, the Council's programme of public events (Arts, Events, Creative Ireland, Crinniú na nÓg, etc) promote and animate heritage and cultural sites throughout the County.

The Council's Tourism Officer collaborates with local tourism groups throughout the County and there are a number of tourist offices promoting Fingal as a destination for tourism. They work closely with Fáilte Ireland on the 'Dublin' brand ensuring that Fingal is promoted as a destination. Fingal County Council also invests considerable resources to promote both heritage and cultural sites through its marketing and promotional campaigns which is evidenced by last year's national radio campaign for day-trippers and staycationers to visit Fingal.

Festivals, markets, improved outdoor and public realm spaces including the promotion of outdoor activities are all noted. A number of economic measures to improve the public realm and increase footfall were implemented which included the provision of parklets in parking spaces or public footpaths to transform the existing streetscape into a welcoming and attractive community space and also support business to continue to trade and provide an outdoor dining experience to customers. The parklet scheme is further supported by the Fáilte Ireland Outdoor Dining Scheme, administered by Fingal County Council, which provides funding to businesses to source furniture to support outdoor dining. In addition, to encourage footfall the Council has provided additional bike parking, public toilets, seating, litter bins and litter patrols and the extension of the Bleeper Bikes Scheme and the lighting up of public buildings during Halloween/Christmas etc. Fingal County Council undertook public consultation in relation to the potential pedestrianisation of certain streets in towns across the County i.e. New Street, Malahide, Harbour Road, Skerries. FCC has a Countywide Shopfront Improvement Scheme to encourage local businesses to improve their street frontages and revitalize Main Streets across the County. An additional 2,000 dining seats (based on a single setting) have been created by FCC to enable an Outdoor Summer. The Best Practice Guidelines – Outdoor Dining and Urban Animation, issued by Fáilte Ireland will provide guidance with regard to appropriate policies and objectives to deal with the increased need and desire for these outdoor spaces.

One of the goals of the Fingal Agri Food Strategy is to create a Fingal food and drink tourism destination to provide an enhanced consumer/tourist experience for the region and help its towns and villages achieve destination status. The Council has commenced this strategy and has developed the 'Dublin's Coast & Fields' brand. A stakeholder network has been established, working with a consultant from Fáilte Ireland to progress and develop actions and alignment with Fáilte Ireland's Food and Drink Strategy 2018 – 2023.

The need to promote and develop the tourism of Fingal's heritage has previously been identified and acknowledged in the current Plan, the Heritage Plan 2018-2023 and the Fingal Tourism Strategy. The Council has developed Heritage Signage and Trails Guidance which encourages a holistic approach to interpretation through the use of heritage audits and interpretation plans. Objectives to support this strategy should be incorporated into the Draft Plan. The Council is currently working with Smart Dublin on developing and rolling out digital Heritage and Walking trails. The Council's main Heritage properties' operators have developed audio guides for the properties and ensure that their websites are updated regularly. Any tourism development of Fingal's heritage should be carefully considered and carried out in a sensitive and sympathetic manner so that it does not negatively impact on the heritage asset.

The consultation processes for the Fingal Coastal Way route and Royal Canal Greenway recently commenced and the detailed design of the Broadmeadow Greenway is ongoing. Objectives to support these Greenway projects and further projects will be incorporated into the Draft Plan. The Fingal Tourism Office operates a number of Tourist Information Offices in Howth, Malahide, Swords, Balbriggan and Ardgillan Castle and pre Covid -19, assisted in excess of 350,000 visitors annually. The Council runs a number of programmed public

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events (Arts, Events, Creative Ireland, Crinniú na nÓg, Sports, etc). It also provides funding to groups to run events including festivals, open-air, food festivals. The Council's annual Flavours of Fingal show attracts over 80,000 people over the weekend and among the many aspects of the event show-cases food produce of Fingal.

Sustainable measures to ensure the recovery and promotion of the tourism sector will be imperative in the Draft Plan. FCC will ensure that the policies, objectives and measures identified in the Fingal Tourism Strategy 2015-2018 and The Tourism Strategy 2017-2022 are aligned with and supported by policies and objective in the Draft Plan. The Council continue to collaborate and work with Fáilte Ireland on the Destination Towns for Skerries, Coastal Destination Development Plan, the Dublin Coastal Trail and the Dublin Brand. In addition, the Council work with Waterways Ireland in the delivery of their programmes that cross into the Fingal area. Developing the tourism market throughout the County is imperative and this must be done in a sustainable manner that does not impact negatively on the areas natural resources and we must ensure that the capacity of the landscape to absorb tourism activities is not exceeded. The built heritage will be protected and promoted, ensuring that the historic houses, demesnes and archaeology of Fingal can be enjoyed and experienced by tourists and residents alike. Fingal County Council welcome the publication of Fáilte Ireland Regional Tourism Plans.

Rural Development

The need to revitalise and sustain rural communities by attracting more people and businesses into rural towns and villages is noted in the submissions. The Council acknowledges that the development of rural enterprise and employment opportunities will be vital to sustaining the rural economy. It is acknowledged in the RSES that rural areas are facing many challenges. These range from urban generated pressures to a declining and ageing population in some areas. There are also the issues such as changes to the rural economic structure and a lack of access to infrastructure and new technologies. Fingal County Council will continue to support the Dublin Rural LEADER Programme and the Town and Village Renewal Scheme which supports projects in the small towns and villages of the County.

Managing and sustaining the growth of rural communities and economies will require balanced measures to ensure the landscape and natural heritage of these rural areas is protected while also promoting the economic development in these areas. The link between rural areas and tourism is highlighted in the submissions and these will be cross cutting themes in the Draft Plan. The policies and objectives relating to rural development will align with those indicated in the RSES and Our Rural Future - Rural Development Policy 2021-2025. FCC will continue to support existing rural employment and commercial enterprises and will continue to promote and encourage appropriately scaled enterprises, in conjunction with the LECP and LEO.

The Town and Village Renewal scheme is an initiative under the Government's Action Plan for Rural Development, Realising our Rural Potential, and is part of a suite of national and local support measures to rejuvenate rural towns and villages throughout Ireland. Projects approved range from tourism and heritage initiatives, and other enhancement measures aimed to help make small towns and villages more attractive and more sustainable places in which to live and work. Fingal County Council will continue to facilitate and support such initiatives in the new plan.

Fingal is renowned for its agri-food and horticulture sectors which make a significant contribution to employment in rural areas, being a pivotal source of enterprise creation and opportunities. All of these sectors will play a vital role in the rural economy in the future and the new Plan will include appropriate policies and objectives to support and develop rural enterprises.

The Council is developing a network of Greenways along its coastal corridor which will provide transport and tourism connections to a number of rural towns and villages with the potential for additional routes to other

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rural villages in the future. North Fingal has a strong agri-food industry and these Greenways have the potential to strengthen the agri-food sector in these towns and villages.

Food Industry

The importance of the food production sector to Fingal is noted and the promotion of same by the provision of farmers markets, food festivals, health food town initiatives are welcomed in the submissions. Showcasing the food and craft products of the County has gained much support and the policies and objectives required to support same will be assessed for the Draft Plan. Fingal county Council can support food producing lands through zoning and ongoing support of the agri-food industry and marketing of Fingal's strong agri-food sector.

Fingal's Agri food strategy and a food brand – Dublin's Coast and Fields is noted and Fingal County Council engages with key stakeholders in the Agri food sector to ensure their needs are met. The importance of the Agri food sector to the local and national economy are paramount and the new Plan will include appropriate policies and objectives to ensure that these Agri food businesses continue to grow and thrive.

In relation to the submission regarding the use classes permitted in FP zoned lands, a review of all zonings and use classes will be undertaken as part of the preparation of the Draft Plan process.

Retail

The submissions regarding the retail sector are noted and the challenge facing this industry is acknowledged. In order to achieve the right balance and to ensure our town and village centres survive and thrive into the future, there is need to develop a retail hierarchy and strategy that is specific to Fingal's needs. The Retail Strategy for the Greater Dublin Area 2008 was prepared by the Dublin and the Mid-East Regional Authorities (now dissolved). The retail hierarchy as expressed in the GDA strategy is substantially reflected in current City and county development plans and is presented in the RSES. The RSES outlines that EMRA will support and drive the preparation of a new retail strategy for the Region under the requirements of the Retail Planning Guidelines for Planning Authorities 2012, or any subsequent update, to update this hierarchy and apply floorspace requirements for the Region. The Draft Plan will support this approach and work with EMRA regarding same.

Retail plays a key role in defining an area or town/village centre, supporting the overarching theme of placemaking. This was raised in numerous submissions and the role of our town centres, small towns, villages and local centres needs to be re-examined. Fingal County Council has taken a proactive approach to improving the attractiveness of towns and villages in Fingal post Covid-19 with schemes to upgrade the public realm with the provision of planting, seating, bike parking, parklets, toilets and pedestrianisation of some streets to encourage footfall and the encouragement of outdoor public realm space by citizens.

Consumer behaviour has changed dramatically and policies and objectives in the Draft Plan will take account of this. Given Fingal's location within the Eastern and Midland Region it is likely that new and innovative retailing formats will seek to establish in Dublin and policy must be sufficiently flexible to consider these where appropriate. Taking a Town Centre First approach to development is key for revitalising our towns and villages, making them vibrant places to live, work, shop and do business in. The creation of additional outdoor dining facilities is bringing increased footfall to our towns and villages and is showing an increased spend in retail. Fingal County Council is currently reviewing its Casual Trading Bye-laws with a view to expanding the number of locations available to independent vendors with a coffee/food offering at popular locations. The new Plan will consider the changing nature of the retail sector when formulating policies and objectives relating to same.

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In relation to the submissions regarding the use classes, retail designations and specific policies, a review of all zonings, policies and use classes will be undertaken as part of the preparation of the Draft Plan process.

Dublin Airport

Dublin Airport plays a significant role in terms of employment generation, efficient functioning of the wider regional economy and the ability of Ireland as a whole to travel and trade with the rest of the world. The current Plan highlights both the international and national importance of Dublin Airport in the country's transportation network. The promotion of Dublin Airport as a secondary hub in tandem with required infrastructure and facilities will continue to be promoted in the Draft Plan in line with national government policy. Its paramount significance as an economic entity in Fingal and the region, and its ability to drive economic development and generate direct and indirect forms of employment will be a key consideration during Plan preparation.

Fingal County Council will continue to support the proposed MetroLink project which will run from Swords and the Airport to the City Centre. There is ongoing liaison with NTA regarding the design of the BusConnects Core Bus Corridors project. The impact of Covid-19 has been detrimental on the aviation sector and the Council will continue to support Dublin Airport as a key national asset to Ireland's economic success by ensuring appropriate policies and objectives are contained in the new Plan.

Formal engagement between Fingal County Council, the daa and neighbouring airport communities occurs through a number of ongoing platforms such as the Dublin Airport Environmental Working Group [DAEWG] and Community Liaison Group [CLG]. The DAEWG provides focus on the matters relating to the monitoring of airport noise, flood risk, air quality and the growth of the Airport. The [CLG] is another important forum to further engagement specifically with the local community of St. Margaret's which is located immediately to the west of the Airport lands. This forum provides the opportunity for the Council, DAA and the community of St. Margaret's to communicate in an open and transparent manner. The key focus is on creating an engaging and collaborative forum that discusses issues of relevance to the area, particularly in the context of airport growth and operations. Fingal County Council is the nominated Airport Noise Regulator.

Fingal County Council will continue to engage with local communities that are likely to be affected by the growth of the Airport.

CHIEF EXECUTIVE'S RECOMMENDATIONS

- Support economic growth within the County through strengthening and promoting the strategic importance of major urban centres of Swords, Blanchardstown and Balbriggan and of key employment locations such as Dublin Airport and Dublin 15.
- Maximise the economic potential of Fingal's unique strengths and advantageous position within the Eastern and Midlands region.
- Actively seek and facilitate continued opportunities for investment in and development of FDI and indigenous enterprises at appropriate locations in the County.
- Ensure there are sufficient quantum and appropriate types of lands zoned for commercial, enterprise and/ or industrial uses in urban and rural located centres in accordance with the Settlement Hierarchy.

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- Prioritise locating quality employment and residential developments in proximity to each other in order to reduce the need to travel and ensure that suitable local accommodation is available to meet the needs of workers in the County.
- Ensure locating employment intensive land use zonings proximate to high capacity public transport networks and links thereby reducing reliance on private car transport.
- Consider the allocation of various sizes of land parcels for commercial, office, industrial uses in order to cater for a wide range of employment and enterprise formats.
- Liaise and engage with all relevant public service providers to ensure that zoned lands are serviced in a timely fashion to facilitate opportunities for employment and enterprise creation.
- Utilise the measures and powers available to Fingal to encourage and promote the regeneration of areas in need of renewal, for instance in underperforming or outdated commercial and/ or industrial areas.
- Support and protect existing rural economies such as valuable agricultural lands to ensure sustainable food supply, to protect the value and character of open countryside and to support the diversification of rural economies to create additional jobs and maximise opportunities in emerging sectors, such as agri-business, renewable energy, tourism and forestry.
- Support the delivery and integration of key transport enablers to accommodate growth over the plan period and beyond, consistent with the NPF and the RSES, including BusConnects, DART expansion, LUAS extension programmes and MetroLink, while maintaining the capacity and safety of strategic transport networks.
- Support and reinforce the retail strategy within the county having regard to the RSES, or any superseding regional retail strategy, and explore the opportunity to strengthen the retail function in Fingal's towns and villages.
- Facilitate and promote the development of tourism in the County and ensure that the appropriate policies, objectives and measures identified in the Fingal Tourism Strategy 2015-2018 and The Tourism Strategy 2017-2022 are aligned with and supported by policies and objectives in the Draft Plan.
- Balance protecting the landscape and natural heritage of rural Fingal with the need to harness and promote economic opportunities associated with rural life such as agricultural, horticultural, tourism and rural-related economic uses.
- Support and facilitate the towns and villages outdoor markets in towns and villages in Fingal.
- Encourage and provide for industry specifically linked to food, agriculture and the development of added value opportunities in these areas.
- Support the objectives and actions of the Fingal Agri-food Strategy 2019-2021.
- Liaise and coordinate with Fingal's Local Community Development Committee and Local Enterprise Office to ensure that the appropriate objectives, measures and actions included in the Local Economic Community Plan are supported by policies and objectives in the Draft Plan.

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- Support the ongoing and continued engagement with neighbouring airport communities to ensure that the environmental impacts associated with the development proposals are carefully managed and mitigated through land use planning and environmental monitoring and review processes.
- Promote and facilitate different work practices that have developed recently and continue to support the existing co-working facilities throughout the county.
- Have regard to the recommendations of the Fingal Skills Strategy and support the delivery of the actions therein.
- Continue to support the Dublin Rural LEADER Programme and the Town & Village Renewal Scheme.

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THEME 5: CULTURAL HERITAGE

Submissions Received:

FIN-C377-1, FIN-C377-7, FIN-C377-13, FIN-C377-53, FIN-C377-59, FIN-C377-70, FIN-C377-71, FIN-C377-72, FIN-C377-80, FIN-C377-83, FIN-C377-84, FIN-C377-87, FIN-C377-89, FIN-C377-93, FIN-C377-97, FIN-C377-100, FIN-C377-101, FIN-C377-106, FIN-C377-109, FIN-C377-115, FIN-C377-118, FIN-C377-129, FIN-C377-133, FIN-C377-142, FIN-C377-144, FIN-C377-146, FIN-C377-150, FIN-C377-167, FIN-C377-170, FIN-C377-171, FIN-C377-176, FIN-C377-179, FIN-C377-181, FIN-C377-188, FIN-C377-193, FIN-C377-196, FIN-C377-209, FIN-C377-210, FIN-C377-213, FIN-C377-216, FIN-C377-218, FIN-C377-222, FIN-C377-225, FIN-C377-237, FIN-C377-241, FIN-C377-243, FIN-C377-246, FIN-C377-254, FIN-C377-261, FIN-C377-263, FIN-C377-265, FIN-C377-269, FIN-C377-275, FIN-C377-279, FIN-C377-281, FIN-C377-286, FIN-C377-289, FIN-C377-292, FIN-C377-295, FIN-C377-296, FIN-C377-297, FIN-C377-301, FIN-C377-304, FIN-C377-305, FIN-C377-321, FIN-C377-325, FIN-C377-327, FIN-C377-330, FIN-C377-331, FIN-C377-333, FIN-C377-335, FIN-C377-347, FIN-C377-354, FIN-C377-357, FIN-C377-359, FIN-C377-362, FIN-C377-366, FIN-C377-370, FIN-C377-376, FIN-C377-379, FIN-C377-390, FIN-C377-403, FIN-C377-409, FIN-C377-410, FIN-C377-416, FIN-C377-417, FIN-C377-418, FIN-C377-420, FIN-C377-428, FIN-C377-430, FIN-C377-438, FIN-C377-440, FIN-C377-450, FIN-C377-451, FIN-C377-455, FIN-C377-456, FIN-C377-468, FIN-C377-469, FIN-C377-477, FIN-C377-479, FIN-C377-481, FIN-C377-482, FIN-C377-483, FIN-C377-485, FIN-C377-486, FIN-C377-487, FIN-C377-491, FIN-C377-493, FIN-C377-494, FIN-C377-495, FIN-C377-498, FIN-C377-505, FIN-C377-506, FIN-C377-507, FIN-C377-508, FIN-C377-522, FIN-C377-523, FIN-C377-527, FIN-C377-537, FIN-C377-542, FIN-C377-548

SUMMARY OF ISSUES

Archaeological Heritage

There was significant support in the submissions for enhancing the protection of archaeological sites and improving for accessibility. A detailed submission from the Department of Tourism, Culture, Arts, Gaeltacht, Sports and Media requests the inclusion of a definition of archaeology and policies and objectives encompassing relevant legislation, protection and promotion of archaeological sites, increased accessibility and interpretation of archaeological sites, increased awareness and protection of maritime sites, preservation in situ, development control, and climate change.

There was significant support for the successful Community Archaeology programme and requests for it to be expanded.

Architectural Heritage

A number of submissions requested that built heritage is considered as an integral part of the wider built environment and should be dealt with holistically throughout the Draft Plan. The importance of the historic maritime towns and villages and their infrastructure to the evolving national maritime strategy was highlighted.

One submission noted protection and incorporation of protected structures into any future development proposals as paramount and will assist in the immediate establishment of site identity and character. Two submissions requested the alignment and integration of the related UN Sustainable Development Goals into the Draft Plan.

One submission submitted that the Draft Plan should seek to designate more Architectural Conservation Areas (ACAs) and Special Planning Control Schemes; S.48 development levies for Protected Structures should be

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waived to encourage sensitive reuse and adaptation. The Architectural Heritage Protection Guidelines for Planning Authorities to be implemented in full; The Draft Plan should include policies for monitoring buildings at risk and serve notices of endangerment to negligent property owners.

Record of Protected Structures (RPS)

The majority of submissions called for a proactive approach in the preservation of Protected Structures through support and enforcement. A number of clarifications were requested. Requests were received for the following sites to be added to the RPS; Kettles homestead on Kettles Lane, Swords; Railway Keepers' Cottage, Porterstown, Clonsilla; R.C. Chapel on School Lane Balrothery; Bellingham farm Howth; Royal Canal; Old Forge, Clonsilla; Abbotstown House; Old School in Clonsilla; structures from Ring Common and district; and the following from Howth-Howth House; Columbanus Hall, Bailey Court hotel and Coach house facades, Band Hall, Howth Library, Old Courthouse; St. Fintan's ruined Church; Mudoak Cottage; Tramway Cottages; Eire 6 sign; Historic doorways, gateways and kissing gates, entrances to old rights of way.

Architectural Conservation Areas (ACAs)

There were numerous requests for the enforcement of the ACA in Malahide; greater enforcement of the ACA in Castleknock and a request for an explanation for Skerries ACA. The following requests for additions to the ACA were received; front parts of the vernacular cottages at Sherlock Terrace, Skerries; Balcadden Road Howth; Clonsilla and Ring Common.

Heritage-Led Regeneration

There were multiple submissions in support of the protection and regeneration of the historic town and village cores as well as heritage-led regeneration schemes. A number of submissions called for engagement with local communities regarding regeneration and to promote awareness. There was a request to recognise and facilitate the enhancement of the unique identity, character and built heritage of Fingal's towns and villages, through positive placemaking, underpinned by good urban design to create attractive public spaces that promote and facilitate positive social interaction with the built heritage.

There was significant support for the retention and reuse/repurpose of traditional and historic buildings and policies promoting productive reuse of these assets as relevant as well as viability and flexibility in consideration of options for restoration. There were calls to explore commercial opportunities to make better use of heritage buildings, particularly disused buildings and to consider incentives for owners and assistance with maintenance and repair work.

One submission requested that Fingal County Council carry out an assessment to establish which traditional and historic buildings would be most suited to community spaces or working hubs

A number of submissions called for sustainable use or action on specific sites including Skerries Martello tower, Rush Harbour, Rush Main Street, Guinness Bridge, Shackleton's Gardens, Ashtown and Shackleton's Mills. One submission requested that local water pumps be considered items of local interest and heritage and be preserved and protected and another that a plan is put in place to keep thatched cottages from disappearing.

Funding Schemes

A number of submissions called for the "Stitch in Time" grant available to owners to be made available on a smaller scale to local and community groups and for a funding scheme to assist owners to be developed. A

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number of submissions requested Fingal County Council to continue to actively engage with owners of traditional and historic buildings to let them know when funding projects become available.

Heritage Demesnes

A submission recommended the most significant demesnes and designed landscapes in the County should be identified and planning policies applied to maintain and enhance their special character and significance in considering agricultural, recreational or other development.

Climate Change

A submission received sought to ensure the alignment and integration of objectives of the Fingal Climate Action Plan in the Heritage chapters of the Draft Plan, while ensuring climate change measures are not detrimental to heritage assets.

Support was expressed for Fingal County Council's lead on climate change assessment that will provide a focus to the vulnerability of key heritage assets in the built environment and support the development of a range of measures to address climate change challenges that will be transferable to other Local Authorities.

Cultural Heritage

Multiple submissions expressed widespread support for the continued promotion of the Irish language and the linguistic and intangible cultural heritage of the County, for example through the use of historic names in the naming of new developments. Greater use and visibility of the Irish Language was supported in numerous submissions, such as the use of Irish on shopfronts. A number of submissions highlighted providing an environment where engagement with the language could be nurtured with the establishment of Coiste Gaeilge Fhine Gall and Irish Language centres across the County.

There were multiple submissions supporting the promotion of traditional music, arts and culture at centres such as the Seamus Ennis Arts Centre and through arts and Irish Traditional Music Festivals/weekends; Development of heritage 'hubs' with space for local crafts people to demonstrate skills and sell products and construction of poetry corners/benches in the towns and villages are requested. The use of existing cultural and heritage settings in more diverse ways such as to facilitate health and wellbeing group. There were a number of submissions on culturally appropriate engagement with new communities, youth engagement through cultural and arts programmes, events and provision of facilities.

Heritage Tourism/Signage

There were numerous requests for apps, heritage signage and heritage trails with a view to improving tourism potential at local and regional levels including the Donabate-Portrane Peninsula, St. Colmcilles, Holy Well and St. Columbas Church in Swords, Drumanagh Promontory Fort, Lusk, Martello tower and Red Island, Skerries, Howth tram line and Howth Castle, Malahide Estuary, Rush (Millbank and Knockdromin), Balrothery village, Naul, Newbridge House, Balbriggan and Bremore Castle, Clonsilla, and the Liffey Valley. There were multiple submissions that heritage information should be integrated with greenways and the Coastal way.

World Heritage Objective

A request was received to add Howth and Drumanagh Promontory Fort to the World Heritage Tentative List.

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Liaison with Local Authorities

It was requested that the Landscape Character Assessment document, the list of Protected Views and Prospects, the Record of Protected Structures, Monuments and Sites of archaeological importance, all contained in the Draft Meath County Development Plan 2021-2027 be reviewed in developing policies and objectives that may have an impact beyond the Fingal Administrative Boundary and into County Meath.

Webinar 2: Heritage and Green Infrastructure

The review of the Record of Protected Structures was highlighted as were streetscapes and Architectural Conservation Areas. Protection of heritage, historical demesnes and trees is required. The reduction of mowing regimes for green areas was requested. Interpretation of heritage for a tourist audience was highlighted. Measures for coastal management and protected were also highlighted.

The issues raised in the Heritage and Green Infrastructure Webinar have been dealt with throughout the report.

CHIEF EXECUTIVE'S RESPONSE

Archaeological Heritage

The contents of the submissions are noted. The Council is committed to the preservation of its archaeological heritage, and the Draft Plan will address this issue. The existing policies, objectives and development management standards for archaeological heritage in the current Plan will be reviewed, updated and augmented and will inform the preparation of the Draft Plan. New national policy documents such as the forthcoming Heritage Ireland 2030 will also influence and direct the content of the Draft Plan.

The current plan contains an objective in regard to Community Archaeology. This will be reviewed and augmented if appropriate in light of the submissions.

Architectural Heritage

It is agreed that the Council should take a more holistic approach to weaving certain core concepts and policies throughout all sections of the Draft Plan and not just containing them to specific chapters. One of these core concepts will be ensuring and supporting sustainable development. The retention and re-use of the older building stock of the County is fundamental to this.

Policy and objectives to safeguard and encourage appropriate and well-designed re-development of historic buildings, vernacular houses or complexes, Protected Structures, modern buildings of significance in both rural and urban settings will be incorporated throughout the Draft Plan. The Council will be directed by the UN Sustainable Development Goals (11, 12, 13) with regard to this. New national policy documents such as the forthcoming National Policy on Architecture and Built Heritage Strategy will also influence and direct the content of the Draft Plan.

Proposals for new ACAs will be examined in the preparation of the plan based on the criteria set out in Part IV of the Planning and Development Act 2000 (as amended) and the direction within the Architectural Heritage Protection Guidelines for Planning Authorities (2011). Provisions already exist within Fingal's Development Contribution Scheme for exemptions or reductions for development to Protected Structures that adheres to certain criteria. This scheme is independent of the Development Plan. The Council uses a variety of measures to address vacancy, dereliction and risk to historic buildings and will pursue proactive approaches where possible.

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Record of Protected Structures (RPS)

The requests for additions and deletions to the Record of Protected Structures (RPS) are acknowledged. A Review of the RPS is being carried out prior to the preparation of the Draft Plan and the individual proposals will be considered as part of that review. It should be noted that a number of the structures requested are already Protected Structures and so do not need to be assessed again.

- RPS No. 567 The Old Courthouse, Harbour Road, Howth, Dublin 13
- RPS No. 575 St. Fintan's Church & Graveyard, Carrickbrack Road, Sutton South, Dublin 13
- RPS No. 683 Abbotstown House, National Sports Campus, Abbotstown, Dublin 15
- RPS No. 699 Keeper's Cottage, Porterstown Road, Clonsilla
- RPS No. 700 Former Clonsilla School, Porterstown Road, Clonsilla
- RPS No. 774 Martello Tower, Shenick's Island, Skerries
- RPS No. 944a to 944d Royal Canal (including 10th, 11th & 12th Locks), Ashtown to St. Catherine's Park.

Some others already have protection on the exterior of the building through their location within the boundaries of an Architectural Conservation Area. Anomalies such as a double entry will be addressed. Recommendations for the inclusion of a structure on the RPS will be considered against the categories of special interest (architectural, historical, artistic, cultural, scientific, social or technical interest) set out in the Planning and Development Act, 2000 as amended. Any structure proposed for removal from the RPS will be assessed using the same procedure.

Architectural Conservation Areas (ACAs)

There are 32 no. ACAs already existing in Fingal. Proposals for new Architectural Conservation Areas (ACAs) will be considered in the preparation of the Draft Plan. They will be assessed having regard to relevant criteria set out in Part IV of the Planning and Development Act, 2000 (as amended) and to direction with the Architectural Heritage Protection Guidelines for Planning Authorities (2011).

The existing policy, objectives and development management standards for ACAs in the current Development Plan will be reviewed and augmented if appropriate in light of the submissions. The provision of a short summary on the special character of each ACA in the Appendix of the Plan will be considered.

Heritage-Led Regeneration

Current national policy requires that government, local authorities, businesses and communities place the re-vitalisation and re-use of existing town centres at the core of decision making, known as the Town Centre First Approach. Heritage-led regeneration will be key to achieving this Town Centre First Approach and the Draft Plan will include policy and objectives that actively support this throughout the document. The Council has already developed projects that concentrate on this type of regeneration. Our Balbriggan Rejuvenation Plan is an example of this approach with its focus on transforming the Main Street and the historic harbour.

Consultation with the local community was an integral part of this plan. Swords Cultural Quarter is also centred on heritage-led regeneration to re-invigorate the historic centre of Swords. The Council has created its own conservation grant scheme known as the "Stitch in Time Grant" to encourage and support owners of protected historic properties to carry out routine maintenance and small repairs. The Council will continue to be pro-active to encourage better maintenance and use of older buildings and to consider various schemes that would support this such as the Heritage Council's Historic Towns Initiatives or Irish Architecture Foundation's Re-imagine Projects. Exemptions and reductions already exist under Fingal's Development Contributions Scheme for works to Protected Structures.

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The site-specific requests for the redevelopment of heritage properties in Council ownership will be examined and considered. Some projects are already underway or about to commence such as the opening of Shackleton's Gardens or the repair of the Guinness Bridge. Others such as Ashtown Mill are in private ownership and so need the engagement of the building owner but are also subject to the uses permitted within the current land zoning.

The current Plan contains policies and objectives in relation to historic street furniture which includes water pumps. These will be reviewed and altered if necessary. The Council currently has an existing policy for thatched buildings. The Council will utilise the forthcoming National Built Vernacular Strategy to strengthen and inform its own policy on historic thatched buildings.

Funding Schemes

The provision of funding schemes is not within the remit of the Development Plan but operate independently of it. There are different funding streams available to support architectural conservation that cover small, medium and large-scale projects. Two of these are national schemes and one was created by the Council from its own resources. The Architectural Conservation Officer actively engages with owners to inform them of funding streams (and of schemes operated by other agencies) as well as publishing notices in local newspapers, draft press releases and places information on the Fingal website. The Stitch in Time Grant is open to owners and to occupiers who have the owner's permission to carry out the proposed works. Therefore, local and community groups that occupy a protected structure, building of merit in an ACA or a historic building can apply for the scheme.

Heritage Demesnes

A number of the large historic demesnes within Fingal have already been designated Architectural Conservation Areas (ACAs) in the past to acknowledge the significance of the surviving designed landscape. Direction is given in the current Plan for proposed development within ACAs and there is a requirement for Designed Landscape Appraisals to accompany development proposals for historic demesnes/designed landscapes. The existing objectives on designed landscapes will be reviewed in light of current development pressures and considerations and augmented where needed.

Climate Change:

Fingal County Council is the first local authority in Ireland to undertake a risk assessment of the effect on climate change hazards on its heritage assets. The results of this risk assessment will act as a robust baseline for the prioritisation of mitigating actions. The Council will consider the inclusion of objectives in relation to climate change adaptation to ensure climate change measures are not detrimental to heritage assets.

Cultural Heritage

The Council is committed to the promotion of the Irish language in Fingal. The Council's fourth Irish Language scheme commenced in May 2021 and shall remain in force for the next 3 years. The current Plan contains a number of objectives in regard to the use of the Irish language in naming residential and mixed schemes, the bilingual use of townland names, and the use of Irish language on shopfronts. The current policies and objectives will be reviewed and augmented if required in light of the submissions.

Since the adoption of the current Plan the government has established Creative Ireland with the aim to increase access to cultural and creative activity in each county in the country. Arising from this, Fingal has

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formed a Creative and Culture Team so that there is collaboration and support across the Council for innovation and good design as well as culture, heritage and the arts. The Draft Plan will examine the integration of creativity throughout all sections of the plan and review the approach to current Cultural Heritage policies and objectives in relation to submissions received.

Heritage Tourism/Signage

The need to promote and develop the tourism of Fingal's heritage has previously been identified and acknowledged in the current Plan; the Heritage Plan 2018-2023 and the Fingal Tourism Strategy. The Council has developed Heritage Signage & Trails Guidance which encourages a holistic approach to interpretation through the use of heritage audits and interpretation plans. Objectives to support this strategy should be incorporated into the Draft Plan. Any tourism development of Fingal's heritage should be carefully considered and carried out in a sensitive and sympathetic manner so that it does not negatively impact on the heritage asset.

World Heritage Objective:

The Council will assess the nominated sites to see if they meet the requirements for inscription on the list.

Liaison with Local Authorities

The Council will have regard to the Meath Development Plan 2021-2027 and the development plans of all adjoining planning authorities and liaise with Meath County Council and others on issues of mutual interest to ensure a co-ordinated policy approach. In making the Draft Plan, the Council shall consider any likely effects the implementation of the plan may have on the area of any adjoining planning authority.

CHIEF EXECUTIVE'S RECOMMENDATIONS

- Support the promotion, protection and perseverance of the county's the unique cultural heritage.
- Recognise the importance of our archaeological resource and provide appropriate policies to ensure its appropriate retention and recording.
- Ensure the inclusion of objectives in relation to climate change adaptation through relevant chapters/sections of the Draft Plan, to ensure climate change measures are not detrimental to heritage assets.
- Incorporate heritage features into infrastructure design at an early stage in the development planning and management process to protect and promote the cultural heritage resource and create awareness and interpretation.
- Continue to support and encourage the sympathetic and appropriate reuse, rehabilitation and retention of protected structures and historic buildings ensuring the special interest, character and setting of the building is preserved
- Promote the tourism potential of Fingal's cultural heritage and improve legibility by providing guidance for appropriate signage and interpretation in line with the Heritage Signage & Trails Guidance[

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- Ensure that the concept of sustainable development focused on the sensitive, appropriate and well-designed re-development and re-use of existing building stock of Fingal is interwoven through all chapters/sections of the Draft Plan. That the structure of each chapter addresses re-use first before giving direction for new build.
- Review and augment where appropriate the Council's policy and objectives for the protection of the historic demesnes/designed landscapes of the County, historic street furniture and historic thatched buildings.
- Incorporate a review of the Record of Protected Structures into the preparation of the new Development Plan and examine potential new Architectural Conservation Areas.
- Recognise the importance of the Irish language resource by highlighting the profile of the Irish language and ensuring that the naming of mixed residential and mixed-use schemes reflects local history, folklore and/or place names and are stated in the Irish language.

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THEME 6: GREEN INFRASTRUCTURE AND NATURAL HERITAGE

Submissions Received:

FIN-C377-7, FIN-C377-8, FIN-C377-10, FIN-C377-13, FIN-C377-15, FIN-C377-21, FIN-C377-31, FIN-C377-32, FIN-C377-36, FIN-C377-38, FIN-C377-43, FIN-C377-53, FIN-C377-59, FIN-C377-60, FIN-C377-61, FIN-C377-65, FIN-C377-67, FIN-C377-69, FIN-C377-70, FIN-C377-71, FIN-C377-75, FIN-C377-78, FIN-C377-82, FIN-C377-87, FIN-C377-88, FIN-C377-92, FIN-C377-95, FIN-C377-97, FIN-C377-104, FIN-C377-105, FIN-C377-106, FIN-C377-107, FIN-C377-109, FIN-C377-110, FIN-C377-111, FIN-C377-114, FIN-C377-115, FIN-C377-117, FIN-C377-118, FIN-C377-119, FIN-C377-121, FIN-C377-129, FIN-C377-131, FIN-C377-132, FIN-C377-135, FIN-C377-144, FIN-C377-146, FIN-C377-148, FIN-C377-150, FIN-C377-151, FIN-C377-154, FIN-C377-156, FIN-C377-159, FIN-C377-160, FIN-C377-162, FIN-C377-167, FIN-C377-168, FIN-C377-170, FIN-C377-179, FIN-C377-180, FIN-C377-181, FIN-C377-185, FIN-C377-196, FIN-C377-206, FIN-C377-209, FIN-C377-210, FIN-C377-212, FIN-C377-215, FIN-C377-217, FIN-C377-225, FIN-C377-228, FIN-C377-231, FIN-C377-233, FIN-C377-234, FIN-C377-237, FIN-C377-241, FIN-C377-249, FIN-C377-256, FIN-C377-260, FIN-C377-263, FIN-C377-265, FIN-C377-267, FIN-C377-269, FIN-C377-271, FIN-C377-273, FIN-C377-275, FIN-C377-276, FIN-C377-279, FIN-C377-281, FIN-C377-286, FIN-C377-289, FIN-C377-292, FIN-C377-293, FIN-C377-294, FIN-C377-295, FIN-C377-296, FIN-C377-297, FIN-C377-300, FIN-C377-301, FIN-C377-305, FIN-C377-310, FIN-C377-313, FIN-C377-314, FIN-C377-321, FIN-C377-325, FIN-C377-326, FIN-C377-328, FIN-C377-329, FIN-C377-330, FIN-C377-331, FIN-C377-333, FIN-C377-344, FIN-C377-345, FIN-C377-346, FIN-C377-347, FIN-C377-354, FIN-C377-357, FIN-C377-358, FIN-C377-359, FIN-C377-361, FIN-C377-362, FIN-C377-364, FIN-C377-368, FIN-C377-370, FIN-C377-372, FIN-C377-376, FIN-C377-379, FIN-C377-382, FIN-C377-386, FIN-C377-388, FIN-C377-389, FIN-C377-390, FIN-C377-392, FIN-C377-400, FIN-C377-401, FIN-C377-403, FIN-C377-406, FIN-C377-409, FIN-C377-416, FIN-C377-417, FIN-C377-418, FIN-C377-420, FIN-C377-422, FIN-C377-425, FIN-C377-428, FIN-C377-431, FIN-C377-434, FIN-C377-438, FIN-C377-447, FIN-C377-449, FIN-C377-450, FIN-C377-451, FIN-C377-455, FIN-C377-456, FIN-C377-458, FIN-C377-463, FIN-C377-465, FIN-C377-469, FIN-C377-472, FIN-C377-474, FIN-C377-475, FIN-C377-476, FIN-C377-477, FIN-C377-479, FIN-C377-480, FIN-C377-481, FIN-C377-482, FIN-C377-483, FIN-C377-485, FIN-C377-486, FIN-C377-487, FIN-C377-488, FIN-C377-490, FIN-C377-491, FIN-C377-493, FIN-C377-494, FIN-C377-495, FIN-C377-498, FIN-C377-499, FIN-C377-500, FIN-C377-501, FIN-C377-502, FIN-C377-505, FIN-C377-506, FIN-C377-507, FIN-C377-508, FIN-C377-521, FIN-C377-522, FIN-C377-526, FIN-C377-527, FIN-C377-536, FIN-C377-540, FIN-C377-542, FIN-C377-548, FIN-C377-550

SUMMARY OF ISSUES

Green Infrastructure

A detailed submission from the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media highlighted the incorporation of Green Infrastructure (GI) in spatial planning as one of the ways to address the main drivers of biodiversity loss in Ireland. The Department strongly supports a strategic approach to nature conservation in the Ecological Network. Achieving green infrastructure such as parks, urban woodlands and greenways deliver multiple benefits to the individual and the entire community. Planning for future-proofed development needs to prioritise communities that are incorporated into green infrastructure.

It is suggested that by constructing green corridors, which can also incorporate SuDs, between parks to connect with natural wildlife corridors will heighten the appreciation of the benefits of nature. There should be a focus on climate action and green infrastructure and an objective to achieve a net gain in green infrastructure in each area of Fingal through protection of existing parks and open spaces and provision of new green infrastructure as an essential part of any new development.

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Greenways

There were numerous submissions on Greenways which are an important component of GI and for these to be connected to the Fingal Coastal Way to heritage assets such as Ardgillan Regional Park, Royal Canal, Newbridge House Demesne, to towns and villages such as Lusk and Clonsilla and to be accessible as a network across the County. The Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media's submission recommended that such proposals are subject to route/site selection processes to ensure that impacts to biodiversity and nature conservation interests are avoided and noted the need to apply the precautionary principle when screening for Appropriate Assessment (AA) and/or undertaking AA for greenways.

Waterways

There were numerous submissions on the preservation and protection of the Royal Canal and others on the development of it as an amenity including a request to complete the Royal Canal Greenway; to engage with local communities and to provide specific objectives relating to Clonsilla in the context of the future development of the Royal Canal as an amenity having regard to the sensitive environmental and heritage nature of the canal.

A submission requested that the Council complete the Santry River Greenway as a matter of urgency and develop other riverside amenities as a preferred option was received.

Watercourses

A number of submissions were received requesting the protection of watercourses from degradation and inappropriate development and the adoption of a regional approach for the protection of watercourses in co-operation with neighbouring counties; Specific measures to discourage culverting of water courses, encourage the reopening and to promote the removal of historic infilling along watercourses were requested.

Riparian buffers

There were multiple requests to define the extent of riparian buffers. The IWAI would propose a minimum buffer zone of 50 metres while other suggestions were for a suitable buffer zone of at least 30m similar to other waterways in Dublin and up to 200m riparian corridor adjoining the Royal Canal

There was also a submission requesting a more flexible and case-specific means of assessing what constitutes an appropriate riparian corridor width.

Biodiversity

A very lengthy and detailed submission was received from the Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media. The Department strongly supports the strategic approach to nature conservation in Fingal and requests the Council incorporate the 14 key points from the Biodiversity Strategy into the Draft Plan. The importance of setting out legislative requirements in relation to the protection of designated sites and protected species under both European (EU Birds Directive (2009/147/EC) and Habitats Directive (92/43/EEC)) and national legislation (i.e. Wildlife Act 197-2018) is noted. It is also imperative that environmental assessments (Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA)) in relation to the Draft Plan are integrated with the plan-making process and that the precautionary principal is applied to ensure there is no deterioration of habitats or declines of species of conservation significance. The submission requests a new objective for pollinator corridors, areas for rewilding (e.g. greenbelts) and to prepare management plans for these spaces in order to prevent further carbon loss from drought/damage / anthropogenic impacts.

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One submission expressed support for the principle of no biodiversity loss and recognised that a mechanism needs to be developed in the Draft Plan to implement the principle. A 'greening' strategy should be implemented for the Fingal Region to improve its appearance, function and biodiversity.

Multiple submissions were concerned with invasive species as they have been, and to some extent still are, a significant problem in the County. Areas of work are noted, and it is recommended that such control of alien invasive plant species should be continued.

Biodiversity Awareness

There were numerous submissions to increase awareness and outreach in regard to biodiversity; to develop and implement local Biodiversity Plans in association with community groups and to increase collaboration between the Council and local communities to maximise biodiversity potential in towns and villages. Requests were received for the provision of information points throughout Fingal allowing people to learn about biodiversity and what animals, plants and insects they may see.

Multiple submissions requested provision of baseline metrics for biodiversity across Fingal; for specific areas of Fingal to be identified for their biodiversity and ecological value and audits of all planting in parks and green spaces in the control of the Council.

Biodiversity & New Developments

Multiple submissions received requested that biodiversity considerations are integrated into all sections of the Draft Plan and are taken into account when considering lands for development; that all new development in Fingal should be required to incorporate green infrastructure, nature-based solutions, planting and landscaping into its design and to ensure that biodiversity is considered as a key factor in all future planning decisions. The Council is requested to encourage the inclusion of SuDs features which contribute to biodiversity in schemes and that development in the vicinity of the existing Special Areas of Conservation (SAC) should be carefully managed to prevent disruption to the designated species that may use the areas.

Biodiversity Designations

A submission requested that recognition of biodiversity is not just contained within specifically designated areas. There was a call for a Council commitment to reject proposals that would interfere with natural floodplains and to designate Special Areas of Conservation (SAC) or Special Protection Area (SPA). Submissions referred to an urgent need to prepare holistic management plans for the European Sites that adjoin Malahide; Biodiversity conservation in urban areas; to protect the Liffey Valley SAAO and to prioritise the Appropriate Assessment (AA) of proposed Natural Heritage Areas, particularly the Royal Canal which is rich in biodiversity. Requests were made to retain the Special Amenity Area Order in areas of Dublin 15 and the lands they are attached to as green banks, such as Strawberry Beds, Luttrellstown Castle Demesne and high amenity lands in the Westmanstown area. Multiple other site-specific requests were made, for example, the use of Ballast Pit, Skerries as a nature reserve; amending the ecological buffer zone in and around Caves Marsh and provide for a habitat for birds and a study of flora and fauna in St Margaret's.

Multiple submissions were made to maintain the Howth SAAO and to retain the High Amenity zoning of the lands of Howth Estate and the East Mountain and to highlight the importance of Howth as an environmental and biological area for many species of wildlife, birds, animals, flora, and fauna.

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Trees & Hedgerows

There was extensive support for tree planting, retention and protection of trees. Promotion of the planting and protection of native Irish trees was requested including a request for 1000 no. native trees in each electoral area and to aim for 15% tree cover by 2030. Requests for tree planting/improvement of tree cover at Balbriggan, Balrothery, Castleknock village, Meakstown, Rush and Lusk were made along with a request for replacement of trees in urban villages removed on safety grounds. Submissions requested a clear consultation process for any removal or planting of trees.

There was also extensive support for the retention and protection of hedgerows and recognition of the importance of hedgerows as habitats for wildlife and native species. Requests were submitted for the protection of existing hedgerows in Donabate, Portrane, Rush, Lusk, Ballyboughal, Naul, Oldtown and Garristown; the reduction of hedgerow cutting to every two years and for engagement with the NPWS to ensure better enforcement of measures to prevent cutting and burning of hedgerows and woodland outside of the designated period under the Heritage Act.

Mapping of woodlands and hedgerows was requested in multiple submissions as was public consultation for new areas of planting. The need to identify country lanes where hedgerows must be protected as nature corridors for biodiversity was highlighted and a request that the planned re-survey of all street trees (including hedgerows) should take place without delay and to ensure Tree Protection Orders are put in place, particularly for ancient and veteran trees. It was suggested that the Council should explore and implement a new strategy on how developers should increase the volume of tree canopy cover and areas of biodiversity within their housing schemes.

Coastal Protection & Amenity

Multiple submission were concerned with the effects of coastal erosion and solutions suggested including no more new buildings within a ½ mile of the coast; use of locally sourced stone to form screeds and protection; Fingal County Council to plant more trees and shrubs which absorb water; coastal management in association with coastal communities should focus on nature-based measures; armour should be erected to protect our coastlines and the land beyond them. Additional public consultation and engagement with a particular focus on effected residents should be facilitated by an enhanced Coastal Liaison Group. Targeted supports were requested in relation to coastal erosion for Portrane and Rush and for the Broadmeadow estuary at Corballis, Donabate.

There were also multiple submissions for the development of the coast as an amenity with requests for importance of ports, jetties, quays and piers to the local economy as well as their role as recreational and amenity facilities to be recognised and addition facilities (carparking, toilets, access) including numerous requests for infrastructure (platforms, tidal pools) to facilitate sea swimming and assessing the feasibility of a marina in Rush.

There were a number of policy suggestions including that Fingal should take the lead nationally in terms of developing a Managed Retreat policy and to establish, a coastal monitoring programme to provide information on coastal erosion on an ongoing basis. The Office of Public Works (OPW) requested that there is regard to areas that may be at risk or vulnerable to coastal erosion or coastal change, including impacts associated with climate change. The Geological Survey of Ireland noted that geo-hazards such as landslides, flooding and coastal erosion can cause widespread damage to landscapes, wildlife, human property and human life and need to be taken into consideration, especially when developing areas where these risks are prevalent.

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Landscape

A submission from Meath County Council requested that the Landscape Character Assessment document and the list of Protected Views and Prospects, contained in the Draft Meath County Development Plan 2021-2027 be reviewed in developing policies and objectives that may have an impact beyond the Fingal Administrative Boundary and into County Meath.

Submissions were made for protected views around Darcystown; the eastern seaboard and the Mourne Mountains; from Muck Rock overlooking Howth Castle and from the upper end of Dunbo Hill to Howth Harbour.

Webinar 2: Heritage and Green Infrastructure

The review of the Record of Protected Structures was highlighted as were streetscapes and Architectural Conservation Areas. Protection of heritage, historical demesnes and trees is required. The reduction of mowing regimes for green areas was requested. Interpretation of heritage for a tourist audience was highlighted. Measures for coastal management and protected were also highlighted.

The issues raised in the Heritage and Green Infrastructure Webinar have been dealt with throughout the report.

CHIEF EXECUTIVE'S RESPONSE

Green Infrastructure

The wide range of benefits are delivered to the citizens through GI including the integration of walking, cycling and recreation, flood prevention, filtration of pollutants, erosion prevention and CO2 storage have previously been identified and acknowledged in the policies and objectives of the current Plan will be reviewed and augmented if appropriate in light of the submissions.

Greenways

The Council recognises the value of strategic greenway development in increasing connectivity between towns recreational amenities, cultural and natural heritage assets. However, development of Greenways in natural settings can have a detrimental impact on the ecological value of the area. Many of the impacts can be avoided by sufficiently rating/valuing ecology when carrying out route option assessments and by seeking early input from an ecologist in the design team. It is proposed to include an objective in the Draft Plan that will ensure no net biodiversity loss as a result of Greenway developments in the County.

Waterways

The Council is currently undertaking the second stage of public consultation for the proposed Royal Urban Greenway which will have regard to existing environmental context of the canal corridor. The Royal Canal is recognized in the current Plan as a valuable natural amenity corridor. It is envisaged that the existing objectives for the Royal Canal will be included in the Draft Plan.

The Council will coordinate with the work being planned by Dublin City Council in relation to the Santry River Greenway.

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Watercourses

The maintenance and improvement of the environmental and ecological quality of Fingal's watercourses and coastal waters pursuant to the requirements of the Water Framework Directive are acknowledged in the current Plan and it is envisaged that the current policies and objectives will be incorporated into the Draft Plan.

Riparian buffers

The Council will be reviewing the width of the buffer zones along watercourses to ensure that they will function as an effective corridor for both aquatic and terrestrial flora and fauna. The Draft Plan will reflect the findings of the review.

Biodiversity

The Draft Plan will set out legislative requirements in relation to the protection of designated sites and protected species under both European and national legislation. The targets set out in the EU biodiversity plan will also inform the new Fingal Biodiversity Action Plan.

The principle of no net biodiversity loss as set out in the National Biodiversity plan will be explored in the Draft Plan although it should be noted that there are currently no national guidelines available on how to implement that in practice. The development of Urban Greening plans for cities with at least 20,000 inhabitants will also be considered in the Draft Plan. Rewilding initiatives will be explored in the new Biodiversity Action Plan.

Invasive species control programmes are underway and will continue until these species are eradicated or at least under control. Current policy and objectives for invasive species management will be included in the Draft Plan.

Biodiversity Awareness

The Fingal Biodiversity Action Plan which is currently under preparation will include outreach and education initiatives. A project is already underway to develop biodiversity plans for all Tidy Towns groups in Fingal, which will help to raise awareness and get the local community directly involved in nature conservation initiatives.

Areas of biodiversity interest have been mapped and have been incorporated in the green infrastructure network maps. These maps will be included again in the Draft Plan.

Biodiversity & New Developments

The current Plan and the Biodiversity Action Plan set out the limitations and requirements for development within the Green Infrastructure network. Developments in the vicinity of SACs are subject to Appropriate Assessment (AA) screening and where required, a Natura Impact Statement to ensure that new development does not have a detrimental impact on nearby designated sites.

Biodiversity Designations

The Council is not responsible for the designation of sites as Natural Heritage Areas (NHA), Special Areas of Conservation (SAC) or Special Protection Areas (SPA). The National Parks and Wildlife Service is responsible for designating sites under the Wildlife Act, Habitats Directive and/or Birds Directive and preparing management plans for these sites.

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Developments in the vicinity of SACs and SPAs are subject to AA screening and where required, a Natura Impact Statement to ensure that new development does not have a detrimental impact on nearby designated sites. NHAs are not subject to Appropriate Assessment as this assessment is linked to the EU Habitats and Birds Directives, while the NHA designation is linked to the Irish Wildlife Act. The current Plan contains several objectives regarding the protection of designated sites, SAAOs and the green infrastructure network including floodplains, and it is envisaged that these objectives will be included in the Draft Plan.

The proposed individual site conservation measures will be considered in the context of the Biodiversity Action Plan which is currently under preparation. Howth is a major tourist attraction and the role of the SAAO in protecting this nature amenity resource is acknowledged in the current Plan. which contains several objectives regarding the protection of the Howth SAAO and the Howth Head SAC. It is envisaged that these objectives will be retained and included in the Draft Plan.

Trees & Hedgerows

Submission relating to tree planting are addressed in the objectives and actions outlined in the Forest of Fingal Tree Strategy and in the upcoming Biodiversity Action Plan.

The importance of hedgerows as a habitat and wildlife corridor is acknowledged in the current Plan and it is proposed to retain the existing objectives to protect hedgerows in the Draft Plan. The Council will also be working with Tidy Towns groups and local community groups to carry out active management on retained hedgerows in urban settings as part of the implementation of the Fingal Biodiversity Action Plan.

Re-surveying of street trees is addressed in the objectives and actions outlined in the Forest of Fingal Tree Strategy. Mapping hedgerows and identifying the high value hedgerows will be one of the actions in the Fingal Biodiversity Action Plan. Local Authority related objectives of the National Pollinator Plan as revised are to be included in the Draft Plan.

Coastal Protection & Amenity

The current Plan acknowledges the dynamic nature of the coastline and sets out a range of policies and objectives on how coastal change is to be managed. It is envisaged that these current policies and objectives will be incorporated in the Draft Plan.

The Fingal Coastline is an important amenity resource. Any new amenity developments along the coast have to be carefully sited to ensure that they do not impact on coastal habitats and their associated wildlife or impact on or be affected by Coastal Change.

The OPW has set up a five year pilot program for monitoring coastal change at Portrane and Rush. When the best methodology for surveying, processing the data and presenting the findings has been established by this pilot project, the Council will be able to roll this out across the County in line with best practice as advised by the OPW.

Landscape

The Council will have regard to the Meath Development Plan 2021-2027 and the development plans of all adjoining planning authorities and will liaise with Meath County Council and others on issues of mutual interest

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to ensure a co-ordinated policy approach. In making the Draft Plan, Fingal shall consider any likely effects the implementation of the Plan may have on the area of any adjoining planning authority.

A process of review and assessment of Protected views will form part of the Draft Plan process.

CHIEF EXECUTIVE'S RECOMMENDATIONS

- Promote an awareness of the benefits of Resilient Design and the multi-functional nature of Green Infrastructure. Apply principles of Green Infrastructure to inform the development management process in terms of design and layout of new residential areas, business/industrial development and other significant projects while maximizing the multi-functional nature of Green Infrastructure by ensuring the development of synergies between Public Open Space, Biodiversity, SuDS/Water Sensitive Design and Active Travel objectives.
- Support the Draft 'Forest of Fingal – Fingal Tree Strategy', the 'Keeping it Green – Fingal Open Space Strategy' and the Draft 'Space for Play- Fingal Play Policy' in the Draft Plan.
- Continue to support Fingal's Allotment Strategy, Community Gardens and promote re-wilding and pollinator initiatives within the County.
- Support policies within the Draft Development Plan to enhance and promote access to the coast, including the promotion of coastal recreational facilities where appropriate.
- Promote the provision of wildflower meadows.
- Protect and enhance ecological diversity and the natural environment within the County.
- Support the development of the Fingal Ecological Network in line with the Fingal Biodiversity Action Plan.
- Continue to support the Fingal Invasive Species Action Plan.
- Promote rewilding and pollinator initiatives in Fingal.
- Promote biodiversity gain in new developments.
- Support the development of the Fingal Ecological Network in line with the Fingal Biodiversity Action Plan.
- Recognise and promote the diverse and key roles that parks, and open spaces have for placemaking and the development of Healthy & Sustainable Communities.
- Continue to support the "Keeping It Green – Fingal County Council Open Space Strategy" and future versions of the Strategy.
- Provide for appropriate protection of trees and hedgerows, recognising their value to our natural heritage, biodiversity and climate action and encourage tree planting in appropriate locations.

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- Ensure the County's natural coastal defences, such as beaches, sand dunes, salt marshes and estuary lands, are protected and are not compromised by inappropriate works or development.
- Consider including greater policy guidance on coastal zone management subject to forthcoming national guidance.
- Support the protection and promotion of Dublin Bay Biosphere, in particular as it relates to Fingal.
- Actively preserve and promote the landscape, natural life, economy and lifestyles of rural Fingal, protecting the area from inappropriate development and land uses.

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THEME 7: INFRASTRUCTURE AND UTILITIES

Submissions Received:

FIN-C377-3, FIN-C377-7, FIN-C377-31, FIN-C377-32, FIN-C377-48, FIN-C377-50, FIN-C377-59, FIN-C377-61, FIN-C377-63, FIN-C377-67, FIN-C377-69, FIN-C377-72, FIN-C377-87, FIN-C377-92, FIN-C377-97, FIN-C377-101, FIN-C377-105, FIN-C377-106, FIN-C377-109, FIN-C377-110, FIN-C377-111, FIN-C377-112, FIN-C377-115, FIN-C377-118, FIN-C377-119, FIN-C377-129, FIN-C377-132, FIN-C377-136, FIN-C377-140, FIN-C377-141, FIN-C377-145, FIN-C377-146, FIN-C377-147, FIN-C377-148, FIN-C377-150, FIN-C377-151, FIN-C377-152, FIN-C377-154, FIN-C377-159, FIN-C377-160, FIN-C377-165, FIN-C377-166, FIN-C377-167, FIN-C377-169, FIN-C377-170, FIN-C377-171, FIN-C377-173, FIN-C377-177, FIN-C377-181, FIN-C377-185, FIN-C377-193, FIN-C377-195, FIN-C377-199, FIN-C377-209, FIN-C377-210, FIN-C377-216, FIN-C377-218, FIN-C377-225, FIN-C377-228, FIN-C377-229, FIN-C377-231, FIN-C377-233, FIN-C377-237, FIN-C377-239, FIN-C377-243, FIN-C377-253, FIN-C377-256, FIN-C377-257, FIN-C377-263, FIN-C377-269, FIN-C377-274, FIN-C377-275, FIN-C377-280, FIN-C377-287, FIN-C377-301, FIN-C377-305, FIN-C377-309, FIN-C377-312, FIN-C377-314, FIN-C377-318, FIN-C377-323, FIN-C377-325, FIN-C377-329, FIN-C377-330, FIN-C377-331, FIN-C377-333, FIN-C377-337, FIN-C377-345, FIN-C377-347, FIN-C377-352, FIN-C377-357, FIN-C377-359, FIN-C377-361, FIN-C377-369, FIN-C377-370, FIN-C377-372, FIN-C377-376, FIN-C377-377, FIN-C377-385, FIN-C377-388, FIN-C377-389, FIN-C377-391, FIN-C377-394, FIN-C377-396, FIN-C377-399, FIN-C377-402, FIN-C377-409, FIN-C377-416, FIN-C377-417, FIN-C377-418, FIN-C377-420, FIN-C377-422, FIN-C377-425, FIN-C377-431, FIN-C377-434, FIN-C377-445, FIN-C377-449, FIN-C377-450, FIN-C377-455, FIN-C377-458, FIN-C377-463, FIN-C377-469, FIN-C377-473, FIN-C377-474, FIN-C377-475, FIN-C377-476, FIN-C377-479, FIN-C377-481, FIN-C377-482, FIN-C377-485, FIN-C377-487, FIN-C377-489, FIN-C377-491, FIN-C377-494, FIN-C377-495, FIN-C377-496, FIN-C377-498, FIN-C377-502, FIN-C377-505, FIN-C377-506, FIN-C377-507, FIN-C377-508, FIN-C377-522, FIN-C377-527, FIN-C377-529, FIN-C377-536, FIN-C377-539, FIN-C377-542, FIN-C377-548, FIN-C377-550.

SUMMARY OF ISSUES

WATER AND WASTEWATER INFRASTRUCTURE

Wastewater Infrastructure

The need to promote and provide high quality physical infrastructure was noted in a number of submissions, with a requirement that Fingal County Council (FCC) continue to work closely with Irish Water (IW) and all of our utility providers to ensure a timely delivery of sufficient water infrastructure. We need to invest and upgrade our current water network to improve resilience and reduce water loss. The Council should continue to engage with IW to ensure any capacity issues in the County are identified and addressed as a matter of urgency.

The submission from IW notes the NPF and RSES objectives related to water services provision and Section 10.2 of the RSES is specifically highlighted in this regard, which provides general policy direction in relation to the sustainable management of water supply and wastewater needs. The submission sets out the various national plans and programmes by IW which will develop solutions to overcome current constraints and which are of relevance to FCC in preparing the Draft Plan and in formulating policy and objectives relating to water and wastewater, which include:

- Irish Water Investment Plan (Revenue Control Period 3) 2020 to 2024.
- National Water Resources Plan.
- The Water Supply Project.
- Ringsend Wastewater Treatment Works.

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- Greater Dublin Drainage Scheme.
- Wastewater Treatment Capacity in other Areas.
- Wastewater Networks, Sustainable Urban Drainage and Blue/Green Infrastructure.
- Drainage Area Plans.
- Climate Change.
- River Basin Management Plan.

A suite of recommended text/policies/objectives are included in support of the IW submission for inclusion in the Draft Plan relating to the protection of Irish Water assets and the environment for the benefit of current and future residents served by public water services networks.

A number of submissions raised concern with regard to wastewater and treatment plant capacity for Fingal. Fingal's coast, beaches and rivers face frequent pollution due to the inadequacy of the sewer network including the pumping stations, and the misconnections which direct surface water into the sewers causing them to overflow.

The submission from Dublin Chamber highlights that the maintenance of water and air quality and sustainable water management should be an infrastructural priority in the new Development Plan and FCC should proactively collaborate with IW to progress and deliver vital infrastructure projects. An overriding objective for infrastructure provision under the new Plan should be to focus on sustainable infrastructure which supports an improved environment and reduced emissions.

Some submissions received highlighted potential infrastructure constraints within the IW network and referenced proposed developments which have been delayed for over 2 years. It was noted that these infrastructure deficits can delay the delivery of much needed housing. Delays to supporting infrastructure, such as the Water Supply Project for the Eastern Midland Region, must be avoided, so that housing and other key projects in Dublin and other urban centres can progress without delay.

Other submissions requests that reference to infrastructural investments (wastewater upgrades) are specifically referenced in the Draft Development Plan, while a number of submissions noted the need to ensure that there is sufficient wastewater treatment capacity to serve the needs of the growing population.

One submission also noted the need for provision of a robust monitoring system of the wastewater pumping infrastructure with outages at pumping stations made available on Fingal County Council's and Irish Water websites.

The problem of sewer pipes being misconnected and discharging to surface water was flagged in observations received and it was noted that the Plan should commit to addressing all sources of sewage causing water pollution in the County.

Submissions received highlighted the need for improved infrastructure for water and wastewater treatment in a number of locations which are currently experiencing problems, including Naul, Oldtown, Balcarrick, Corballis, New Road and Hearse Road, (Donabate), Racecourse Commons and Baleally Lane, (Lusk), North Beach, Channel Road, Rogerstown and Sundrive Rd., (Rush), Howth and Hollystown.

The submission from Inland Fisheries Ireland (IFI) notes that sufficient treatment capacity must be available both within the receiving sewerage systems locally and downstream of waste water treatment plants over the full duration of the Plan in order to protect the ecological integrity of the receiving waters. This submission requests that in areas where treatment facilities necessary for development do not exist, planning permissions

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should either be refused on the grounds that such development is premature, or the developer should be constrained by an appropriate condition requiring that connections to sewer will not be permitted until sewage works upgrading is completed and operational. It is important that the Fisheries Service is involved at as early a stage as possible in any project involving a watercourse.

It is also noted that it is imperative that Fingal County Council maintain an abstraction register and that water storage facilities are required on these intensive holdings.

The submission from An Taisce highlights that Ireland faces an immense challenge in achieving 'good' status in all water bodies by 2027 as required by the Water Framework Directive (WFD). An Taisce's submission highlights a recent court ruling (Justice Hyland – 2018 740 JR) which clarifies how unassigned water bodies must be treated when assessing planning applications against WFD requirements, with implications for projects in proximity to unassigned waterbodies. This should be reflected in the new Development Plan.

After agriculture, wastewater discharges to water from human settlements, including towns, villages and rural houses, is generally the biggest source of water pollution through discharges of phosphorus, nitrogen, ammonium, pathogens, etc.

The submission from An Taisce made reference to the 'Implementation Review Country Report' issued by the European Commission, which highlighted Ireland's position stating there are substantial implementation issues here when it comes to the Urban Waste Water Treatment Directive (EC, 2017). An Taisce's submission made a number of recommendations for inclusion of policies within the Draft Plan related to the Water Framework Directive; River Basin Management Plans; legal obligations under the Waste Water Discharge (Authorisation) Regulations; development management recommendations related to serviced sites, private wastewater treatment proposals and the use of SuDS. An Taisce also recommended that the Development Plan down-zone lands categorized in 'Flood Zone A' or 'Flood Zone B'.

One submission requests that no references are made to the Greater Dublin Drainage Project (GDDP) in the next Development Plan.

Water Supply & Water Quality

The Dublin region has a major fresh water supply issue. Extra water sources are needed and the need to improve drinking water quality arose in many submissions received. It was noted in submissions that the Greater Dublin Area currently operates its drink water capacity with only 2% additional headroom, with Poolbeg Waste Water Treatment Plant (WWTP) also operating at or above capacity. Concern was raised in a number of submissions regarding the availability of mains water supply and concern regarding water pressure. One submission requested that a water usage audit of public buildings should be carried out and water conservation measures implemented.

The danger of microplastics in ground water was noted in other submissions received. It is suggested that Fingal County Council could be a leader in this regard and work with IW to remove these microplastics from water supply.

One submission requested the Council to acknowledge that every farmer in the County has a right to bore a well on their land and source water for their family and livestock.

In terms of groundwater, submissions flagged the need to protect the ground water quality in the County and noted that there should be a strategic aim of ensuring all waste water treatment plants can operate effectively with their current and future demand.

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The submission from the Geological Survey of Ireland (GSI) recommends that the Draft Plan considers the impacts of protecting our natural groundwater resources on human health, biodiversity, the environment and the economy. GSI groundwater protection maps should be considered in the context of preparing the Draft Plan for protecting our natural ground water and should include Groundwater Protection Scheme information. GSI also highlighted several of their programme datasets which will be of benefit to waste treatment issues and its effects on groundwater, soils and the underlying bedrock geology.

Rivers and Coast

Water quality of local rivers needs to be improved with cleaning of local streams required. Concern regarding water quality was raised in a number of submissions with particular reference to the Brook Stream, Rush and the Devlin River, Naul.

The area to the south of Balrothery forms part of the drinking water catchment area of the Bog of the Ring drinking water facility. Submissions requested that these areas should be protected from inappropriate development that could contaminate the groundwater.

A number of submissions highlighted the importance of our coastal areas and the need for them to be protected by rigorously enforcing environmental standards for waste water, in an effort to prevent and reduce marine pollution and stop effluent discharge into the sea.

There has been a significant increase in sea swimming and this was reflected in the huge number of submissions highlighting the importance of good water quality for swimming and the need for year round water testing of coastal waters, particularly at Howth, Rush, Balbriggan, Skerries, Portmarnock, Malahide, Sutton and Donabate.

A number of submissions requested that the Council commit to a Development Plan objective of achieving excellent water quality status and Blue Flags for as many of our swimming and water sports areas as possible. The need to support the adaptation of the National Coastal Change Management report once published, was also noted.

Flood Management

Many submissions received referenced specific areas which are subject to flooding, including Palmer Road, Brook Lane and Rogerstown (Rush), Skerries Mill Stream, Strand Road, Portmarnock, Malahide, Howth, Sutton and many submissions referenced the need for a secondary culvert along Channel Road, Rush.

One submission requested that Fingal de-zone or down-zone lands categorized in 'Flood Zone A' or 'Flood Zone B' applying the sequential approach. Other submissions highlight that FCC must take a zero-tolerance approach to any proposed development on flood plains and at any coastal areas where there is a risk of flooding.

The submission from the OPW requests FCC give a clear commitment to Section 28 Guidelines on Flood Risk including the sequential/precautionary approach to managing flood risk; ensure the inclusion of strategic objectives relating to flood risk and the principles of the Guidelines in the Draft Plan and to address the following specific considerations as follows:

- Flood Risk Management Plans and Maps.
- Land Protected by Agricultural Embankments.
- Natural Water Retention Measures.

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- Climate Change Impacts.
- Coastal Management.
- Coastal Erosion and Flooding.

Sustainable Urban Drainage Systems (SuDS)

A number of submissions requested that SuDS and rainwater harvesting be mandatory for all new development proposals, with green spaces designed to include surface and storm water sumps. It is also suggested that rainwater harvesting could be installed in existing buildings and this could be incentivised. Every house in new developments should have a water butt with underground water retention tanks.

The submission from An Taisce notes that SuDS are now becoming the norm throughout Ireland and should continue to be prioritised and required by the Development Plan.. Other submissions received note that the integrated approach of widespread permeable paving, green roofs, rain gardens and swales is not being implemented in Fingal, and instead there is a tendency to simply revert to digging enormous retention ponds in the corners of development sites. This results in open space areas being unusable for informal recreation, and it fails to achieve the landscape and biodiversity objectives which a more sophisticated application of SUDS would deliver.

The Plan needs to be designed to ensure that high quality SuDS designs, reflecting best practice, are provided, rather than simply providing big holes in the ground.

A number of submissions highlighted the need for innovative urban SUDS infrastructure, with an integrated approach to surface water management which includes nature-based solutions in the entire catchment area.

A few submissions highlighted a conflict that currently exists between the provision of open space, achievement of required densities and inclusion of SUDs within proposed developments. SUDS features must be located within areas of open space (OS), however, areas incorporating SUDs features are required to be discounted from the overall OS provision. This can be challenging when seeking to achieve the required densities on a site and it fails to acknowledge the contribution that appropriately designed SUDs features can make.

The issue of appropriate buffer zones and riparian corridors arose in a number of submissions. Some submissions requested a minimum buffer zone of 50m in certain areas, while other submissions requested that Fingal County Council review Objective WQ05 of the current Plan to provide a more flexible and case-specific means of assessing what constitutes an appropriate riparian corridor width. Objectives are required that ensure that no development occurs on flood plains and historical flood risk areas.

Circular Economy, Sustainability and Water Conservation

The importance of the circular economy and sustainability was highlighted in many submissions received and the need to promote the reduction and re-use of water through the procurement and delivery of services was noted. A number of submissions requested that wastewater evacuation at household and estate levels is evaluated and that we need to encourage people to use less domestic water through a combination of education and incentives. Funding for rainwater tanks in households / retrofitting measures was also noted and the need to improve separation of rainwater and wastewater at household level and in estates was also noted.

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A number of submissions requested the provision of public drinking water facilities in towns and villages and bottle filling stations to reduce plastic bottle waste, following on from the successful rollout of 9 no. contactless Ecofil stations in 2020. The reinstatement of old water pumps for drinking water was also requested.

The importance of the installation of Green Water Systems and Grey Water is noted in several submissions with the recommendation that water recycling be included in major refurbishments, and all new building developments. Brown water systems should be designed and installed for domestic houses and commercial buildings so as to lessen the demand for pumped treated clean water for these structures.

Waste Management

Illegal dumping and litter are becoming a big issue in Fingal and this has been raised in a substantial number of submissions received. More proactive management of illegal dumping, litter and dog excrement is required. Dumping and litter management has been flagged at a number of locations in submissions received, including: Brooks End, Rush; lands between Seabury Estate, Killeen Estate and Millview, Seabury Park and Malahide Rugby Club; Balcadden; Balbriggan; Powerstown Road; Howth and Hollystown.

A number of submissions request the Installation of CCTV to tackle fly-tipping, particularly in rural areas.

One submission requests that Fingal County Council liaise directly with the Regional Waste Management Planning Office regarding development of the final plans.

The need for wider community access to waste services in the County was noted in submissions received. Facilities such as mobile brings centres, underground community bins and composting are sought, which would reduce street level clutter. One submission requested the location of civic amenity sites on the outskirts of towns and villages, and it is suggested that the Council consider establishing a network of strategically located skips on the outskirts of all towns and villages, where people can safely dispose of rubbish, rather than litter the countryside.

Circular Economy and Recycling

The need for waste management to prioritise recycling and elimination of waste in the first instance was flagged in numerous submissions received. Fingal County Council needs to further promote recycling to build on the successes of the recycling and drop centres and provide for greater penalties for littering. Specific climate action policies on reusables encouraging a circular economy should be included in the plan. The submission from Gas Networks Ireland notes that the Development Plan can facilitate Fingal's transition to a low carbon society by supporting the generation and use of renewable energy and supporting circular economy projects.

Submissions request that the Council should include deposit / refund initiatives, plastic bottle bank scheme, aluminium can recycling and other initiatives in the Development Plan. The need to promote waste segregation and recycling including segregated bins in public spaces was also highlighted in submissions received. The Council should focus on waste prevention measures in the region, including foods waste reduction incentives and set targets to halve food waste in Fingal by 2030.

One submission received seeks to establish a Circular Economy Resource Campus in Fingal.

New and additional recycling facilities (including electrical goods) are required in Fingal. Submissions request that the Council mandate the electrical industry to manufacture new appliances which are repairable, rather

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than having to be replaced when a small problem arises. The need to increase the green bin collections to once a week was also raised in a number of submissions received. Another submission suggested the creation of an Upcycling Centre, where recyclable or serviceable materials and items can be re-used by the local community.

A few submissions asked Fingal County Council to make recycling centres free for recycling and paid for refuse, with extended opening hours and improved accessibility. The new Development Plan should consider creating more smaller depots which are accessible to a larger portion of the population. Additionally, it is requested that the council should operate a collection service for heavy or bulk items and extend facilities to recycle at bring banks to include small batteries, bulbs electrical goods and cooking oil. Encourage repair outlets for bikes, clothes and anything else that is recyclable.

One submission requested more transparency in terms of Fingal County Council's current levels of recycling and requested that we publish where our recycling goes, while another submission requested that waste management needs to be brought back under the control of the Local Authorities and Fingal should be re-municipalising the waste services.

A number of submissions request that we make Fingal more sustainable by promoting beach clean-ups; have segregated bins for recycling, include a thick mesh at river mouths to prevent plastic debris; ban single use plastics, election posters, supermarket waste; provide recycle machines for plastic bottles; and enhance communications between schools and Local Authority.

Waste Reduction Education / Access

Many submissions noted the need for better education on recycling and that an educational campaign is needed to highlight sustainable food waste management options for homes and businesses. Anti-litter campaigns are needed with more education of commuters in terms of litter. Submissions recommend the inclusion of community waste prevention demonstration programmes, which provides skills to develop waste prevention within local communities.

Other submissions note that FCC should encourage, incentivise and support Tidy Towns groups, community organisations and businesses to produce less waste and to dispose of the waste they do produce in a sustainable manner. Composting facilities should be included in the gardens in new developments for uncooked household waste and towns should be developed in Fingal as 'zero waste towns' to eliminate the use of single use plastics.

Litter Management

Submissions received note appreciation for the recent input from Fingal County Council to Howth in terms of litter management. However, a large number of submissions highlighted the need for additional street bins at a number of locations throughout Fingal and the need for more bins in our parks and on our beaches was flagged a number of times.

The issue of more regular emptying of bins was also highlighted, with many bins full and overflowing with rubbish.

Animal fouling (dog, horse, etc) was also highlighted as a key issue on Fingal's streets and in our parks and on our beaches. The need for more park wardens and more litter wardens was raised with people noting that there is no enforcement and fines are not working.

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The need for public compostable bins, waste separation bins and the installation of smart bins throughout Fingal arose in many of the submissions we received.

Takeaway food packaging highlighted as the main source of litter in a number of submissions, with a request that FCC need to work with these businesses and encourage less packaging, provide incentives for reuse of containers, cups and bottles. Takeaways need to be incentivized to reduce rubbish generated, with specific requests for Fingal to ban all single use plastic from its parks i.e. from cafes, at concerts and other events.

A number of other issues were raised related to waste management including:

- Insurance needs to be provided for people to do litter picking – Tidy towns.
- The number and sheer difference in design of litter bins in Blanchardstown needs to be addressed.
- Relocate the recycling bins at Barnageeragh to avoid vehicular conflict.
- FCC have a commitment under the CAP 2019, to address Climate Change. The distribution of this booklet (Strategic Issues Info Booklet), in hard copy, to all homes in Fingal seems to be at odds to that commitment.
- FCC to ban election posters and leaflet distribution to reduce the massive amount of waste associated with these.
- Where an existing recycling facility has been permitted and in operation for a number of years, the land-use zoning should be amended to allow for such uses under its list of uses ‘permitted in principle’ or a ‘Specific Objective’ should be designated to these facilities, in order to recognise and support existing facilities that contribute to waste management objectives and ensure that these facilities are supported.
- Silting levels in Howth Harbour are a concern.

DIGITAL CONNECTIVITY

A number of submissions received related to digital connectivity and the need for Fingal County Council to implement the National Broadband Plan (NBP). With the increase in people working from home, many submissions highlighted the need for high speed broadband to increase the number of people working remotely to rejuvenate towns and villages. A number of submissions referenced the need for remote working hubs and co-working spaces in our towns and villages. Submissions requested that all future new builds should have high-spec broadband as a standard feature like other utilities such as gas and electricity.

The importance of the rapid rollout of the NBP was also emphasized in the IBEC submission, which noted the need to enhance connectivity, regional development, and inclusion in further digital opportunities. The Council must address any local obstacles to the speedy rollout of the NBP and other telecommunications infrastructure so that networks are improved, and fibre broadband delivered as rapidly as possible. The submission notes that we need to ensure a supporting regulatory environment for the successful rollout of 5G. The submission from Gas Networks Ireland (Aurora) highlights the shift towards the prioritisation of digital infrastructure as an essential infrastructure for the economic and social development of communities by the market and policy makers, especially since the start of the pandemic. This submission highlights the need to work collaboratively to identify opportunities in the digital economy and notes that the Draft Plan could

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improve digital connectivity by supporting the development of the digital infrastructure that meets the needs of communities and businesses.

Recent advancements in free public wi-fi access in Fingal are commended in many observations received with recommendations that free public wi-fi access should continue to be expanded. Improvement and investment in our digital infrastructure and the widespread availability of a top-quality ICT network will be critical to the development of our economy.

It was noted in many submissions received that Fingal needs to make all possible provision to improve and prioritise digital connectivity and the rollout of broadband in areas outside of the main urban settlements, and particularly rural villages and farms, now considered essential for e-commerce post Covid-19. A number of submissions referenced places needing broadband or improvements to existing networks, including Naul, Oldtown, Ballyboughal, Garristown, Portrane, Donabate, Skerries, Deerpark and Claremont.

ICT Access and Education

The need for education and access to digital resources is noted in many submissions received. It is noted that access to education would reduce isolation and loneliness for the elderly and improved education in IT skills for young people and ICT training is needed for all, particularly the elderly. Several submissions noted that ICT infrastructure in public buildings should be proactively planned and future proofed to support digital access and literacy.

The promotion of digital opportunities for both businesses and citizens including the provision of free public wi-fi in socio-economically disadvantaged areas and digital upskilling for more senior citizens was also highlighted in submissions received.

Other submissions noted that the Development Plan should include a Digital Infrastructure Plan to co-ordinate digital infrastructure. Future proofed Broadband must be included in all new builds and be a standard feature like other utilities such as gas and electricity. Digital inclusion is of critical importance to the long term development of enterprise, business and tourism.

The submission from the ESB notes that due to the extent and reach of the electricity network, additional masts may be required in some areas to ensure the delivery of 'smart metering' to all areas. ESB would welcome support in this regard in the upcoming plan. ESB encourages policies consistent with the Department Circular to allow for the improved development of telecommunications infrastructure, particularly broadband capability in the area.

Other Digital Issues

Many suggestions were included in submissions received including the suggestion of a Fingal App which shares information about landmarks throughout the County, similar to the App developed for statues in Dublin city.

Another submission recommended that Fingal's bins should have a QR code system similar to Dublin City Council which can be reported quickly if the bin is full / damaged.

Better communication and collaboration between all stakeholders in Fingal, Council workers on the ground, local groups and elected representatives to meet challenges of climate emergency. The Fingal Voices App in collaboration with Smart Dublin is good example. Other submissions also requested that Fingal County Council expand the Smart District rollout to additional towns and villages.

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ENERGY NETWORKS

A number of submissions requested improvement to the electricity supply and connection (outages and interruptions reported in Donabate, Rush, Howth and other areas).

Alternative Energy in New Developments

The need for alternative energy options in new developments was highlighted in many of the submissions received. It was requested that Fingal County Council should explore the use of geothermal and ground heat pumps, installing systems in Council offices, and as a condition of planning permission for any large scale developments. Another submission seeks to generate a scheme for local ownership (shared between local residents, businesses and county council) of electricity-generating infrastructure such as solar farms, land and sea windmills and photovoltaic panels across large buildings to offset emissions from cars, buses and tractors used locally.

Similarly, several submissions noted that rainwater harvesting and a minimum area of solar panels should be a feature of all new developments being granted planning permission. Other submissions suggested the installation of solar PV on all Fingal buildings and that the Council should seek to install Micro Power Generation for new and existing domestic and commercial builds, which would lessen the demand of electrical power from the power grid and lessen CO2 emissions.

A number of submissions requested that the new Development Plan needs to include development management standards that mandates the inclusion of green technologies into new buildings. The development management standards should include measures that lesson energy usage, take advantage of renewable energy, provide for improved ventilation and reduce heat-loss and allows for the capture and reuse of water.

To best support and promote new energy generation technologies, submissions received note that the Development Plan should provide for community-owned renewables; including biomass, anaerobic digestion, solar thermal and photovoltaic. Micro hydro and tidal are also potential sources. The submission from Gas Networks Ireland notes that anaerobic digestion facilities not only effectively manage waste but support circular economy principles. It is requested that there is support for anaerobic digestion facilities in the Development Plan, and this would support more innovative forms of waste treatment, waste reduction, recycling and energy re-use.

Observations note that energy infrastructure should focus on renewables and sustainability and that the Council should promote wind/solar power in appropriate locations. With so much of the County having coastal access, submissions note that the Council should look at investment in offshore wind development network that would power data centres with green, renewable energy and invest in data hubs across the County.

Several submissions noted that the new Development Plan should seek to take advantage of the huge opportunities a new green economy can bring and that new renewable energy projects, in particular in offshore wind, have the potential to provide considerable employment opportunities. In making a just transition, workers may have to leave polluting industries to enter a green task force and one observation notes that Fingal County Council should work with companies like the ESB to take a lead in developing renewable energy for Fingal.

The submission from Eirgrid highlights the strategic importance of the national electricity grid and the need for robust policies in the Draft Plan to support the development of a safe, secure and reliable supply of electricity to meet projected demand in accordance with relevant national policy documents relating to energy

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provision and climate change as well as relevant regional policy objectives 10.19-10.24 of the RSES which seek to ensure a long-term, sustainable and competitive energy future for Ireland.

Specifically, the successful implementation of Eirgrid's Development State Strategy – Your Grid, Your Tomorrow 2017(ENCL1) is considered imperative to meeting national targets for electricity generation, climate change targets and security of energy supplies. It is requested in this submission that the Development Plan should include a section setting out how the relevant policy documents relevant to the electricity supply have been considered in a holistic and integrated way to inform subsequent plan policy. The Draft Plan should also facilitate the development of grid reinforcements including grid connections and a transboundary network for the County and between all adjacent Counties as well as international connectivity. There are a number of network reinforcement projects planned in the Dublin Area which are of relevance to Fingal County Council

The submission from the ESB states that 40% of electricity generation will be from renewable assets by 2030 - 3.5GW of offshore wind, 8.3GW of onshore wind and 1.5GW of solar. It is noted that the NPF and the RSES contain promoting policies in relation to Energy infrastructure and the ESB supports the reinforcement of those policies at a local level. The submission supports the retention of existing Development Plan policies that support investment in networks and energy infrastructure and delivers the vision on Electricity Supply and Infrastructure, as outlined under Theme 7, Infrastructure & Utilities, in the Strategic Issues Paper. The ESB supports the vision set out in Theme 7 recognising the importance of the transition to a low carbon economy and support a review of Chapter 7 of the existing Development Plan in the context of full alignment with objectives of NPF and RSES and national guidelines.

The ESB submission also requests that the existing Wind Energy Strategy be reviewed, and it is noted that the continued cooperation and support of Fingal County Council will ensure the development of key supporting ancillary onshore infrastructure required for this emerging industry. It is also suggested that the Council consider adding a Renewables-Enabling Map suggesting preferred locations for FlexGen gas turbine plant and synchronous condensers in an updated Fingal Wind Energy Strategy.

ESB supports the continuation of Policy EN 14 on solar energy and requests that the Planning Authority should retain the option to grant permission for a longer period than 5 years in certain circumstances and permissions could be granted with a lifetime up to a max of 40 years.

The ESB also highlights that there is opportunity to include objectives to support energy security with the inclusion of specific policies supporting new technologies. Fingal should also strengthen its support for the roll out of EV infrastructure with inclusion of updated parking standards in the Development management Standards of the new plan.

Grants

The issue of grant assistance arose in a number of submissions with a request that Fingal County Council work with the Sustainable Energy Authority of Ireland (SEAI) to encourage homeowners in the County to upgrade (energy efficiency) and adopt renewable energy. It is noted that Small and Medium Enterprises (SMEs) should easily be able to apply for grants to install green energy technologies, which would be a small step towards a final transition to new green energy solutions.

Submissions also note the need to incentivise best practice energy saving retrofitting for households and energy saving/switching grants, supported by an ambitious apprenticeship scheme, with some requesting a review of the grant system, whilst others suggested the introduction of a grant for replacing open fireplaces with more efficient means of heating.

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The promotion of local sustainable energy community initiatives was noted, with the need to upgrade buildings, provide solar panels, promote LED public lighting initiatives and support local micro-energy generation. It was suggested that the Council should engage with community benefit funds arising from the Dublin Array and North Irish Sea Array projects to deliver community gains through these new renewables projects.

AIR QUALITY, NOISE, LIGHTING

The need to ensure that noise, air and water pollution is consistently and constantly monitored throughout Fingal and reported on/managed accordingly was highlighted in many submissions received.

Air Quality

The HSE submission notes that Fingal County Council should identify pollution 'hot spots' in the region and aim to reduce pollution through local action on these emissions. Other submissions noted concern with air quality on heavily trafficked routes such as the R132 and that more tree planting should be done to improve air quality on Main Streets, including Balbriggan.

The submission from Dublin Chamber highlights that the maintenance of water and air quality and sustainable water management should be an infrastructural priority in the new Development Plan.

Noise

The HSE submission requests that a Noise Impact Assessment is carried out for any development proposals in Fingal with the potential to give rise to significant noise impacts. Other submissions noted that new developments in Fingal must consider the impact of noise from existing noise sources, as noise pollution is even more important now with people working from home (post Covid-19). Noise pollution from bars in Clonsilla Village was noted in one submission received.

One submission requested that quiet areas in the County should be mapped and identified and FCC should implement measures to protect the quiet amenity of these areas.

Another submission requests that the Council develop methods to enact the EU Noise Directive by establishing noise limits for residential areas in the proximity of new roads and new developments and it is requested that Dr Troy bridge be included on the noise map.

Noise - Dublin Airport

A number of submissions were received relating to airport noise levels and the impact on adjoining communities. Submissions noted that measures to protect the health of local communities from the negative impact of current and future planned aircraft noise are inadequate and need to be significantly augmented. Submissions highlight that aircraft noise needs to be carefully and transparently monitored to mitigate the effects of noise pollution on surrounding communities. A meaningful complaints system and a guarantee of fair play to all residents regarding standard departure patterns is needed and robust and transparent noise monitoring must take place and adaptation grants for particularly affected areas facilitated.

One submission requests that Fingal County Council set up an Expert Group to review the future impact of Dublin Airport development/expansion on the surrounding communities. Another submission states that Fingal County Council is now the statutory body responsible for the protection of the population from noise pollution and asks when we will see proactive action to measure and control noise from the airport.

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The submission from TII requests that Fingal refer to the requirements of S.I. No. 140 of 2006 Environmental Noise Regulations and requires that development proposals identify and implement noise mitigation measures, where warranted.

A number of submissions oppose the DAA's removal of night time restrictions (specifically referencing Conditions 3 and 5 (Reg Ref: F04A/1755)) and it is noted that there are no fines, penalties or consequences for DAA in breach of compliance in excessive noise and flight path deviation. Submissions state that fines for breaches need to be introduced and one submission opposes DAA's proposed 'noise quota system'. Submissions request the Council to limit all flights from Dublin Airport to current noise preferred routes only and to restrict flights in and out of Dublin Airport between 12 midnight and 6am.

Other submissions note dissatisfaction with the Dublin Airport Masterplan and the failure to engage with residents of St. Margaret's. Submissions received also refer to 'RS' zoned lands in Swords, which are included within Dublin Airport's 'Noise Zone B' area, where residential development is not possible. As such, there is a clear conflict between the current zoning of these lands and their location within a Noise Zone which prohibits their residential development.

The submission from the Aircraft Noise Competent Auth (ANCA) recommends that the current and projected effects of aircraft noise are adequately considered and addressed in the Fingal Development Plan review, through the continued designation of appropriate and inappropriate permitted land use. It is noted that encroachment by noise sensitive development into areas incompatible with aviation activity should be prevented where possible. ANCA supports the continuance of night-time noise considerations through the Dublin Airport Noise Zones and supports the policy of aircraft noise impact assessment at planning application stage to ensure suitable building design.

It is also requested in the ANCA submission that consideration be given to any Noise Abatement Objective that may be in place for Dublin Airport during the preparation of the new Development Plan.

Lighting

A number of submissions referred to the need for improved street lighting and it was noted as problematic in a number of areas requiring upgrading and improvement, namely Baleally Lane, Rush, Chapel Lane, Porter's Lane, Portrane and Balrothery Village.

Other submissions requested that intelligent street lighting should be developed / installed so as only to illuminate when and where necessary, while other submissions request that all street lights be changed to LED bulbs.

The submission from the Department of Tourism, Culture, Arts, Gaeltacht Sport and Media encourages the inclusion of a Light Pollution Policy within the Development Plan.

The submission from Dunsink Observatory requests that a light pollution policy with an appropriate radius is created for the Dunsink area. This will ensure that light pollution is kept to a minimum, and the Dark Sky Zone is maintained for the function of the Observatory to be effective for the future.

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Other

Other infrastructure related submissions requested the undergrounding of wires and cables in a number of locations including Lusk, Balrothery Village and Rush.

CHIEF EXECUTIVE'S RESPONSE

Infrastructure provision covers many areas, from water and waste treatment, to energy and digital infrastructure. An overriding objective for infrastructure provision under the new Plan should be to focus on sustainable infrastructure which supports an improved environment and reduced emissions. Flood defences should aim to mitigate against the effects of climate change while also not damaging the natural environment or sensitive habitats. Energy infrastructure should focus on renewables and sustainability. Waste management should prioritise recycling and elimination of waste in the first instance.

As well as encouraging sustainable environmental infrastructure to be provided in new developments through the development management process, external stakeholders such as Irish Water, the ESB and Gas Networks Ireland are formal consultees and can again influence the delivery of key infrastructure through the statutory planning process. The availability of quality infrastructure has long been recognised as critical to productivity and competitiveness and the location and delivery of both regional and local infrastructure is critical to ensure that Fingal's Settlement Hierarchy is successful and that its economy can thrive as part of a wider city region.

WATER AND WASTEWATER INFRASTRUCTURE

Wastewater infrastructure

The submission from Irish Water (IW) and their recommendations for policy inclusion in the Draft Plan is noted. Fingal is committed to continuing to work with IW regarding strategic water service projects and drainage plans in our area and will continue to support efforts to improve the operational capacity of the wastewater network and sewage treatment infrastructure in line with environmental and climate resilience requirements. Fingal will continue to work proactively with IW across a number of different disciplines to progress enabling infrastructure projects County wide. It is recommended that policies and objectives to this effect are included in the Draft Plan.

Capacity constraints for new or existing development on future foul sewerage infrastructure is noted and this is a matter for IW. Subject to there being no capacity constraints, connections to any new foul sewerage system from an existing development will be subject to the requirements of IW. The detailed submission from An Taisce is noted. Wastewater treatment plant capacity is a matter for IW and Fingal County Council will follow the guidance of, and confirmation from, IW on wastewater treatment plant capacity in its decision-making process. All private wastewater treatment proposals are assessed for compliance with the Environmental Protection Agency (EPA) Code of Practice, other related regulations and Fingal Development Plan policies and objectives.

The submission requesting removal of the reference to the Greater Dublin Drainage Project (GDDP) is noted. The GDDP is a project to develop a new regional wastewater treatment facility and associated infrastructure to serve north Dublin and parts of the surrounding counties of Kildare and Meath. The GDDP is acknowledged as being a critical piece of national infrastructure under Project Ireland 2040 and will secure the long-term sustainable growth of the Greater Dublin Area.

The content of the submissions relating to misconnections and subsequent pollution issues are also noted. This is an operational issue and does not fall within the scope of the Development Plan. Dwellings and other buildings that have misconnections are requested to remove the misconnections within an agreed timeframe.

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The contents of submissions relating to wastewater upgrades, treatment plants and drainage projects are all noted. However, the Planning Authority has no direct control over the timing of any such upgrades or new schemes. These are made by IW and their timing is established in IW's Capital Investment Plans. Fingal will continue to work with IW to progress schemes in the Fingal area. Table 6 below highlights the projects within Fingal earmarked for completion within IW's investment period 2020 – 2024.

Issues relating to robust monitoring of the wastewater pumping infrastructure and the maintenance of an abstraction register and water storage facilities do not fall within the scope of the Development Plan.

Table 6: Extract from Irish Water Investment Plan 2020-2024 – Projects in Fingal

Project Name	Primary Asset Category	Local Authority Area	Project Description
Upgrade of Drinam PS and W & WW connection for 176 Res units	Wastewater Below Ground	Fingal	Upgrade of the Drinam Pump Station to cater for additional loading from a new development at Kettles Lane
Malahide WWTP	Wastewater Above Ground	Fingal	Upgrade of WWTP to protect environment and quality of receiving waters and facilitate growth
Local Network Reinforcement Project Fingal Lot C.	Wastewater Below Ground	Fingal	Provision for Local Network Reinforcement Project to facilitate future growth.
Network Extensions - Wastewater - Donabate Road	Wastewater Below Ground	Fingal	Programme to construct necessary wastewater network extension infrastructure in order to facilitate growth.
Howth Water Supply Scheme PH 3 & 2 Howth Water Supply Scheme PH 3 & 3	Water Above Ground	Fingal	Upgrade of existing trunk main supply from Dublin City's North Fringe at Baldoyle to Howth's Strategic Reservoir at Dungriffen and upgrade of associated pumping and disinfection infrastructure to improve DW quality.
Malahide Water Supply Scheme (SLI) Civil Works (Malahide Reservoir)	Water Above Ground	Fingal	Upgrade the capacity of the trunk water supply system between Swords and Malahide Reservoir providing DW quality and security of supply to Malahide and Portmarnock WSZ's.
Network Extensions - Water - Donabate Road	Water Below Ground	Fingal	Programme to construct necessary water network extension infrastructure in order to facilitate growth. The Water Network Extension program aims to increase the reach of Irish Water's mains network across Ireland by focussing on a number of prioritised settlements chosen in collaboration with Local Authorities.

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Water Supply and Water Quality

IW published its National Water Resources Plan (NWRP) in May 2021. This is the first NWRP and IW will undertake a review and update of this plan every five years. FCC will continue to work with IW to implement the policies and recommendations included within this NWRP.

Water quality, water conservation, including control and management of leakage is a matter for IW. In line with the NPF and the RSES, it is however recommended that the Draft Plan contain policies which support IW in their role in water quality, water conservation and addressing leakage.

The provision of an adequate supply of water and wastewater facilities is crucial to facilitate and sustain the growth of Fingal and the greater Dublin area. IW has responsibility for the provision of water/wastewater infrastructure and Fingal will continue to work with IW and the Regional Assembly to ensure that IW's Investment Plan fully aligns with Fingal's Settlement Hierarchy. Fingal supports IW's Water Supply Project for the Eastern and Midlands Region.

Policies and objectives contained within the Fingal Development Plan 2023-29 will continue to facilitate development by ensuring that optimum use is made of existing drainage and wastewater treatment infrastructure in the first instance and that further strengthening of infrastructure is focused on priority locations as identified in the urban settlement hierarchy in accordance with Irish Water, the RSES and the Development Plan.

The benefits of making Fingal's water supply more secure and resilient to climate change risks are recognised. IW's Water Supply Project for the Eastern and Midlands Region is supported by FCC and it is also recommended that greater water conservation is encouraged and that exploration of alternative sources such as rainwater harvesting is promoted as part of the Draft Plan policies.

Rivers and Coast

The content of submissions relating to the water quality of local streams, rivers and coastal waters is noted. Fingal recognises the need to maintain high water quality and ecological status in the County's waterbodies. Under the Water Framework Directive, the River Basin Management Plans identify pressures on water quality and set out a programme of measures and actions to improve water quality in our rivers, lakes, estuaries and coastal waters. Fingal County Council will continue to support initiatives to improve water quality and to achieve 'good ecological' status.

The National Marine Planning Framework is expected to be published in July 2021 and Fingal will have regard to the policies and objectives contained within this framework plan for our coastal areas. Fingal recognises the coast as a hugely important resource for the citizens of the County and the wider Dublin region, and will promote its sustainable development. The next Plan will support and promote appropriate development in suitable coastal locations, while ensuring coastal and environmental protection.

The increase in popularity of sea swimming and the need for year-round water quality testing is noted. The latest bathing water quality samples of 2021 (taken 8th June 2021) found all bathing areas to have 'Excellent' water quality. The *Bathing Water Quality Regulations 2008* set out our obligations for bathing water quality checks and public information during the bathing season. Bathing waters are sampled on a regular basis from the end of May to mid-September every year to assess the microbiological quality of the water and to minimise any public health risk. Fingal County Council will continue to work with the EPA to monitor bathing water quality. The frequency of bathing water testing and blue flag status are not a matter for the Development Plan. The principle of the issues arising in these areas will be reviewed at a strategic level to ensure that the relevant policies and objectives are in place in the Draft Plan.

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Flood Management

The submissions received raising the issues of surface water runoff and pollution are noted. The removal of surface water from combined systems is a matter for IW. For all new developments it is Council policy that separate systems are provided. These works are certifiable under Building Regulations by a project engineer / architect.

The content of the OPW submission and their request that the new Development Plan give a commitment to abide by the Section 28 Guidelines on Flood Risk and to include the sequential approach to managing flood risk and the precautionary approach is noted and welcomed. The recommendations included in the OPW submission will be considered as part of the review and updating of the Strategic Flood Risk Assessment (SFRA) as part of the Development Plan preparation and this SFRA is prepared based on the methodology set out in the Section 28 Guidelines.

FCC will continue to work proactively with relevant authorities, such as the OPW, on the identification of flood risk and development of additional flood risk management measures where necessary.

The submission from An Taisce and their comments on the application of the sequential approach are noted and will be considered as part of the review and updating of the SFRA as part of the preparation of the Draft Plan.

Localised flooding issues were flagged in a number of submissions with specific locations mentioned. The content of these submissions will also be considered as part of the review and updating of SFRA as part of the preparation of the Draft Plan.

The OPW published its CFRAMS Flood Risk Management Plan in 2018, identifying a number of projects in Fingal. FCC is covered by two Flood Risk Management Plans:

- *Flood Risk Management Plan for the Liffey & Dublin Bay River Basin (UOM09)*
Areas for further assessment included in this plan: Clonee, Belcamp park, Balgriffin, Kinsaley, Mulhuddart, Lucan to Chapelizod, Malahide, Sutton&Baldoyle, Sutton& Howth North, Swords South and Santry
- *Flood Risk Management Plan for the Nanny-Delvin River Basin (UOM08)*
Areas for further assessment included in this plan are: Donabate, Portrane, Balbriggan, Skerries, Lusk, Staffordstown/Turvey, Oldtown, Swords and Rush.

Fingal will continue to protect and enhance the County's floodplains, wetlands and coastal areas as vital green infrastructure which provides space for storage and conveyance of floodwater, enabling flood risk to be more effectively managed and reducing the need to provide flood defences in the future. This will also ensure that new development does not impact on important wetland sites within river / stream catchments. The County's floodplains are also being protected by way of technical input into forward planning processes such as the preparation of Local Area Plans, Masterplans etc.

The Council's 'Forest of Fingal - Tree Strategy' also recognises the significant part tree canopy cover has to play in Water Sensitive Design and Flood Risk Management.

Sustainable Urban Drainage Systems (SuDS)

The Council acknowledges submissions highlighting discrepancies that currently exist in terms of the calculation of SuDS areas and their inclusion within open space layouts of new development and the provision

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of adequate buffer zones and riparian corridors. It is recommended that these policies are reviewed in the preparation of the Draft Plan and a multi-disciplinary approach to the review and enhancement of existing policies and the inclusion of new policies in relation to wetlands, flood alleviation measures, public access to rivers and riparian/waterway/green corridors is being developed. To better inform the new Development Plan; the appropriate width of the buffer zone for Riparian Corridors requires further analysis in the context of recently completed international research. There is a requirement that as far as practical, that the design of SuDS should enhance the quality of open spaces. SuDS should not generally form part of the public open space provision, except where it contributes in a significant and positive way to the design and quality of open space.

Fingal acknowledges the many submissions received relating to SuDS designs and the need for innovating SuDS infrastructure. There is already a suite of sustainable measures required / promoted for all new developments as part of the Council's SuDS and Water conservation policies. Fingal County Council has also recently published its SuDs Guidance document entitled 'Green/ Blue Infrastructure for Development' (December 2020), with input from across the organization. The document is intended to guide applicants in the provision of SuDs for development through the planning process and a key objective is to provide clarity for developers and a general agreement across Fingal County Council sections at an early stage of the development process in terms of how SuDs can be incorporated on a development site. This document seeks to ensure the early consideration of surface water drainage management and open space provision in the development design process.

Greater emphasis on SuDs measures, including the recently prepared FCC SuDs Guidance document will be included in new Development Plan policies and objectives and it is recommended that current policies be reviewed and updated as part of the preparation of the Draft Plan.

Circular Economy, Sustainability and Water Conservation

The submissions noting the importance of the circular economy and sustainability are welcomed and Fingal supports the need to promote the reduction in water usage. Fingal will continue to encourage people to use less domestic water through a combination of education and awareness campaigns and it is recommended that the Draft Plan contain policies to reduce water and energy usage.

Climate change will also have significant future effects on the availability of water sources and on the capacity of water bodies to assimilate wastewater discharges through lower water levels in rivers and lakes in longer and drier summer periods. The impact of climate change on the water cycle and the resultant impact on water services and flooding therefore need to be considered in settlement strategies and it is recommended that policies to this effect be included within the Draft Development Plan.

To further raise awareness about climate change and water, primary schools across Fingal are to receive a weather station rain gauge as part of an effort by Fingal County Council to produce more detailed rainfall records for the county. The initiative was launched in June 2021 and FCC plans to distribute rain gauges to 100 primary schools across the County in time for the start of the new school year in September. The second phase of the project will be seeking schools to host an automatic weather station, which will be visible on Met Éireann's www.met.ie website and will provide real-time weather data. The information gathered will be used to provide a more accurate understanding of river response to different rainfall depths and can be used by the OPW, Met Éireann and Fingal's flood sections. Most importantly the project will help to further students' knowledge of the key challenges faced by society including climate change and flooding.

Issues relating to the provision of public drinking fountains and public refill stations for water, are operational functions of the Council and, therefore, are not a matter for the Development Plan. The principle of the issues

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arising in these areas will be reviewed at a strategic level to ensure that the relevant policies and objectives are in place in the Draft Plan.

WASTE AND LITTER MANAGEMENT

The Council acknowledges the many submissions received relating to the problem of illegal dumping, litter, overflowing bins, dog fouling on pavements and open space areas (and horse fouling, particularly on beaches). This is an operational issue and Fingal currently employs 6 no. Litter Wardens in conjunction with the Council's Dog Wardens, who carry out daily patrols throughout the County. The Council actively promotes education among dog walkers and the Council has recently installed 'talking lamp-posts' in popular dog walking areas throughout the County.

In addition, Fingal has continued use of CCTV at litter blackspots throughout the County to catch illegal waste dumpers and fly-tippers.

With the privatisation of municipal waste collection and disposal, Fingal County Council has now moved to a policy making and regulatory role, which includes responsibility for creating a Local Waste Management Plan and for dealing with any instances of illegal disposal of waste in their area and taking the appropriate enforcement action. Waste Management Policy for the Region is contained in the Eastern and Midlands Region Waste Management Plan (EMRWMP) 2015 – 2021. The overall vision of this plan is to rethink the approach taken towards managing waste and that waste should be seen as a valuable material resource.

Fingal acknowledges the submissions received in relation to recycling centres and the need for additional facilities and extended opening hours. There are over 60 no. Bring Bank facilities in Fingal which are open 24 hours a day and glass, cans and textiles can be recycled here. Fingal currently operate two recycling centres – at Coolmine Recycling Centre, Dublin 15 and Estuary Recycling Centre, Swords. The Recycling Centres currently accept a full range of recyclable materials, bulky waste, waste electrical and electronic equipment, household hazardous waste, paint tins, etc. Fingal will continue to identify suitable sites for bring banks to ensure that developing settlements have ease of access to such facilities, subject to funding and resources available, although it is acknowledged that there can be difficulties identifying suitable additional sites.

Submissions highlighting the need for additional bin collections on a weekly basis and the need for takeaways to reduce packaging are noted. Private bin collection companies manage household waste collection and this is governed by National Legislation and does not form part of the Development Plan process. Likewise, the issues raised in submissions relating to recycling depots, plastic bottle refund scheme, bulky goods collection services, opening hours of recycling centres and "zero-plastic" initiatives, are operational functions of the Council and, therefore, are not a matter for the Development Plan. The principle of the issues arising in these areas will be reviewed at a strategic level to ensure that the relevant policies and objectives are in place in the Draft Plan.

The submissions highlighting the need for additional public bins and more regular emptying of bins is noted. Bin collections are conducted as and when required and additional collections are conducted at and during the high season of business and this will be maintained. The need for segregated public litter bins and solar powered bins are noted in the submissions received. Currently, the majority of bins in the county are manually opened or hand operated however newer designs of bins now offer pedal actuated systems.

Submissions noting the need for waste management to prioritise recycling and elimination of waste in the first instance is therefore welcomed by the Council and it is acknowledged that the Council needs to further promote recycling to build on the successes of the recycling and drop centres and provide for greater penalties

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for littering. Specific climate action policies on re-usables encouraging a circular economy will also be a key focus in the Draft Plan.

Circular Economy and Recycling

Fingal Development Plan 2023-29 will support a move towards achieving a 'circular economy' which is essential if the County and wider Eastern Region is to make better use of resources and become more resource efficient. In line with the RSES and the EMRWMP, it is recommended that the Draft Fingal Development Plan embrace the circular economy approach in relation to waste management and will contain specific policies in this regard. Fingal County Council's Climate Change Action Plan (2019-2024) contains a range of measures to reduce greenhouse gas emissions and improve energy efficiency. One of its key aims is to trial recycling bins in regional parks. Promoting and delivering more sustainable forms of waste management in Fingal in line with circular economy principles will be central to the overall approach of the Draft Plan.

The Government has recently approved the general scheme of a Circular Economy Bill 2021, which is set to implement many actions from the Government's Waste Action Plan. New legislation is being prepared to implement a circular economy which will drastically change production and consumption.

The new Circular Economy Strategy will involve significant changes to production and consumption by limiting single use products and clamping down on littering and dumping among other measures. The new Circular Economy Strategy will be put on a statutory footing, meaning the Government will be legally required to develop a circular economy.

Waste Reduction Education / Access

Submissions highlighting the need for better education on recycling and education campaigns needed to highlight sustainable food waste management options and litter education programmes are noted and welcomed. A key component of Fingal's waste management policy is the development and delivery of a comprehensive education and awareness campaign to support and compliment the policy objectives contained within the Development Plan. The three Regional Waste Management Offices (RWMOs) have developed and delivered a campaign which is focused on the use of the brown bin, where appropriate, and the correct use of the recycling bin to increase quality and reduce contamination.

Fingal County Council employs an Environmental Educational Officer to promote Environmental Awareness Programmes within the County and the importance of promoting waste education to ensure the public are made aware of the need to segregate waste and to recycle on a day-to-day basis will be promoted throughout the Plan in updated policies and objectives.

Fingal County Council adopted the Fingal Litter Management Plan in May 2019. This plan sets out our objectives for preventing and managing litter in Fingal, and our implementation plan to meet those objectives. The Plan is action-based and focuses on the prevention, enforcement and management of litter, with the objective of a consistently cleaner environment for the citizens of Fingal. Our goal as a Council is to protect and enhance the natural and built environment of Fingal through effective education, awareness, monitoring and enforcement of this Litter management Plan and national legislation and policy. Fingal County Council will continue to work with and support local Tidy Towns groups and other community organisations.

The contents of the submissions highlighting the need to reduce paper distribution, to prohibit election posters and the distribution of Development Plan brochures is noted. In this current review and in the preparation of the new County Development Plan, Fingal will endeavour to reduce printed copies of all reports and of the Plan itself, with information available primarily online and through social media channels. The

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Council, through its environmental and awareness programmes, will continue to promote reduction, re-use and recycling and it is recommended the Draft Development Plan seeks to proactively address litter awareness / education through appropriate policy.

The submission received seeking to establish a Circular Economy Resource Campus in Fingal is noted and any application for such development would be assessed under the development management process.

The issues raised in submissions relating to insurance, design of litter bins, relocation of recycling bins, and silting levels in Howth harbour, do not fall within the scope of the Development Plan.

DIGITAL CONNECTIVITY

The importance of digital connectivity is noted in the content of many submissions received and it is acknowledged that there is a great increase in people working from home (post Covid-19). The need for high speed broadband to increase the number of people working remotely and to rejuvenate our towns and villages is welcomed.

The importance of broadband and the rollout of 5G is acknowledged in submissions received. The need for the rapid rollout of the National Broadband Plan was emphasized in the IBEC submission, which is also noted.

Fingal County Council is committed to assisting in the rollout of the National Broadband Plan and to developing and improving the County's digital infrastructure and services. One of the biggest obstacles in digital development is the lack of high-speed broadband and digital infrastructure. Although we have seen significant investment in fibre cable and mobile telecommunications from commercial investment in recent years, there is still a rural-urban divide in broadband services within the County. The *National Broadband Plan* has been set up to address the digital divide in rural communities and bring high-speed broadband to every home in Ireland. A Broadband Officer has been appointed by the Council to oversee the County's connectivity infrastructure. The role of the Broadband Officer is to provide a local point of contact for telecoms operators and the public regarding telecoms issues. They will also play the leading role as the *National Broadband Plan* is rolled out in Fingal.

The Council has no direct role in the provision of Wi-Fi or in the roll out of 5G telecommunications infrastructure. However, Fingal County Council will continue to support and promote the rollout of improved digital telecommunications infrastructure in the County and will include such policies and objectives within the Draft Development Plan.

Fingal will continue to develop and promote the implementation of the [Fingal Digital Strategy 2020-2023](https://www.fingal.ie/fingal-digital-strategy-2020-2023)¹, which was developed to encourage and support communities and businesses to reap the full rewards of a digitally enabled society. The Strategy sets out what the Council wants to achieve and outlines strategic goals and objectives to enable us to make the most of digital opportunities for Fingal.

The Strategy prioritises four key pillars; Digital Infrastructure, Digital Business, Digital Community and Digital Government.

The rollout of public Wi-Fi hotspots will be implemented on a phased basis in Major Town Centres, Town and District Centres, Local Centres and Rural Villages as set out in the [Fingal Public Wi-Fi Roadmap](https://www.fingal.ie/sites/default/files/2019-05/fingal_county_council_public_wifi_roadmap.pdf)². Public Wi-Fi hotspots will be installed in a variety of public areas including; town centre main streets, village centres, community centres and parks.

¹ <https://www.fingal.ie/fingal-digital-strategy-2020-2023>

² https://www.fingal.ie/sites/default/files/2019-05/fingal_county_council_public_wifi_roadmap.pdf

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Access to free public Wi-Fi in our major town centres and villages will be a major asset to our visitors, businesses and residents. Fingal will continue to improve access to free high-speed public Wi-Fi in our libraries, community centres and offices as well as expanding outdoor free public Wi-Fi to our town and village centres. In 2019, commercial outdoor Wi-Fi was launched in Balbriggan Town Centre. In Q3 2021, outdoor Public Wi-Fi will be launched in 18 town and village centres as part of the WIFI4EU voucher scheme, areas include; Blanchardstown Civic Centre, Blanchardstown Village, Castleknock, Clonsilla, Donabate, Garristown, Howth, Lusk, Malahide, Mulhuddart, Naul, Ongar, Portmarnock, Portrane, Rush, Skerries and Swords. Subsequent phases of the Public Wi-Fi Roadmap will see public Wi-Fi rolled out to other towns and villages across the County.

Remote Working / Co-Working Hubs

The large number of submissions referencing the need for remote working hubs and co-working spaces in our towns and villages is also noted. Fingal has established three Enterprise Centres around the County – Drinan in Swords, BASE in Mulhuddart and BEaT in Balbriggan – providing industrial and office units and standard services. These Enterprises Centres have a history of providing support, networking opportunities, business development support and links to enterprise support agencies, Third Level institutions and Research and Development (R&D) opportunities to start-ups and micro-enterprises.

All three Enterprise Centres show high levels of occupancy, ranging from 88% to 97% and currently support 69 businesses and 342 jobs. Fingal County Council is committed to assisting in the rollout of the National Broadband Plan and the rollout of community Wi-Fi Broadband Connection Points (or BCPs) being delivered by the Department of Rural and Community Development. BCPs are public locations which have been selected to receive high-speed connectivity as part of the National Broadband Plan. The locations have been selected by the local authorities and include public areas such as community halls, libraries, sports facilities, enterprise hubs, tourist locations and other public spaces. A select number of Fingal BCPs will offer remote working facilities as part of the Governments National Hubs Initiative – [ConnectedHubs.ie](https://connectedhubs.ie).

Fingal County Council will continue to facilitate the development of flexible co-working spaces and digital hubs that provide vital supports to entrepreneurs and support the local economy by enabling more workers to work and live in their local communities.

A number of submissions received requested that all future new builds should have high-spec broadband as a standard feature like other utilities such as gas and electricity. Access to digital high-quality digital connectivity infrastructure is vitally important for the future proofing of the way we live and work in Fingal. The Council will consider outlining a policy for new developments to provide open access connectivity arrangements directly to the individual premises to enable service provider competition and consumer choice in line with the requirements of the European Electronic Communications Code (2018).

Fingal County Council recognises the importance of this infrastructure being delivered in a strategic way to enable better co-ordination thereby avoiding inefficient, ad-hoc and inequitable provision. It is recommended that the Draft Plan include appropriate policies and objectives to support the telecommunication sector and facilitate the roll out of the necessary infrastructure.

ICT Access and Education

The need for education and access to digital resources is noted in many observations received. It is noted that access to education would reduce isolation and loneliness for the elderly and improved education in IT skills for young people and ICT training is needed for all, particularly the elderly.

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The Fingal Digital Strategy outlines a number of actions to improve access to digital resources and digital literacy supports. Fingal Libraries, Fingal community centres and Fingal Local Enterprise Offices offer a range of digital learning resources and supports for communities and businesses. Supports range from STEM events, to coding classes for beginners and digital skills classes for older people, to trading online voucher schemes for SMEs. Since the Covid-19 pandemic Fingal County Council's digital events, online educational resources and online enterprise supports have increased exponentially.

Smart Districts

Submissions requested that FCC expand the Smart District rollout to additional towns and villages. In 2020, working in collaboration with Smart Dublin, FCC launched 'Smart Balbriggan'. The Smart Balbriggan district aims to ensure that Balbriggan benefits from 'smart' and 'digital' initiatives with three strategic priorities: 1) community building, 2) job creation and economic growth, and 3) improved services and public realm. This Smart District will be used as a pilot location for digital initiatives to be trialled and tested and subsequently implemented across Fingal. FCC plans to implement more Smart Districts in the future.

Other Digital Issues

In 2019, FCC piloted the Fingal Voices App as part of the Unheard Voices SBIR (Small Business Innovation Research) project co-funded by Enterprise Ireland. The App was trialled and is currently being expanded and redeveloped as the Fingal App, with an initial focus on promoting the Fingal In It Together initiative. Residents will be able to download the app and see local news, events and local business content.

The digitalisation of Council services is a priority for the Council. To date this has included initiatives such as rolling out solar compacter/smart bins, trialling sensors on ring buoys and [Fingal Alerts](#)³ to provide alerts and notifications to citizens. The Council will continue to roll out new technologies to digitally enable the services that we provide to citizens and businesses, while at the same time delivering quality customer service through our Customer contact centre, thus providing a seamless experience both online and offline.

ENERGY NETWORKS

There were a number of submissions received relating to the energy network and infrastructure in Fingal and the content of these observations is noted. The Draft Fingal Development Plan will support the inclusion of policies which promote more energy efficient development through the location of housing and employment along public transport corridors, where people can choose to use less energy intensive public transport, rather than being dependent on the car.

The main energy networks currently serving Fingal and the wider Eastern Region are electricity and gas. ESB Networks and EirGrid are responsible for the electricity distribution and transmission system in Ireland and it does not fall within the responsibility of Fingal or come under the scope of the Development Plan. Gas Networks Ireland are responsible for supply, transmission and distribution of natural gas. In an effort to reduce our carbon footprint, it is necessary to diversify our energy production systems away from fossil fuels and towards green energy such as wind, wave, solar and biomass. Fingal will continue to promote the use of renewable energy sources such as district heating, geothermal and ground heat pumps, solar power, wind turbines, biomass, anaerobic digestion and micro generation of renewable energy. The submissions made by the ESB, Gas Networks Ireland and Eirgrid in respect to utilities infrastructure are noted and it is recommended their respective requirements inform the Draft Plan.

³ <https://alerts.fingal.ie/>

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Having regard to projected population growth and economic growth in the Region it is important that the existing electricity and gas networks can be upgraded to provide appropriate capacity to facilitate development of the Region. Improving energy efficiency is vital in order to reduce energy consumption while improving economic growth.

It will be an objective of the Draft Plan to support the development of a safe, secure and reliable supply of electricity which will support the development of enhanced electricity networks and facilitate new transmission infrastructure projects as proposed under EirGrid's Grid Development Strategy to service the existing and future needs of Fingal and the wider Eastern Region and to strengthen all-island energy infrastructure and interconnection capacity. Fingal will continue to work in partnership with existing service providers to facilitate required enhancement and upgrading of existing infrastructure and networks and support the safeguarding of strategic energy corridors from encroachment by other development that could compromise the delivery of energy networks

Fingal County Council will continue to support the roll-out of Smart Grids to support Smart Cities development to advance this sector. Increased connectivity with other grids is also needed and projects such as the North-South interconnector are of great importance for the Eastern Region and will continue to be supported in new Development Plan policy.

Energy generation and energy related activity in Fingal is likely to change significantly over the coming years as the move to a low carbon economy increases and this is reflected in the many submissions received on this issue. It will be necessary to update climate change, energy and renewable energy objectives in the Draft Fingal Development Plan in order to accommodate this move to a low carbon economy. Many submissions were received promoting renewable energy and the need for alternative energy options to be provided in new developments. The contents of these submissions is noted and welcomed. Fingal promotes the diversification of our energy production systems away from fossil fuels and towards green energy such as wind, wave, solar and biomass, together with smart energy systems.

Fingal County Council's Climate Change Action Plan (2019-2024) contains a range of measures to reduce greenhouse gas emissions and improve energy efficiency and includes 133 actions that are on-going or planned within the Council. The Council aims to achieve a 33% energy efficiency improvement by 2020 and a 40% reduction in Greenhouse Gas emissions by 2040. Fingal County Council will continue to support the implementation of the 'Strategy for Renewable Energy 2012-2020' (Department of Communications, Climate Action and Environment) and any subsequent plan, and the related National Renewable Energy Action Plan (NREAP) and National Energy Efficiency Action Plan (NEEAP) through encouraging the use of renewable energy as part of the development management process as well as investigating and promoting District Heating as an energy source for the County. The Fingal Development Plan will include a range of policies and objectives relating to Energy & Climate Change.

The Draft Development Plan will also include policies to encourage the sustainable development of the renewable energy sector in the County (including bioenergy, wind, wave, etc) due to the positive contribution it can make to the economy and to the achievement of renewable energy targets.

Many submissions noted the need for grant assistance and the need to incentivise best practice energy saving retrofitting for households. Issues relating to grants and tax incentives fall outside of the scope of the Development Plan.

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Fingal notes the submissions received promoting the potential of district heating as a future sustainable system to connect sources of waste heat/ power supply with areas of demand. District heating will be supported, where feasible, and we will consider including relevant policy objectives in the Draft Plan.

The National Marine Planning Framework (NMPF) is due for publication in July 2021. This document highlights the importance of sustainable renewable offshore energy projects and highlights that Ireland's east coast is a favourable location for the development of such activities. Fingal will have regard to the policies contained within the NMPF when reviewing policies to be contained within the Draft Development Plan.

It is recommended that Fingal include policies and objectives in the new Development Plan, which will support measures to adapt and diversify the national energy grid to phase out fossil fuels in favour of embracing a more diverse range of low, zero-carbon and renewable energy sources/ infrastructures and the Draft Plan will include proactive policies to support the renewable energy sector.

The importance of electric vehicles and the need for charging stations is acknowledged in many submissions received. In June 2020, Fingal County Council added a number of electrical vehicles to its fleet, including vans, tipper trucks, mowers and utility vehicles and is further evidence of the commitment of the Council to the transition to electrification of its fleet. The addition of these vehicles means that 15% of FCC's commercial fleet is now electric. The provision of sustainable transport for the County is a top priority for Fingal. Electric charging points have been installed in Council depots and car parks and the Council has also introduced the innovative charging points at street lights. FCC, in conjunction with the three other Dublin Local Authorities, is currently implementing plans for the roll-out of electric vehicle charging points across the County, which includes engaging with the market on how best to plan for a comprehensive, reliable EV charging infrastructure for Fingal and the wider Dublin region.

AIR QUALITY, NOISE AND LIGHT

Air Quality

The submissions highlighting the need to ensure that noise, air and water pollution is consistently and constantly monitored throughout Fingal and reported on/managed accordingly is noted and welcomed. Higher levels of vehicular movement on heavily trafficked routes and construction activity associated with increased development in Fingal, will intensify the importance of maintaining air quality and the need to manage the negative environmental and public health impacts of air pollution at source.

Air quality in the County is currently monitored by the EPA in cooperation with the Local Authority and current measurements are at acceptable levels and give no cause for concern. Fingal will continue to work with the EPA and other agencies to monitor the County's air quality and will also work with adjoining Local Authorities to prepare an *Air Quality Management Plan* in accordance with the forthcoming national Clean Air Strategy. Air pollution monitors are currently installed at a number of locations in the County and are monitored on an ongoing basis by the EPA and TII. No evidence exists to suggest any current requirement for additional air monitoring.

The Council will work with a range of stakeholders to continue to improve, provide and promote sustainable forms of transport such as walking, cycling and public transport as well as the use of EVs which will have a significant positive impact on air quality. Fingal will continue to engage with the EPA and will include policies and objectives in the Draft Plan to continue to monitor and improve air quality.

Noise

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As Fingal continues to grow, there will be an increasing requirement to proactively manage sound levels and sources of urban noise pollution in order to avoid adverse impacts on health, quality of life, the environment and wildlife.

The content of the submissions received highlighting noise levels associated with current and future Dublin Airport operations are noted. The Noise Action Plan for Dublin Airport (2019-23) is the first plan of its kind and it is primarily a tool for reporting the findings of the strategic noise maps, as produced by the Dublin Airport Authority (daa). The aim of this Noise Action Plan is to provide an overview of the Regulations, to review the results of the latest strategic noise maps for Dublin Airport and to set out an approach to the strategic management and control of environmental noise over the next five years having regard to the existing noise management framework.

This Noise Action Plan is designed to manage noise issues and effects associated with Dublin Airport in its existing two-runway operation, and where necessary, present measures to reduce the adverse effects of aviation noise where practical. In this sense, the Noise Action Plan describes the current situation according to noise metrics and indicators required by the Environmental Noise Directive and in use at Dublin Airport for noise management.

Fingal will continue to promote appropriate land use patterns in the vicinity of the airport flight paths and will resist new housing development in order to minimise the exposure of residents of such development to undesirable noise levels. This will also further reduce the potential for future conflict between airport operations and residents.

The Noise Action Plan for the County of Fingal (2019-23) provides an overview of the regulations, to review the results of the latest strategic noise maps for the FCC administrative area within the Dublin Agglomeration and to set out an approach to the strategic management and control of environmental noise for the period 2019 - 2023. It also provides the basis for feedback and input from the statutory authorities and the public to help inform the overall Dublin Agglomeration Noise Action Plan. This Noise Action Plan is aimed at managing environmental noise from road, rail and industrial sources within the FCC administrative area but excludes noise from aircraft (which is dealt with in the above Noise Action Plan for Dublin Airport).

Dublin City Council, Dún Laoghaire – Rathdown County Council, Fingal County Council and South Dublin County Council have prepared an ‘Environmental Noise Action Plan for the Dublin Agglomeration (2019-23)’. This plan is a continuation of the 2013-2018 Noise Action plan and sets out broad principles and actions to mitigate excessive environmental noise and protect areas of good acoustical quality within the Dublin Agglomeration. The Noise Action Plan covers the period from December 2018 to November 2023 and covers environmental noise from traffic and rail and excludes noise from aircraft, domestic activities, noise created by neighbours, noise at work places or noise inside means of transport or due to military activities in military areas.

The main purpose of the Noise Action Plan is to: -

- Inform and consult the public about noise exposure, its effects, and the measures which may be considered to address noise problems.
- Address strategic noise issues by requiring competent authorities to draw up action plans to manage noise issues and their effects.
- To reduce noise where possible and maintain environmental acoustic quality where it is good.

The Noise Action Plan is aimed at managing Environmental Noise and excludes, for the most part, noise from domestic activities, noise created by neighbours, noise at work places or construction noise as these can be dealt with under existing legislation such as the Environmental Protection Agency Act 1992 and Health &

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Safety legislation. This action plan does not include the impacts from aircraft noise as a noise source, as this is addressed in the Noise Action Plan for Dublin Airport.

Complaints of noise from various sources including loud music, barking dogs, DIY, burglar alarms and noise from pubs, clubs, factories and building sites is dealt with by Fingal's Environmental Health Section.

It is intended that the Draft Development Plan will include policies to reduce and mitigate the adverse effects of noise pollution associated with densification, the construction / operation of development and the operation of transport infrastructure, and by identifying, protecting and creating areas of low sound levels in accordance with Fingal's Noise Action Plan (2019-2023). It is also recommended that policies are included within the Draft Plan to address noise associated with Dublin Airport, in accordance with the Noise Action Plan for Dublin Airport (2019-23).

Light

The need for improved street lighting was noted in a number of submissions and the requests to utilise 'intelligent' street lighting is welcomed. The issue of obtrusive light is an ongoing concern and is acknowledged by the Council and all new lighting installations are designed to minimise obtrusive light while maximising the light reaching footpaths and roads in the County.

Fingal will promote the adoption of lower temperature (warmer colour) lighting, which provides the best balance of cost saving, road and personal safety through better balanced light and improved perception, as well as reducing environmental impact. Fingal will continue to have regard to best practice in public lighting. Fingal County Council's Climate Change Action Plan (2019-2024) contains a range of measures to reduce greenhouse gas emissions and improve energy efficiency. One of its key aims is to convert all public lighting in Fingal to LEDs by 2021.

The submission from the Department of Tourism, Culture, Arts, Gaeltacht Sport and Media encouraging the inclusion of a Light Pollution Policy within the Development Plan is noted and welcomed. It is recommended that the Draft Plan reviews and updates existing policy and promotes appropriate lighting installations designed to minimise light pollution / unwanted environmental effects while maximising the light reaching the public realm. It is also recommended that FCC will include an objective in the plan to protect estuaries and greenways from light pollution. Fingal's Draft Development Plan will continue to include policies to protect areas from light pollution and light spillage from flood lights.

The submission from Dunsink Observatory is noted and light pollution policies will be reviewed at a strategic level to ensure that the relevant policies and objectives are in place in the Draft Plan.

The Council acknowledges submissions requiring the undergrounding of wires and cables, particularly along Main Streets. The Council will continue to encourage utility providers to provide such infrastructure underground, where appropriate.

CHIEF EXECUTIVE'S RECOMMENDATIONS

- Facilitate the provision of the necessary physical infrastructure required to promote the sustainable development of the County and the Region.
- Continue to liaise with infrastructure providers to co-ordinate, inform and influence the timely provision of infrastructure and for the required enhancement and upgrading of existing infrastructure and networks

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and support these providers in their efforts to reinforce, strengthen and safeguard existing utility infrastructure and networks.

- Ensure that Sustainable Urban Drainage (SUDs) measures are incorporated into the Draft Plan to reduce the level of surface water run-off, improve water quality and contribute to adaptation to climate change through natural solutions
- Support implementation of the Council Climate Change Action Plan 2019-2024.
- Support the principle of the circular economy with inclusion of specific policies in the Draft Plan on re-usables and water and waste reduction. Promoting and delivering more sustainable forms of water and waste management in Fingal in line with circular economy principles will be central to the overall approach of the Draft Plan.
- Facilitate and promote the development of energy networks and ICT infrastructure where necessary to facilitate sustainable growth and economic development, subject to proper planning and sustainable development.
- Review and update policies relating to the buffer zones for riparian corridors and SuDS, having regard to recently completed international research and Fingal's SuDS Guidance document 'Green/ Blue Infrastructure for Development' (December 2020). A multi-disciplinary approach to the enhancement of existing policies and the inclusion of new policies in relation to wetlands, flood alleviation measures, public access to rivers and riparian/waterway/green corridors will be reviewed at a strategic County wide level.
- Support Irish Water's strategic water service projects and infrastructure improvements and engage with them to facilitate projects that deliver the water services infrastructure necessary to support Fingal's settlement hierarchy, sustainable growth and mitigation and adaptation to climate change in line with national and regional policy. Fingal will continue to support IW in their role in water quality, water conservation and addressing leakage.
- Support initiatives to improve water quality and to achieve 'good ecological' status in compliance with the Water Framework Directive and associated River Basin Management Plans, particularly those which employ nature-based management measures, and explore opportunities for targeted watercourse improvement interventions which are designed to deliver a wider range of environmental benefits.
- Promote opportunities for water conservation as part of new and retrofitted developments and encourage the consideration of alternative water sources.
- Advocate the principle of the circular economy to reduce water usage and promote conservation.
- Review existing policies and objectives relating to how coastal change is managed in the current Plan, in order to amend, augment and update as appropriate in light of developing national policy and submissions.
- Support Renewable Energy projects through the inclusion of appropriate policies & objectives, while also having regard to relevant national and regional policy for both on shore and off shore renewable energy.

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- Prepare an updated Strategic Flood Risk Assessment (SFRA) for Fingal and continue to work with relevant authorities on the identification and development of additional flood protection measures where necessary, to strengthen existing policies in relation to SFRA.
- Strengthen existing waste management policies and promote education and awareness on all issues associated with waste management, both at industry and community level, including the promotion of waste reduction by encouraging reuse, re-cycling and recovery of waste.
- Ensure the objectives of the Eastern and Midlands Region Waste Management Plan 2015-2021, or such plans as may be updated, are incorporated where relevant into the Draft Development Plan.
- Develop and support the implementation of the *Fingal Digital Strategy 2020-23*, to encourage and support communities and businesses to reap the full rewards of a digitally enabled society.
- Support the rollout of public Wi-Fi hotspots to be implemented on a phased basis in Major Town Centres, Town and District Centres, Local Centres and Rural Villages as set out in the Fingal Public Wi-Fi Roadmap and as part of the WIFI4EU scheme.
- Facilitate the coordinated provision of telecommunications/ digital connectivity infrastructure at appropriate locations throughout the County and extension of telecommunications infrastructure including broadband connectivity as a means of improving economic competitiveness and enabling more flexible work practices.
- Consider provision of open access connectivity arrangements within new developments to enable service provider competition and consumer choice in line with the requirements of the *European Electronic Communications Code* (2018).
- Support the preparation of an evidence-based Air Quality Management Plan and continue to work proactively with the EPA to monitor and improve air quality in Fingal.
- Support the proactive management of noise by strengthening existing policies in relation to the strategic management, monitoring and mitigation of noise pollution and support the Noise Action Plan for the County of Fingal 2019-2023 and the Environmental Noise Action Plan for the Dublin Agglomeration 2018-23.
- Provide policies in the Draft Plan to address noise associated with Dublin Airport, in accordance with the Noise Action Plan for Dublin Airport (2019-23).
- Promote appropriate lighting installations designed to minimise light pollution / unwanted environmental effects while maximising the light reaching the public realm.

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OTHER ISSUES

Submissions received:

FIN-C377-7, FIN-C377-16, FIN-C377-17, FIN-C377-26, FIN-C377-53, FIN-C377-61, FIN-C377-68, FIN-C377-70, FIN-C377-71, FIN-C377-73, FIN-C377-77, FIN-C377-79, FIN-C377-86, FIN-C377-92, FIN-C377-95, FIN-C377-97, FIN-C377-98, FIN-C377-99, FIN-C377-101, FIN-C377-102, FIN-C377-105, FIN-C377-110, FIN-C377-116, FIN-C377-118, FIN-C377-119, FIN-C377-124, FIN-C377-125, FIN-C377-127, FIN-C377-128, FIN-C377-148, FIN-C377-150, FIN-C377-151, FIN-C377-152, FIN-C377-153, FIN-C377-156, FIN-C377-158, FIN-C377-159, FIN-C377-160, FIN-C377-161, FIN-C377-162, FIN-C377-164, FIN-C377-169, FIN-C377-171, FIN-C377-174, FIN-C377-178, FIN-C377-179, FIN-C377-180, FIN-C377-182, FIN-C377-183, FIN-C377-184, FIN-C377-185, FIN-C377-186, FIN-C377-187, FIN-C377-189, FIN-C377-191, FIN-C377-205, FIN-C377-209, FIN-C377-210, FIN-C377-212, FIN-C377-218, FIN-C377-221, FIN-C377-226, FIN-C377-228, FIN-C377-230, FIN-C377-232, FIN-C377-233, FIN-C377-234, FIN-C377-235, FIN-C377-236, FIN-C377-238, FIN-C377-240, FIN-C377-242, FIN-C377-243, FIN-C377-244, FIN-C377-247, FIN-C377-249, FIN-C377-250, FIN-C377-254, FIN-C377-255, FIN-C377-259, FIN-C377-262, FIN-C377-264, FIN-C377-266, FIN-C377-267, FIN-C377-269, FIN-C377-270, FIN-C377-272, FIN-C377-273, FIN-C377-275, FIN-C377-276, FIN-C377-278, FIN-C377-279, FIN-C377-282, FIN-C377-283, FIN-C377-285, FIN-C377-288, FIN-C377-290, FIN-C377-291, FIN-C377-292, FIN-C377-293, FIN-C377-296, FIN-C377-298, FIN-C377-300, FIN-C377-302, FIN-C377-303, FIN-C377-306, FIN-C377-307, FIN-C377-309, FIN-C377-310, FIN-C377-313, FIN-C377-314, FIN-C377-316, FIN-C377-317, FIN-C377-319, FIN-C377-320, FIN-C377-322, FIN-C377-325, FIN-C377-327, FIN-C377-328, FIN-C377-329, FIN-C377-331, FIN-C377-332, FIN-C377-333, FIN-C377-334, FIN-C377-338, FIN-C377-339, FIN-C377-340, FIN-C377-341, FIN-C377-343, FIN-C377-351, FIN-C377-353, FIN-C377-355, FIN-C377-356, FIN-C377-357, FIN-C377-358, FIN-C377-359, FIN-C377-360, FIN-C377-361, FIN-C377-363, FIN-C377-364, FIN-C377-367, FIN-C377-369, FIN-C377-370, FIN-C377-371, FIN-C377-373, FIN-C377-374, FIN-C377-375, FIN-C377-376, FIN-C377-377, FIN-C377-378, FIN-C377-379, FIN-C377-380, FIN-C377-381, FIN-C377-382, FIN-C377-384, FIN-C377-385, FIN-C377-386, FIN-C377-388, FIN-C377-389, FIN-C377-390, FIN-C377-391, FIN-C377-392, FIN-C377-397, FIN-C377-399, FIN-C377-400, FIN-C377-402, FIN-C377-403, FIN-C377-404, FIN-C377-406, FIN-C377-407, FIN-C377-411, FIN-C377-413, FIN-C377-416, FIN-C377-418, FIN-C377-420, FIN-C377-421, FIN-C377-422, FIN-C377-425, FIN-C377-426, FIN-C377-427, FIN-C377-428, FIN-C377-429, FIN-C377-432, FIN-C377-438, FIN-C377-440, FIN-C377-451, FIN-C377-452, FIN-C377-454, FIN-C377-455, FIN-C377-456, FIN-C377-459, FIN-C377-460, FIN-C377-463, FIN-C377-464, FIN-C377-465, FIN-C377-471, FIN-C377-472, FIN-C377-473, FIN-C377-474, FIN-C377-475, FIN-C377-476, FIN-C377-477, FIN-C377-480, FIN-C377-481, FIN-C377-482, FIN-C377-484, FIN-C377-485, FIN-C377-486, FIN-C377-487, FIN-C377-488, FIN-C377-489, FIN-C377-491, FIN-C377-495, FIN-C377-496, FIN-C377-497, FIN-C377-500, FIN-C377-503, FIN-C377-505, FIN-C377-506, FIN-C377-507, FIN-C377-508, FIN-C377-509, FIN-C377-510, FIN-C377-511, FIN-C377-512, FIN-C377-513, FIN-C377-514, FIN-C377-515, FIN-C377-516, FIN-C377-517, FIN-C377-518, FIN-C377-519, FIN-C377-520, FIN-C377-521, FIN-C377-522, FIN-C377-525, FIN-C377-528, FIN-C377-532, FIN-C377-533, FIN-C377-534, FIN-C377-535, FIN-C377-539, FIN-C377-541, FIN-C377-543, FIN-C377-544, FIN-C377-545, FIN-C377-546, FIN-C377-547, FIN-C377-550, FIN-C377-551

This section captures issues not associated directly with the seven themes identified in the Strategic Issues Paper. The issues have been separated out into three sub-sections:

- Development Plan Issues
- Other Planning Issues
- Non-Planning Issues

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SUMMARY OF ISSUES

DEVELOPMENT PLAN ISSUES

• Land Use Zoning

A number of submissions refer to zoning in general and the need for Fingal to review our zoning designations and policies as part of the Development Plan review process. These are discussed under the applicable headings below.

It is requested that Fingal applies a consistent approach to land use zoning and community gain that balances the legitimate interests of transport providers and users, energy providers and users and local communities. It is also requested in submissions received that FCC consider the implications of land use policies on the strategic national road network as a criterion in determining the future land use zoning strategy to be outlined in the Development Plan and the Core Strategy. Many submissions refer to areas of the County where additional land could be zoned to meet housing demand, whilst other submissions note the need to review zoning categories to allow for additional land to be zoned for community infrastructure, employment uses etc. Many submissions request a review of the wording in the zoning matrix to address the new demands for the society we now live in and to review the use classes accordingly. Another submission requests that FCC consider the most appropriate way to phrase zoning objectives which maximise choice and minimise disappointment for all residents and employers in the County.

An Taisce note that a review and reversal of all current zonings which would exacerbate private car use and dependence as well as worsen urban sprawl is now required. It is also requested in submissions received that FCC consider the implications of land use policies on the strategic national road network as a criterion in determining the future land use zoning strategy to be outlined in the Development Plan and the Core Strategy.

Rezoning of lands for residential development to provide housing or infill housing for local family members arose in a number of submissions received, notably at St Catherine's Estate, Rush; Quay Rd, Portrane; Skerries, while other submissions requested that a study of the current zoning is required to better utilise the existing lands of Rush and that the special status afforded to the Channel Road/South Shore Road area should be maintained. Another submission requested that consideration be given to inclusion of Special Policy Area designations (similar to South Shore Rush) in areas such as Corballis /South Balcarrick, Donabate.

• Development Potential of Lands for Residential Development

A number of submissions highlight that the current Development Plan and the RSES outline the strategic location and potential development of a number of key areas of the County. In order for planning authorities to respond to National and Ministerial Directives, it is highlighted that it is important that well thought out policies, particularly for residential areas, are put in place to harness local sentiment and rebuff unfocused national policies around densification and building height.

A number of submissions request the rezoning of lands within the Dunsink area (which includes parts of Ashtown, Castleknock, Dunsink and Scribblestown). Submissions request that the land-use zoning matrix gives considerable flexibility to permit education facilities within the Dunsink area. It is also requested in another submission received that the lands adjacent to Ashtown Station be classified as a Tier 1 zoning designation, as per the NPF.

Many submissions request that FCC consider further allocations of residentially zoned lands adjacent to serviced towns/villages in Fingal. To ensure sustainable patterns of settlement and employment, it is important that the majority of new housing allocations are directed to areas within the Metropolitan Area of the County. FCC is requested in a number of submissions to review the current urban development boundaries

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in Fingal and to determine if, given extensive growth in population forecast for the county, changes should be made to the boundary to facilitate population growth in areas such as Malahide, Swords, Old Portmarnock, Kinsealy, Castleknock, Clonsilla, Lusk and Skerries.

It is noted in submissions received that lands, adjacent to the Clonsilla Station and the existing built-up area to the north of the rail line, constitute an opportunity for planned, compact and sustainable growth, via the expansion of the urban area. The significance of the site adjacent to high frequency, high capacity urban rail stations with Metropolitan area is noted. Another submission proposes a new development area centred on a new railway station located between Portmarnock and Malahide, contributing towards the achievement of national and regional policy objectives on sustainable transport and compact growth. Another submission requests that the area described as Lucan North be considered as a 'strategic development land bank' to provide for the development of a sustainable, vibrant, attractive and well-connected mixed-use urban district.

It was requested that FCC consider a new community housing model, 'Reimagined Suburbia', within the expanding urban area of Donabate at Rahillion.

Many submissions highlighted that strategic landbanks at Belcamp, Barrysparks in Swords, Lissenhall, and Dunsink are capable of supporting the achievement of NPF and RSES objectives and in this context a number of recommendations are made for these landbanks with submissions requiring changes to current Local Area Plan requirements to a preferred Masterplan approach, removal of infrastructure caveats relating to MetroLink delivery, change in zonings and re-examination of the County's quantum of zoned land in the County. Lissenhall is designated as a key future development area within Fingal. A number of submissions received request that FCC release this strategic landbank now and encourage residential development at this location.

It is also submitted that FCC should consider the Pavilions lands as a suitable location for residential development, as it meets the Tier 1: Serviced Zoned Land criteria. Submissions request that Howth be considered as a key growth centre within the County in line with the policies and objectives set out in the RSES and requests FCC to look at opportunities to provide for further appropriate zoning in Howth (including residential and employment-based zoning).

Submissions request that FCC consider (as already put forward in the draft Dun Laoghaire Rathdown Development Plan) the inclusion of a sustainable neighbourhood infrastructure land use zoning objective which aims to complement existing facilities and services including, but not limited to, education, community cultural, civic, recreational facilities, healthcare and religious facilities.

There were several submissions received which requested the retention of existing 'RS' zoned lands and requested that no further land use zoning be allowed, particularly in Balbriggan, Lusk, Howth, Swords, Rush and many other areas within the County, until the infrastructure badly missing and outstanding from previous plans to service existing developments over the past 20 years is implemented for the increasing population. These include schools, public transport, community facilities and adequate roads. Submissions request that Lusk Community College development and Rush and Lusk Educate Together National School development should be completed in advance of any further housing development permissions being granted.

• Fingal's Rural Villages and Town and District Centres

Submissions request that FCC examine the economic, social and environmental benefits of retaining lands designated as 'TC' Town and District Centres, e.g. Balrothery, as an opportunity for sustainable rural development in the County. It is requested that lands within the southern area of Malahide should be zoned Local Centre "LC", and the caveat stating that retail units up to 2500sqm NFA must relate to Level 4

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Settlements should be omitted. Another submission requests that Balrothery should be moved from Town and District Centre (TC) into Rural Village (RV). Submissions suggest that another “node” of development should be created to the east of Rowlestown at the confluence of roads in the townland of Lispopple and Rolestown.

It is submitted in many of the submissions received that there is a definite need for additional zoned lands within many of the rural villages of Fingal in order to accommodate future residential development during the lifetime of the next Development Plan and many submissions request that additional lands be designed for development within Naul, Rolestown, Lispopple and other Fingal Villages.

Submissions call for a systemic review of current zoning and development policies for rural villages. Significant recent housing development has occurred in many areas including Naul and Ballyboughal on the R108, which has no sustainable location basis and has created new areas of commuter housing with car dependence. A number of submissions request that the development boundaries of Fingal’s Villages are not extended. Submissions call for FCC to provide incentives for residential development along Main Street, Rush or alternatively to provide a specific rezoning for the Main Street in the interests of regeneration.

- **Commercial (including General Employment (GE), Rural Business (RB), Retail Warehousing (RW), Metro Economic Corridor (ME), High Technology (HT) and Food Park (FP) Zoning)**

It is submitted that zoning on commercial lands should be open enough to allow the maximum types of commercial activity on employment generating lands. There must be a certain flexibility when zoning employment creating lands to allow the widest range of employment creating land uses.

Another submission requests that FCC consider the most appropriate location for the provision of GE – ‘General Employment’ land uses and requests that a review of the quantum and infrastructural capacity of currently zoned ‘GE’ lands be undertaken prior to the introduction of a draft development plan. It is submitted that the most damaging zoning objective for any employment generating lands is the mono-land use zoning objective. Example of this is the ‘RW’ zoning to the right of the Spine Rd. at Airside, where majority of the existing established uses appear to be non-conforming and materially contravene the zoning objective.

It is highlighted in submissions that several commercial zonings contained within the current Plan would benefit from a review of the usages permitted in principle, including the ‘GE’ zoning objective, where hotels are not permitted. This issue is also noted in another submission which requests FCC examine the economic benefits of designating Business Parks and Industrial Estates (such as Damastown Ind Estate), as there is a conflict with use classes ‘permitted’ under GE and ‘not permitted’ under HT zoning objectives.

Another submission notes that lands in Swords are compromised by ME and HT zoning and result in the early phases of development being weighted towards non-residential commercial floorspace. A number of submissions received requested the rezoning of ‘GE’ zoned lands from ‘GE’ to mixed use or residential land use zoning categories including lands at Baleskin and Dubber, lands close to Charlestown Shopping Centre and lands at Whitestown Rush, which also requested the provision of a science and technology park including incubator units and a hotel. The extension of existing commercial and industrial land use zonings was also highlighted in some submissions received, including lands on the Balbriggan Road in Swords, adjacent to Tesco logistics Park. Submissions suggested changing the ‘RB’ rural zoning to ‘GE’ for lands within rural Fingal to cater for the changing nature of rural business within the County, with one submission requesting a change in zoning from ‘RB’ Rural Business to ‘RS’ Residential at Rush.

Submissions refer to FCC’s Variation No. 2 and notes within the ‘core area’ of Fingal that the ‘Self Sustaining towns’ have not experienced levels of sustainable employment. This imbalance in jobs provision in the defined

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Core Area requires a strong policy focus within the new Dev Plan. – i.e. the ‘GE’ lands at Skerries (Townparks) straddle the main commuter rail line. FCC is requested to broaden the vision for the ‘GE’ areas, to address Brexit challenges and focus more attention on outdoor living following Covid-19 and to formally designate ‘Dynamic Employment Clusters’ within towns, such as Skerries (Tourist Marine Lifestyle).

A number of submissions request that FCC review the most appropriate use of strategically located lands in the vicinity of Dublin Airport, including GE zoned lands at Cloghran. It is requested that consideration be given to the provision of office uses with gross floor areas of greater than 1,000 sq.m at locations zoned ‘GE’ subject to public transport accessibility or the specific requirements of larger occupiers.

The HSE requests that consideration be given to a change of zoning from objective ‘HT’-High Technology to a specific healthcare related zoning to facilitate the development of a modern health campus environment within the strategic land bank of the Lissenhall East LAP lands. Many submissions related to lands around the airport and the Metro Economic Corridor (MEC) and it is requested that the new DP should give consideration to providing for higher order uses, such as high technology, on strategically located lands along the Sword Roads Corridor. Other submissions relate to the strategic landbanks located along the MEC and request that FCC examine the economic, social and environmental benefits of releasing these lands between for medium to long term development.

The growing demand for logistics and warehousing in Fingal is also noted in the submissions and it is requested that the new plan should provide for expanded and consolidated employment areas within the County to facilitate low intensive logistic and warehousing uses in optimum locations, notably within close proximity to Dublin Airport. It is requested that FCC consider the most appropriate location for the provision of ‘GE’ and ‘HT’ land uses and undertake a review of the quantum and infrastructural capacity of lands currently subject to these zoning objectives prior to the introduction of a draft development plan. There was also a request that the ‘RB’ zoning designation be changed to agriculture (Rush).

Submissions request that the Fingal Development Plan 2023-2029 Core Strategy and Settlement Hierarchy reaffirm Lissenhall as a Strategic landbank suitable for large scale residential uses as part of a neighbourhood structure. However, this submission seeks to provide a suitable zoning objective to facilitate the development of the Emmaus Centre lands primarily for residential use and not for uses associated with Metro/ not contingent on delivery of public transport projects. Submissions request that lands at South Fringe (Santry) be zoned Objective “ME -Metro Economic Corridor” under the Fingal County Development Plan 2023-2029. Submissions refer to the re-zoning of lands at Barrysparks Swords and seeks to replace the Metro Economic Corridor ‘ME’ and High Technology ‘HT’ with a single coherent mixed-use zoning objective which provides for consolidation of urban growth and housing delivery at Barrysparks.

Submissions were received in relation to the ‘FP – Food Park’ zoning and notes that the vision of the state of the art ‘Food Park’ Zoning Objective has not been realised as envisaged during the lifetime of the current FDP 2017. Current ‘FP’ Zoning is restrictive in nature and contributes to ambiguity as to what constitutes ‘Food Park Related Only’. The limitations in the ‘FP’ zoning has resulted in food related companies locating on generic employment zoned lands contrary to the vision of FCC. Agri-business is key to food industry, however is not ‘permitted in principle’ on FP zoned lands.

There are several significant employment locations within Rural Fingal which have established uses that are not agri-food or food related, but which nonetheless contribute significantly to the economic growth and prosperity of the County. Two of these locations – M1 Business Park and Turvey Business Park are both located within rural areas and are zoned GE rather than RU. Another submission refers to a significant logistics facility at Belinstown, Ballyboughal and these lands not zoned for these uses. It is requested that these lands be

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provided with appropriate economic / employment zoning that acknowledges and supports these existing businesses.

• High Amenity

Several submissions request that lands designated in the development plan for industrial or high amenity, for example, which do not have required stated characteristics to justify such designation should not be so designated; it is submitted that such lands should be designated for more appropriate land use, including new housing.

A number of submissions seek amendments to this zoning category with specific emphasis on allowing infill housing for local family members. This was noted in a number of submissions with particular relevance to 'HA' zoned lands in Skerries, North Beach, Rush, Malahide, Donabate and Portrane.

Some submissions request that the HA zoning matrix is amended in the Draft Development Plan to facilitate the potential for 'Residential' development on Brownfield sites. A number of submissions requested FCC to consider the rezoning of lands (particularly at Rush, Lusk, Donabate, Skerries, Malahide, Castleknock, Ashtown) and specifically existing HA-High Amenity zoned lands to residential in the vicinity of serviced towns and villages within Fingal to provide for an increased quantum of housing within the hinterland of Fingal.

A large number of other submissions received request that no rezoning of any High Amenity Areas should be permitted. Numerous submissions also strongly oppose any future development on the lands at Howth Castle and request that these lands at Howth Estate remain zoned as high amenity. Another submission notes that the lands adjacent to Evora and Grace O'Malley estates are zoned amenity and should remain as such. Many submissions request that FCC ensure the maintenance of the High Amenity designation on Howth Hill and the Howth SAAO objectives. There is a sufficient quantum of residentially zoned land in the area and that Howth is an inappropriate location for any future intensive development.

• Greenbelts

A number of submissions received related to the current greenbelt designations in the County. Some submissions requested that existing Greenbelt (GB) lands in Swords, Portmarnock, Kinsealy, Malahide, Donabate, Skerries, Clonsilla and Hynestown (northwest of Tyrellstown and Kilmartin) be now zoned as 'RA' (Residential Area) or 'RS' lands. These submissions note national policy and refer to RSES and NPF policy and propose additional sites for housing and infrastructure in these greenbelt areas. A number of submissions request that FCC undertake a review of the quantum and infrastructural capacity of lands currently zoned GB to allow potential rezoning of these lands for housing. It is also requested that FCC take into account the new way to consider zonings as per the Tiered Zoning Approach contained within the NPF. Submissions called for the rezoning of lands from 'GB' to 'HA' at St. Doolaghs and the rezoning of lands from 'GB' to 'GE' at The Ward.

A large number of submissions seek the retention of the greenbelts in the County, with the importance of the greenbelt between Lusk and Rush highlighted in many submissions received. Submissions requested FCC to rezone areas for rewilding (e.g. greenbelts) and prepare management plans for these spaces in order to prevent further carbon loss from drought/damage / anthropogenic impacts.

• Community Infrastructure

Several submissions requested that additional lands in the County to be devoted to community infrastructure and general community uses with more 'CI' zoned lands required. Submissions noted that scarce commercial lands in our town centres should not be solely used for residential development.

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Submissions received requested the rezoning of a parcel of land on the Rathmore Road, adjacent to the Racecourse Commons Development in Lusk from residential to community use/open space. Another submission requested that lands at Knockdromin be identified for public space and community use, while another requested the rezoning of lands to the north of Donabate from 'HA' High Amenity to 'CI' Community Infrastructure. Lands at Kinsealy Lane were highlighted in the submissions received, requesting that this area be designed to provide community facilities for Kinsealy Village, while other submissions identified the site adjacent to Supervalu, Lusk and the area of wild grass land on the Rathmore Road, opposite Lusk Community Unit to be allocated exclusively for community use in the next Plan.

There was also the request for the removal of private nursing homes from 'CI' zones, whilst one submission requests that FCC give consideration to providing for a more flexible zoning on sports grounds (Suttonians RFC). Another submission requested that the existing St. Josephs School site in Rush be designated for community uses given its central location.

• Open Space

Numerous submissions requested that the Class 1 open space opposite "The Forge", Lusk, be handed over to FCC. Submissions also requested that FCC reconsider the appropriateness of the 'open space' zoning on the lands to the west of the Collegefort and Collegewood (Castleknock) residential area and requested a change in zoning from OS-Open Space to Residential. Another submission also requests that the existing 'OS' zoned lands at Porterstown, Clonsilla be changed to residential given the oversupply of open space for the area and in the context of facilitating sustainable compact growth alongside existing transport nodes. Another submission seeks the re-zoning of lands at Airside Motor Park Swords from 'OS' to 'GE'.

• Other zoning issues

Irish Rail requests that lands to the eastern coastline not be zoned for development unless a suitable bridge is built over the railway. Bridges under the railway should be avoided as they are disruptive to rail services to construct.

A new zoning objective is requested in the submissions; to manage and protect corridors for the transit and sustaining of pollinator species, whilst another submission requests that all "green assets" shall be zoned for biodiversity/essential public health amenity and would have legally protected status and that the land at Toberburr north of the Owens Bridge on the Ward River is unjustified and should be reversed.

• Development Plan Policy Objectives

Many submissions were received relating to existing and proposed Development Plan policies and objectives. These are discussed under the applicable headings below. An emerging theme in many submissions received was disappointment that many of the objectives which had been present in previous development plans have not been met and this has led to some apathy towards the planning process in general.

Several submissions sought the inclusion of policy objectives to develop inclusive urban and rural transport systems with better access for all citizens to increase public transport use. A number of submissions requested the retention of existing Development Plan objectives, including the retention and updating of Objectives SS08, SS12, SS13, SS14, WQ05, DMS57, DMS61, LO 20 (Lusk), LO 26 (Rush) and the retention of objectives relating to South Shore/Rogerstown, Rush and the retention of the objective seeking provision of a new train station at Baldongen. Alternative wording is suggested for the following objectives in submissions received: Objective BLANCHARDSTOWN 2 and 8, and Objectives ED84, ED40, ED41 and WQ05 in the current

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development plan. It is noted in one submission received that there has been no progress made on Rights of Way – Objective RF116.

• Sustainable Communities

Submissions received request that the Development Plan should include policies to support compact urban development, growth adjacent to public transport infrastructure, review policies and objectives in relation to lands in proximity to emerging proposed Luas stops and look to regenerate /repurpose underutilised sites adjacent to existing commercial centres, bus routes and planned public transport. The Development Plans should include provisions to increase implementation of safe, green cycle and pedestrian routes as a priority.

The need to control urban sprawl was highlighted in a number of submissions, noting in particular areas close to the Meath border. The amount of agricultural or green space land between Dublin and Meath has continually been chipped away at, in each successive development plan. It is requested that this issue should be specifically addressed via a policy in this development plan and that FCC adopt a regional approach to the protection of watercourses in co-operation with neighbouring counties.

Submissions noted that it should be a specific Development Plan Objective to deliver suitable locations for serviced sites with access to piped infrastructure for those wishing to build their own houses. A number of submissions request that Fingal adopt a policy to ensure that gated communities are not developed particularly in proximity to existing villages and settlements.

There is a call to include specific objectives in the Fosterstown Masterplan in the development plan objectives, with particular reference to height restrictions. It is also requested that an objective be included to provide for adequate storage for larger items at apartments, while the need for objectives to provide greater housing choice and more sheltered housing for the elderly was also highlighted in a number of submissions.

The importance of housing for the elderly and mixed-use housing was flagged in many submissions, with a more flexible approach needed for housing for all.

• Plans (Masterplan / Local Area Plan / Urban Framework Plan / Village Design Statement / Management Plan / Conservation Plan)

New development within the County should be based on a plan led approach such as LAP's and Masterplans to ensure that new development occurs in tandem with necessary infrastructure, amenities and services and areas such as Donabate, Rush and Lusk are cited in this regard. Outstanding LAP's and Masterplans under the current Plan to be prioritised for completion as part of the new Plan. In this context, a mid-term review of the current Plan should be undertaken to review progress and inform future timescales for the completion of outstanding LAP's or Masterplans.

A large number of submissions require Local Area Plans for various areas within the County such as the Dublin 15 areas of Hollystown, Kilmartin, Clonsilla and Mulhuddart, including future strategic landbank areas such as Lissenhall and Dunsink and some rural villages such as Naul, Oldtown, Coolquay and Rolestown within the County. A suite of proposals for public realm enhancement to be included in LAP's for some specific areas within the County and particularly for rural villages. A number of submissions also require specific Masterplans and Urban Framework Plans for areas such as Lusk and Castleknock. Village Design statements are also required for specific areas such as Balrothery.

It is noted that the requirement for a Masterplan on specific lands can act an impediment to the timely delivery of housing. In this regard, a new approach for the delivery of Masterplans is required to facilitate their prompt

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completion in the context of increasing housing supply. There are requests for the omission of LAP/Masterplan requirements relating to specific areas of zoned land throughout the County with some requests for Masterplan frameworks instead of LAP frameworks on specific lands to advance the development of strategic lands within the County. It is requested that the principles and objectives of some completed Masterplans within the County be incorporated within the new Plan in lieu of these Masterplan frameworks for specific lands. The provisions relating to the Masterplans for the Swords area is proposed in this regard. There is a number of specific requests for changes to specific provisions of adopted LAP's within the County. A number of submissions call for the implementation of objectives contained within many of the adopted LAP's and UFP's and Rush UFP is cited as an example in this regard.

Conservation Plans for specific key architectural heritage assets within the County including Management Plans for SAC and SPA areas are required to ensure their protection. Recreational Strategies for FCC owned Regional Parks such as Ardgillan Regional Park and Demesne is also required.

• Commercial & Employment Related Objectives

A number of submissions request that the Development Plan should attract jobs/employment to North Fingal and include a strategy on how to achieve this. The area concerned is west of Balbriggan (Masterplan areas MP4.D and MP 4.E - Fingal Development Plan Sheet 4). Balbriggan Digital Health Enterprise Zone (DHEZ) was also referenced.

Submissions cite concerns that there is no reference to the economic importance and benefits of the quarry and extractive industry within the Strategic Issues Paper and requests that the Draft County Development Plan outline the economic value and significance of the sector, building on the approach set out in the current Development Plan. It is requested that FCC carry out a review of all significant rural based employment centres and, where absent, provide additional policy and zoning support for same, as necessary. New policy for data centres is requested in the submissions. It is proposed that data centre policy should be refined to allow for suitable, unzoned sites, where a confluence of power and fiber infrastructure already exists, to be brought forward for this type of development.

• Objectives relating to Towns and Villages

Several submissions request the retention of existing objectives for Balrothery and suggest the inclusion of new objectives relating to building design standards, traffic calming, pedestrian crossing facilities, improvement of gateways to the town, preservation of views in the area, preservation of the setting of estate houses namely Glebe House, Hampton House, Inch House and Blackhall House. It is requested that Balrothery should be moved from Town and District Centre (TC) into Rural Village (RV).

The submissions request that FCC provides policies to support existing retail stores while promoting the development of additional retail stores of an appropriate scale, at suitable locations in the County. Requests that no policies are brought forward in the new CDP that could lead to restrictions on deliveries and advises that retailing, and larger format convenience retailing in particular, has very specific requirements relating to the access, servicing, shape, size, and morphology of sites.

Some submissions recommend the inclusion of an objective specifically for Main Streets that would allow the development of Hotels or Apartments above or behind Main Street units, that would encourage shops, restaurants and retail units on the ground floor, with apartments or hotel space above, that would regenerate and bring life back to our Main Streets.

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There were a large number of submissions received relating to home working and the need for remote working hubs. Submissions requested new objectives to ensure the development of Working from Home / Business Hubs in many towns and villages in Fingal.

Submissions recommend a number of proposals in relation to existing town and village centres within the County including an examination of the economic, social and environmental benefits of retaining designated TC - Town and District Centres within the County, supportive policies for the continual optimisation and diversification of uses within Major Town Centre designations within the County through own tailored density and design parameters and the Pavillions in Swords is cited as an example. An assessment of fast food outlets to prevent the proliferation of such a use together with supportive policies to facilitate the provision of premises for healthy eating, shared commercial kitchen spaces and production units to assist small enterprises and startup food businesses and supportive policies for existing and new retail businesses. Supportive policy for the efficient servicing of businesses and retail outlets in town and village centres is required. Public realm and shopfront improvement schemes are required for specific Main Streets within the County and Ongar Village in the Dublin 15 area is cited as an example in this regard.

• Rural Housing Policy and Rural Clusters

Submissions propose a number of recommended changes to the existing Rural Housing Policy, including, a review of the current Rural Housing Policy in the context of compliance with specific provisions of the RSES in the context of facilitating rural housing need, the relaxation or removal of criteria relating to the category of close family ties, alternative policy provisions to address housing need for established farming families within RU-Rural, HA-High Amenity and GB-Green Belt zoned areas, allow the provision of rural housing for family members within a 5km radius of the family home, a change in zoning from HA-High Amenity to RU-Rural to allow for the provision of infill housing for family members and areas within Rush are cited in this regard.

It is suggested that the reuse of vacant vernacular houses in rural areas including proposals for their sensitive rehabilitation should remain outside the criteria for rural housing provision. A number of submissions require either the designation of additional rural clusters in such areas as Tougher Hill, Milverton, Skerries, Collinstown, Corballis, Balcarrick and Donabate as well as the extension of existing rural clusters within such areas at Milverton, Skerries, Brownstown-Swords and Great Commons to address the housing needs of family members within rural areas and provide for a more consolidated and sustainable form of development particularly in rural areas adjoining good transport links as well as providing opportunities for remote working. One submission notes the absence of specific policy relating to rural clusters in the current Plan including locations and maximum numbers for same. A specific assessment of rural clusters to be examined in the context of designating and developing rural clusters to ensure the protection of their existing character.

• Natural Heritage and Biodiversity

A number of submissions received welcome policy objectives that will commit to protecting local biodiversity and natural heritage and the recognition that biodiversity is not just contained within specifically Designated Areas and a council commitment to reject proposals that would interfere with natural floodplains.

In relation to trees, it is suggested that consideration should be given to making Objective RF59 applicable across the whole county and not just Rural Fingal. Other recommendations in relation to tree retention policy are recommended in submissions received.

Several submissions request that FCC provide a policy to retain and promote all trees, woodlands and hedgerows on Howth Peninsula and other submissions note that SACs and SPAs needs proper management plans with associated objectives to enforce said plans and that these management plans need to be drawn up

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as a matter of urgency. It is also recommended that policy should be developed for Blanchardstown to improve the biodiversity of the area of Blanchardstown.

It is requested that a strategic objective be included within Theme 2 Climate Action and Theme 6 Green Infrastructure and Natural Heritage to work in partnership with Meath County Council and other neighbouring county councils to advance actions in areas of mutual benefit during the lifetime of this Plan.

• Open Space, Tourism and Recreation

A key objective of the new Plan should be to retain recreational lands especially those that offer a high value amenity to Fingal residents and tourists.

The Fingal Tourism Statement of Strategy and Work Programme 2017-2022 identifies a range of actions to develop and present Fingal's assets to the market. This strategy should be identified in the Development Plan and an objective ensuring its implementation.

Some submissions also request an objective supporting continued collaboration between the local authority, Fáilte Ireland and tourism stakeholders in the development and implementation of the Coastal Destination Development Plan and the Dublin Coastal Trail in the county. Tourism policies and objectives should be clearly set out where possible through the inclusion of maps.

It is recommended that a dedicated tourism strategy/chapter should be provided for in the new Development Plan.

The importance of blue flag status was raised in many submissions with a recommendation that the Development Plan should include objectives to return blue flag status to many beaches in Fingal, including South Shore beach.

There are requests to include an objective to have sensory gardens installed in Newbridge House and Park, Rogerstown Park and at the Corballis Nature reserve and within all public parks where calisthenics equipment is located. Submissions also note the urgent need to include a new objective in the Development Plan to upgrade or replace the steps to Balcadden beach to provide universal access to the beach.

• Built Heritage and Conservation

Several submissions request that FCC encourage and facilitate the sensitive reuse of vernacular houses or farm buildings for farm diversification, agri-tourism and rural development, including self-catering accommodation, arts or craft workshops and small-scale manufacturing. It is also requested that objectives be included to develop disaster risk reduction policies addressing direct and indirect risks to the architectural heritage and objectives to develop resilience and adaptation strategies for the architectural heritage in the County. Other submissions request that FCC provide a specific policy objective for Beechpark House and surrounding lands for the development of an integrated green tourism development or Metro economic zone that could respond to the surrounding amenity and recreational uses in the area and public transport accessibility. There was also calls to include a new objective to have Shackelton Mills which is a heritage property restored and developed during the course of the Plan.

• Community Infrastructure

Shortage of land suitable for community groups and religious groups in the Dublin 15 area and the need to develop community and religious facilities in the area for multi-ethnic groups was raised in some of the

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submissions received. A number of religious groups have had temporary facilities in inappropriate industrial settings and cannot find suitable sites due to the shortage of land zoned and located in Dublin 15.

Objectives must be included for the preservation, improvement and extension of amenities and recreational amenities. These should facilitate the provision and siting of services and facilities necessary for the community including recreational facilities and open spaces including sports grounds and playgrounds. Several submissions also request that objectives are in place to facilitate flood lighting systems at playing pitches, while another submission requests that the DP should include an objective that all community facilities, schools, and retail units cannot be changed following the agreed phased planning as stated at the initial planning stage.

• Infrastructure and Utilities

Some of the submissions received request the addition of policies with regard to postal facilities in the county, including the provision of new postal facilities and the enhancement of existing facilities, including operational requirements, the provision of postal infrastructure at suitable locations in Fingal, flexibility for car parking standards for postal facilities and the promotion of the integration of appropriate post office facilities within new and existing communities that are appropriate to the size and scale of each settlement. The submissions also call for the inclusion of waste management policies and objectives in the next Plan.

Several submissions called for the inclusion of waste management policies and objectives in the next Plan. Other submissions queried the appropriateness of retaining the light rail corridor objective on specific lands.

Dublin Port Company has recommended that the new plan include specific policies supporting the ongoing separation and growth of Dublin Port, including Dublin port facilities within Fingal, as provided for within the Dublin Port Masterplan 2040 (reviewed 2018). It is requested that FCC specifically identifies Dublin Port Road and Rail cargo traffic as strategic traffic; include an objective in the plan to prioritise the accommodation of Dublin Port traffic on the national primary road network; include an objective to support the ongoing operation and growth of Dublin port and retain policies ED11 and ED113.

• Dublin Airport Public Safety Zones & Noise Zones

Numerous submissions were received in relation to the airport, its associated noise zones and general airport operations. It is requested that the review process give consideration to the standards and limitations associated with the Dublin Airport Public Safety Zones which should be reviewed as part of the Development Plan process.

The submissions note that much of the 'RS' lands in Swords have already been developed for residential use, while some lands remain undeveloped. However, due to their position within Noise Zone B, residential development on these undeveloped zoned lands is not possible. As such, there is a clear conflict between the current zoning of these lands and their location within a Noise Zone which prohibits their residential development. This dichotomy precludes any development on these lands, to the detriment of the compact, sustainable growth of Swords. These two competing designations clash with one another, creating a policy anomaly that inhibits any development whatsoever.

To allow for the sustainable development of Swords, the submissions request that the zoning of lands should facilitate development, not obstruct it. To this end, undeveloped lands zoned 'RS' in Noise Zone B must be rezoned as part of the forthcoming Development Plan so as to facilitate the compact and sustainable growth of the town.

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Submissions also raise concerns that rural living has become unsustainable both for agricultural operations and for habitable purposes having regard to current Development Plan policies on noise and air safety. Close family members are in effect being excluded. The submissions request that a study be carried out of community needs and future needs with a view to creating a new rural environment adjacent to St. Margaret's but outside the inner noise zone. It is suggested that an area be designated in the former Thornton Prison lands, which would be offered as an alternative site to the residents of St. Margaret's.

A number of submissions were received in relation to the airport, its associated noise zones and general airport operations. The Airport Noise Competent Authority (ANCA) requests that consideration be given to any Noise Abatement Objective that may be in place for D. Airport during the preparation of the FDP.

• Flooding

The submissions received call for objectives that ensure that no development occurs on flood plains and historical flood risk areas in the next development plan. Larger buffers from rivers are requested. At least 30m for all rivers and 50 for rivers that currently have a 30 metre buffer objective. It is also requested that FCC include objectives requiring assessment of CO2 impacts /emissions produced by proposed developments and how to neutralise them (tree planting etc). Objectives and zoning are required in relation to sea defenses in high erosion areas and in relation to bogs and lakes.

• Map based Objectives

A number of submissions received requested the inclusion or omission of specific map-based objectives in the new Fingal Development Plan. Some submissions request the inclusion of a specific objective in the Draft Plan to review the current designation of lands at Luttrellstown and examine the potential of these lands, part of which are designated as an SAAO for the development of a Regional Park in the context of the national, regional and local policy context.

Several submissions also requested that new objectives be inserted to develop walkway / cycleways at Broadmeadow Estuary, St Margaret's, Rolestown, Knocksedan, Donabate, Malahide, Balheary Road and other destinations within Fingal. Other submissions requested the removal of existing specific objectives on lands in Fingal, including a site at Golden Ridge, Rush, where it is requested that FCC remove a 'Proposed School Site' Objective, as it is submitted that it is no longer merited having regard to the current and projected capacity of primary and post-primary schools located in Rush.

Submissions requested the removal / amendment of mapped Objective GIM21 in the South Shore area of Rush. Numerous submissions requested the inclusion of a new specific objective for Howth Castle, to protect and strengthen these and other lands that offer a high value amenity to Fingal residents and tourists. It is also requested in submissions received that the new DP includes an objective at Howth Castle to protect and strengthen public access to lands (whether publicly and privately owned).

There are also requests that FCC make the view from the upper end of Dunbo Hill to Howth Harbour a protected view. Submissions received also note the urgent need to insert a new specific objective to upgrade or replace the steps to Balcadden beach to provide universal access to the beach.

A number of submissions related to the current 'density cap' objectives, which restrict the density of development of lands in a number of locations in Fingal. Other submissions requested that FCC remove this restrictive density cap placed on residentially zoned lands within the development boundary of Malahide, having regard to the strategic national and regional objectives of the NPF and RSES. Another submission

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received refers to a site in Lusk, which is zoned residential and a condition states that it should be low density and it is noted that this does not comply with local and national housing policies.

A number of submissions request that FCC include a specific Local Objective 'To support the development of campus facilities to support the future use of the site by the Epilepsy Care Foundation including the provision of supporting facilities and complementary uses'.

Several submissions received state that where an existing recycling facility has been permitted and in operation for a number of years, the land-use zoning should be amended to allow for such uses under its list of uses 'permitted in principle' or a 'Specific Objective' should be designated to these facilities. Other submissions received also request that FCC include an objective to supplement any map-based objective that would support a new pedestrian or cycle connection between the town and the lands at Milverton. Another submission suggests that FCC map existing DDLETB/FET campuses and other post-compulsory or community-based learning sites, centres or organisations, to benchmark where learning, education and training provision already exists to support the economic, cultural and social development of Fingal.

• Development Plan Process

A number of submissions received related to the Development Plan process and the consultation period. It was noted in submissions that FCC have a commitment under the CAP 2019, to address Climate Change and that the distribution of the Strategic Issues Information Booklet, in hard copy, to all homes in Fingal seems to be at odds with that commitment. Another submission highlighted that the views from young people and children are requested (Page 3 of Booklet), and it is recommended that FCC, staff and councillors could consider engaging more with schools to reach young people.

Several submissions noted that it was very difficult to make a submission on line, and that the level of complexity required excluded certain age groups. It is recommended that a simple 'please attach your submission' is all that is required and a facility to attach it. Another submission flagged that the Strategic Issues Paper was not accessible due to the sharing system used.

Many submissions highlighted the important need to prioritise key development objectives in the Draft Plan with timelines for their implementation including an interim review. It is noted that FCC should define criteria by which development in the county can be monitored to assess compliance with the objectives of the Development Plan and that FCC should develop and publish specific performance indicators which establish how progress is quantified and measured.

It is recommended that progress is constantly measured throughout the timeframe of the plan and that an evaluation of the delivery of all key aims should be carried out. Submissions note that the results of progress reports should be made public and that FCC should highlight and promote areas where progress is being made and also examine areas where less was achieved and investigate the reasons why. Any barriers to the implementation of the key aims should be identified and it is recommended that local communities are involved in the monitoring process.

Development Plans are considered too short-term in nature and are overly influenced by developers / speculators. The submissions state that there is limited long-term planning for social housing and it is requested that developers / speculators should only have an input into the delivery of our plans and not in the formulation of our plans.

Submissions also recommend a number of points on the format and layout of the development plan.

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Many of the submissions received from members of the public and prescribed bodies request to be made informed of any further consultation periods in relation to the new Plan. One submission raises concern in relation to the overall Dev Plan process and the level of engagement with the public.

OTHER PLANNING ISSUES

• Enforcement

A number of submissions raise concerns regarding enforcement compliance relating to extant planning permission/development and the need for more proactive enforcement powers for Local Authorities and additional bodies as well as the provision of adequate resourcing of the Council's Enforcement Section to enable a greater level of enforcement compliance and monitoring. These same provisions should also be applied to the Council's derelict site functions. The issue of building regulation compliance was also raised. The principle of retention permission was also questioned.

• Development Management

Submissions require that the new Plan provides detail with respect to development management and guidance on a number of specific issues including the protection of the existing character of an area in the context of new development, preserve in-situ all historical sites and features as a priority or at a minimum, detailed record of such sites following excavation, high quality development and density provisions, promotion of green technologies, provision of adequate community infrastructure such as schools, open space and amenities in tandem with new development, provisions relating to wheel washing in the context of construction, promotion of biodiversity, protection of designated environmental sites, the application of the universal design approach and accessibility for all ages and abilities in terms of housing provision particularly under Part V obligations and the design of the public realm, car parking standards including standards for playing pitches, provision of a 10m buffer between existing playing facilities and new developments in urban areas, provision of soundproofing, EV charging points and aircraft noise impact assessment to ensure suitable building design.

Support for retention of specific noise and operational related conditions attached to the Dublin Airport North Runway permission is highlighted and noise sensitive uses should not occur within the vicinity of aviation related development. A site-specific assessment approach for commercial development proposals on lands within both the Noise and Public Safety Zones of Dublin Airport is required together with a review of the Environmental Resources Management (ERM) Report of 2005 relating to Public Safety Zones.

• Consultation and Ongoing Communication

Many of the submissions received highlighted the importance of ongoing consultation and communication between FCC and the local communities and between FCC and the prescribed bodies. It was a central theme in many of the submissions received and the need to engage with communities before granting permission for developments was mentioned many times. The feedback loop between local communities and the council needs to be improved and issues and requests need to be tracked in an open and transparent way. One submission stated that FCC need to ensure that every significant Council housing proposal is subject to public consultation, has a proper master plan, social and tenure mix, and that amenities and services are central to all significant plans.

The need to improve the effectiveness of the consultation process around developments was noted in many places, including Malahide village and with the residents of St. Margaret's.

It was highlighted that no pre-planning consultation arrangements exist for local residents in respect of significant planning proposals within their area and that Meeting Notes / Minutes issued following these pre-

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planning consultations with property developers are not visible to the public. There is a need to ensure on-line access to all planning documentation, including the minutes of all pre-planning meetings.

It was noted in another submission received that FCC should consult with An Post during the preparation of any future public realm and movement strategies, to ensure sustainable solutions are considered to maintain a sufficient level of access whilst also improving the appearance and function of town centre areas for the public. Another submission recommended that FCC and the OPW engage with local communities in the event of any future developments along the Royal Canal to work towards tangible solutions to address any concerns by residents.

Better communication and collaboration between all stakeholders in Fingal is needed, including Council workers on the ground, local groups and elected representatives to meet challenges of climate emergency. e.g. Fingal Voices App in collaboration with Smart Dublin is a good example. It was also noted in many submissions that there is a strong need to ensure a consultative committee exists between Fingal County Council and Meath County Council given the county border is at Naul. It is highlighted that Naul has been impacted environmentally due to activity on the Delvin river and issues in relation to wastewater treatment which will need a coordinated approach from both local authorities as well as Irish Water.

Inland Fisheries Ireland requested that they be contacted in relation to all works that may have an impact on surface waters. Recommends that the Plan should include a clear policy on the use of clear span structures on fisheries waters and that IFI should be consulted on any such proposed developments.

• Other Planning Issues outside the scope of the Development Plan

- Provide for a robust, secure and transparent planning process with strong supporting legislation, make planning decisions based on the wider good over limited narrow self interest
- Proposal to Govt to set up a working group to carry out a review of the planning and development systems, with the aim of bringing our Planning and Development process into line with international best practice.
- Create a programme to upskill existing local authority staff to provide a more active role in performing the planning including forward planning, regulatory policy, development management and enforcement. Ensure a greater pooling and sharing of specialist skills between local authorities and other public bodies, involved in planning and construction must occur.
- Opposed to SHD process and FCC has not been seen to oppose unsustainable development that ABP is fast-tracking. Reference to developments by Marlet, Tetrarch, Glenveigh and Howth Harbour dredging. SHD process destroying our green areas and communities. They bring nothing positive to D15.
- Levies on vacant and derelict sites should be increased to 14% from 7%.
- We must ensure that development levy schemes capture the existing needs and new needs of local authorities to fund facilities.
- Ensure substantial community gain from development levies and that levies are clearly spent on improving social, community and physical infrastructure in the areas in which they are collected.
- Bonds in place for the Ongar area need to be recouped and the monies ring fenced for improvements in the Ongar area.
- Create legal protocol into the Planning process whereby the definitive iteration of the public interest demands ecologically sustainable communities. All “Green assets” shall be zoned for biodiversity/essential public health amenity and would have legally protected status.
- Fingal restricts any future purchase of property development from investment funds and that the strategic (fast-track) planning process is altered, ensuring Fingal local planning authority have jurisdiction over planning in the county.

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- Neighbourhoods and their amenities should be protected under the proposed development plan and that the same standards and amenities which would be required with a new development should be protected in older developments where they exist.
- Requests that Fingal County Council takes Ongar in charge without delay.
- Guidelines for building density within established residential areas remain grossly inadequate - seriously under-representing the impact which high density building developments can create for neighbouring residents in terms of residential amenity; public open space provision (need well-demonstrated during these Covid-19 times); compatibility with adjacent residential estates, local heritage structures and ACAs; traffic congestion; car parking overflow into neighbouring estates and noise pollution.
- FCC to fully resource its Planning and Building Control Depts to be able to cope with any Developer applications to look at them in full context of end to end development rather than handling each Application.
- Unacceptable that Investment Funds (so-called Cuckoo Funds) can purchase the entire or a large proportion of completed units within a building development - effectively denying young families the opportunity to acquire and own their family home.
- The policy of allowing developers to buy their way out of green spaces must end.
- FCC must ensure a very strong emphasis on streamlining the taking in charge process.

NON-PLANNING ISSUES

There were a number of observations on other matters that are outside the scope of a Development Plan and planning in general. These include matters such as political/election signs, provisions of a Library of Things, need to avail of EU funding, enforcement of bye laws, dog attacks on sheep flocks, animal rights, home completion data, restrictions on the times of deliveries/collections to/from An Post facilities, introduction of a public interest test, anti-social behaviour and provision of services through direct labour.

CHIEF EXECUTIVE'S RESPONSE

DEVELOPMENT PLAN ISSUES

• Land Use Zoning

The submissions regarding land use zoning are noted. Pursuant to Section 11(2)(bc) of the Planning & Development Act, 2000 (as amended), specific requests or proposals for zoning of particular land for any purpose cannot be considered at this stage of the process. The proper planning and sustainable development of the area requires that a framework be agreed and that the re-zoning of land should only be considered in the context of this framework and of the overall land use zoning of the County. It would therefore be premature at this early stage of the process to make determinations on each individual re-zoning proposal. We will review land use zoning at the next stage of the process. Zoning in Fingal will align with the National Policy Objectives and Appendix 3 of the NPF and the RSES.

• Development Plan Policy Objectives

The submissions in relation to policy objectives for the Development Plan are welcomed and noted. Section 15(2) of the Planning and Development Act (as amended), requires the Planning Authority to prepare and present to the Elected Members a Progress Report not more than 2 years after the making of the Development Plan. The review, which was prepared in April 2019, gives an update on implementation of the Development Plan. In the review, each specific objective is identified and progress on implementation has been recorded. It should be noted that progress on the achievement of objectives involves co-ordination across a number of Fingal Council departments and external agencies and that many objectives are to be achieved over the

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lifetime of the Development Plan. FCC endeavour to implement the objectives of the development plan during the lifetime of the plan.

The submissions with recommendations for new and amended policy objectives are welcomed and these will be considered in the preparation of the Draft Plan. All of the objectives in the current plan will be re-examined and where relevant retained and or/amended.

Fingal's Rural Housing and Settlement Policy will be reviewed as part of the preparation of the Draft Development Plan.

• Map based Objectives

The submissions regarding map-based objectives are noted. The submissions call for the inclusion of specific new and amended objectives, and the omission of certain objectives. These will be considered in the preparation of the Draft Plan. Regarding submissions on objectives relating to density, FCC will align its policies on same with the NPF and the RSES, including any applicable Section 28 Guidelines issued by the Minister. All of the map-based objectives in the current plan will be re-examined and where relevant retained and or/amended.

• Preparation of Plans

The submissions requesting the completion of Local Area Plans, Urban Framework Plans, Masterplans and other planning framework documents is noted. FCC has employed a number of policy responses as part of our overall development approach, namely the adoption of LAP's and Masterplans across the County. 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. Proactive active land measures such as provision of LAP's and Masterplans across the County will continue to be part of the development approach and areas where they are required will be outlined in the Draft Plan.

• Development Plan Process

The submissions regarding the development plan process are noted. Having regard to the level 5 restrictions that were in place during the consultation process, it was considered that a hard document in the form of an information booklet issued by post was an appropriate consultation method at this time, in order to communicate and encourage people to revert online to more detailed information regarding the development plan process.

FCC will endeavour to improve aspects of the consultation portal where people encountered issues in the first consultation stage. Section 15(2) of the Planning and Development Act (as amended), require the Planning Authority to prepare and present to the Elected Members a Progress Report not more than 2 years after the making of the Development Plan. FCC will be carrying out this review for the new Plan also. The layout and chapters will be considered in the preparation of the Draft Plan.

OTHER PLANNING ISSUES

• Enforcement

Issues regarding enforcement and building regulation compliance, additional powers in relation to enforcement and derelict site functions of the Council as well as funding of the relevant departments responsible for these functions is outside the scope of the making of a Development Plan. The provisions relating to retention permission falls under the Planning and Development Act 2000 (as amended) and the

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Planning and Development Regulations 2001 (as amended) and any changes to the regulatory provisions relating to retention permission is a matter for the legislator at Government level.

• Development Management

Development Management policy and objectives will be reviewed as part of the plan making process. This comprehensive review process will take into account the outcomes of public consultations where appropriate, experience from development management, significant ABP decisions and the outcome of departmental and interdepartmental working groups within FCC. Policy objectives with respect to Development Management will be updated in line with all National, Regional and Local policy guidance.

Compliance with conditions on extant permissions relating to airport development is outside the scope of the making of a Development Plan. A recent review of noise zones relating to Dublin Airport was adopted under Variation 1 of the current Plan to allow for more effective land use planning for development within airport noise zones. FCC will continue to promote appropriate land use patterns in the vicinity of the Airport to avoid the potential for future conflict between airport operations and land uses. Review of Public Safety Zones is outside the scope of the making of a Development Plan.

The submission from Irish Rail requesting that lands to the eastern coastline not be zoned for development unless a suitable bridge is built over the railway is noted. FCC recognises the strategic importance of the rail network and the specific requirements that Irish Rail has with respect to railway safety. Fingal County Council will continue to work collaboratively with Irish Rail in this regard.

• Consultation and Ongoing Communication

Submissions in relation to the foregoing are noted. FCC is committed to establishing clear and open channels of communication between individuals, the general public, its Elected Members and relevant stakeholders based on the engagement commitments of the Council's Corporate Plan 2019-2024 which seeks to, 'engage and consult with citizens and stakeholders in a way that allows their views to be taken on board, through the use of both statutory and non-statutory processes'.

Apart from formal statutory consultation with the public and other stakeholders required under the Planning and Development Act 2000 (as amended) in relation to the plan making and development management functions of the Council, FCC is committed to continually improving and exploring different channels and means of communication and public engagement. While Covid-19 has brought challenges in terms of conducting traditional forms of consultation, FCC through its Communications Department are continually working on advancing new communication methods and have put in place new Communication Strategies and Plans in response to the pandemic which has seen a significant positive response from the general public. In particular, the use of technology has been to the fore in enabling the hosting of webinars and other similar events.

Communication and engagement strategies by FCC includes the use of social media, dedicated websites for plans/projects, on-line consultation portal, online displays, graphics, videos and presentations, podcasts, library displays and events, informal briefings on various Council projects to Elected Members and to the general public as well as conducting workshops with relevant communities in preparing studies and plans for local areas. A recent example in this regard includes the workshops facilitated by FCC pre-Covid-19 with residents of St. Margaret's in the preparation of a strategy for the area which was carried out as part of the adopted Dublin Airport Local Area Plan. Subsequently, certain specific enhancement proposals identified as part of the strategy are now being implemented under the Town and Village Renewal Scheme 2020. This demonstrates the constructive nature of direct engagement with communities in the plan making process.

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Regarding cross county/city issues, FCC through its various Departments will continue to liaise and cooperate with adjoining Local Authorities on cross-boundary issues of common interest which arise, including those areas relevant to DCC and MCC.

FCC is committed to establishing clear and open channels of communication between individuals, the general public, its Elected Members and all relevant stakeholders. The Council will endeavour to ensure high standards of communication and engagement and will explore new and emerging means of consultation into the future.

• Other Planning Issues outside the scope of the Development Plan

The content of all of the above is noted. Many of the issues raised including development contribution levies and taking in charge schemes are operational functions of the Council and, therefore, are not a matter for the Development Plan. Other issues including Local Authority staffing, building density guidelines, Governmental reviews of the planning process, the SHD process and investment funds' ability to purchase property do not fall within the scope of the Development Plan process. Planning policy guidance and objectives with respect to Development Management will continue to be updated in line with all National, Regional and Local policy guidance.

NON-PLANNING ISSUES

The contents of the submissions received are noted. The purpose of this Report is to set an overall strategy for the development of the County and a broad policy structure for the Draft Plan. Many of the issues raised are more appropriately addressed by other plans and programmes prepared or are being prepared by the Council or of other Public Bodies, and as such should continue to be considered in the most appropriate planning context.

CHIEF EXECUTIVE'S RECOMMENDATIONS

- Prepare a Draft Development Plan that complies with the provisions set out under Section 10(2)(A) of the Planning and Development Act 2000 (as amended), including Section 28 Guidelines and consistent with the NPF, the RSES and associated MASP.

SUMMARY OF ENVIRONMENTAL ASSESSMENT AND STRATEGIC FLOOD RISK ASSESSMENT (SFRA) RELATED ISSUES

Submissions received:

FIN-C377-35, FIN-C377-305, FIN-C377-326, FIN-C377-329, FIN-C377-359, FIN-C377-361, FIN-C377-376, FIN-C377-396, FIN-C377-428, FIN-C377-474, FIN-C377-506

SUMMARY OF ISSUES

Several submissions received in relation to Strategic Environmental Assessment (SEA) and Appropriate Assessment provided general advice, comments, and information on legislation and access to information. In relation to the SEA of the Draft Plan, reference was made to Article 13C of the Planning and Development Regulations 2001, as amended and Directive 2001/42/EC (The SEA Directive) as implemented in Ireland by the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) (as amended by S.I. No. 201 of 2011). In relation to the provision of Appropriate Assessment reference was made to Article 6 of the Habitats Directive.

It is advised that guidance papers provided by the EPA and tools such as the EPA AA GeoTool application and GSI Map Viewer are followed and utilised in the preparation of the environmental reports. The Eastern and Midland Regional Assembly is involved in an EU-funded European Spatial Planning Observation Network (ESPON) project entitled Quantitative Greenhouse Gas Impact Assessment for Spatial Planning Policy (QGasSP), the main objective of which is "is to produce a robust, simple and proportionate methodology that will allow competent planning authorities at national, regional and local administrative levels to quantify and forecast the influence of spatial planning policies on GHG emissions in a consistent manner." It is important that Fingal avails of the latest methodological tools such as QGasSP when it is available.

Several submissions raised issues in relation to protecting European sites, biodiversity, riparian buffer zones and addressing flood management. There is a general recommendation to engage with the relevant bodies at an early stage (Department of Housing, Local Government and Heritage (DHLGH); Environmental Protection Agency (EPA); Office of Public Works (OPW); Irish Water and National Parks and Wildlife Service (NPWS).

Submissions received request the SEA and AA include quantitative assessments of greenhouse gas emission impacts of spatial planning and transport and other infrastructure which will be delivered during the life of the plan.

In particular, the submission from the EPA recommends that FCC have regard to the 'SEA of Local Authority Land Use Plans – EPA Recommendations and Resources' in formulating the Draft Plan and SEA. In this regard, the EPA outlines the key recommendations to consider as well as relevant databases and mapping tools. In preparing the Draft Plan and SEA, FCC should ensure alignment with key relevant higher-level plans and programmes and ensure consistency with the relevant objectives and policy commitments of the NPF and the RSES Draft Plan as well as UN Sustainable Development Goal's (SDG's) and key actions for Ireland. Relevant SEA guidance resources and environmental mapping tools are recommended in this regard.

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The submission from the Department of Environment, Climate and Communications (Geological Survey Ireland) recommends using their various data sets which includes, groundwater, geological mapping, Tellus-Geochemistry of soils, surface waters and sediment and marine and coastal unit datasets when conducting the EIAR, SEA, planning and scoping processes.

Other submissions stated that environmental assessment for development plans should be carried out with adequate public input.

The Department of Tourism, Culture, Arts, Gaeltacht Sport and Media recommends there is an overarching commitment in the Development Plan to undertake Appropriate Assessment (AA), Environmental Impact Assessment (EIA) and Ecological Impact Assessment (EclA) as required and appropriate in relation to all downstream plans and projects. Where development projects arising from the CDP are not subject to EIA, assessment of the impacts to biodiversity will best be facilitated through the preparation of an EclA. The Department recommends including an objective in the CDP in this regard. Surveys carried out for the preparation of Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS) or EclA generally generate biodiversity data, and the Department encourages the Council to include as an objective in the CDP that this data is made available to the National Biodiversity Data Centre (NDBC) on an ongoing basis.

The Department would welcome the publication and all environmental reports associated with the plan-making process including the SEA Environmental Report, Natura Impact Statement (NIS), and SEA Statement and their retention on the Council's website for the lifetime of the Plan; together with other biodiversity plans or reports (such as the results of ecological surveys).

CHIEF EXECUTIVE'S RESPONSE

Pursuant to the requirements of Article 13C of the Planning and Development Regulations 2001, as amended the preparation of the Draft Plan will be subject to Strategic Environmental Assessment in accordance with the requirements of Directive 2011/42/EC and associated implementing Irish legislation. In accordance with Article 13C of the Planning and Development Regulations 2001, as amended, the Strategic Environmental Assessment process will be subject to consultation with the specified environmental authorities.

Pursuant to the requirements of Article 6 of the Habitats Directive (92/43/EEC), stage one Appropriate Assessment Screening and stage two Appropriate Assessment (AA) shall be carried out as part of the overall process.

Consultation with various statutory bodies (including the NPWS and EPA), best practice guidelines, published reports, most up to date data sets and live mapping will be used to inform the report and may be published as part of the final report.

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STRATEGIC FLOOD RISK ASSESSMENT (SFRA)

Submissions Received:

FIN-C377-32, FIN-C377-59, FIN-C377-136, FIN-C377-182, FIN-C377-229, FIN-C377-239, FIN-C377-257, FIN-C377-280, FIN-C377-305, FIN-C377-329, FIN-C377-361, FIN-C377-376, FIN-C377-396, FIN-C377-506, FIN-C377-526, FIN-C377-527, FIN-C377-529

SUMMARY OF ISSUES

A significant number of submissions focussed on the issue of Fingal's vulnerability to flood risks arising from climate change. They sought proactive strategic flood risk management through identification/ protection of floodplains from development, the roll-out of evidence-based flood risk monitoring/ reporting and the deployment of additional flood defences to ensure coastal protection.

It was also requested that current and future development areas are reviewed alongside existing flood maps.

Submissions focused on specific areas in Fingal and specific flood/coastal management requests, including Channel Road, Palmer Road and Brook Lane in Rush, the Burrow area of Portrane and the Rogerstown Coastal Flood Relief scheme.

The submission from the Office of Public Works (OPW) requested that the Development Plan give a commitment to abide by Section 28 Guidelines on Flood Risk including the sequential/precautionary approach to managing flood risk; ensure the inclusion of strategic objectives relating to flood risk and the principles of the Guidelines in the Draft Plan and address the following specific considerations in the Draft Plan as follows:

- Flood Risk Management Plans and Maps
- Arterial Drainage Schemes and Drainage Districts
- Land Protected by Agricultural Embankments
- Flood Impacts on Other Areas
- Natural Water Retention Measures
- Climate Change Impacts
- Coastal Management

CHIEF EXECUTIVE'S RESPONSE

The Strategic Flood Risk Assessment for the Development Plan will be prepared based on the methodology as set out in the Section 28 Guidelines and due consideration will be given to climate change impacts and the factors specified by the Office of Public Works (OPW) in their submission. The SFRA will be aligned with the SEA process. The Council will continue to work proactively with relevant authorities, such as the OPW, on the identification of flood risk and development of additional flood risk management measures where necessary.

The SFRA will inform land zoning in accordance with the OPW's 'The Planning System and Flood Risk Management - Guidelines for Planning Authorities' (2009) and will clearly set out measures to mitigate climate change

A multi-disciplinary approach to the enhancement of existing policies and the inclusion of new policies in relation to the SFRA is being developed.

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Specification or design of specific future flood relief measures lies outside the scope of a Strategic Flood Risk Assessment. However, the SFRA will inform development plan policy ensure any policy approach does not conflict with planned / committed flood relief scheme measures and will take account of any measures specified in CFRAM Flood Plans.

CHIEF EXECUTIVE'S RECOMMENDATIONS

- Prepare an updated Strategic Flood Risk Assessment (SFRA) for Fingal and continue to work with relevant authorities on the identification and development of additional flood protection measures where necessary, to strengthen existing policies in relation to SFRA.
- Ensure a sequential and precautionary approach to flood risk management in line with the requirements of the Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009).
- Ensure that the preparation of the Draft Development Plan is carried out in conjunction with the SEA, AA and SFRA processes in compliance with legislative requirements and section 28 Guidelines.
- In relation to Strategic Environmental Assessment, ensure the Draft Plan incorporates appropriate policies or objectives required to avoid or reduce significant effects on the environment identified in the assessment process.
- In relation to Appropriate Assessment, any mitigation measures proposed to avoid impacts on Natura 2000 sites outlined in any NIR to be prepared as part of the forthcoming assessment process, will inform and guide policy of the Draft Plan.
- Develop a multi-disciplinary approach to the enhancement of existing policies and the inclusion of new policies in relation to the SFRA.

Part 4: Chief Executive's Recommendations

PART 4

Introduction:

This element of the report sets out the Chief Executive's Recommendations on the broad policies to be included in the Draft Development Plan. It is presented mainly as a response to the issues raised in the public submissions. The statutory requirements of the Planning and Development Act, as amended must also be followed. The Draft Plan will have regard to Planning and Development Act 2000 (as amended), Section 28 Guidelines and be consistent with the National Planning Framework, the Regional Spatial and Economic Strategy and associated Metropolitan Area Strategic Plan.

Strategic Overview:

- Prepare a Draft Development Plan that complies with the provisions set out under Section 10(2)(A) of the Planning and Development Act 2000 (as amended), including Section 28 Guidelines and consistent with the NPF, the RSES and associated MASP.
- Incorporate climate action as an overarching and cross-cutting theme across the Draft Plan in line with policies and objectives contained in the NPF, the RSES, FCC's Climate Change Action Plan 2019-2024 and national legislation.
- Ensure consistency with the National Strategic Outcomes of the NPF and alignment with the UN Sustainable Development Goals in areas such as climate action, clean energy, sustainable cities and communities, economic growth, reduced inequalities and innovation and infrastructure, as well as education and health.
- Contribute to the creation of a more socially inclusive society by providing for appropriate community infrastructure and improving access to information and resources. Seek new innovative ways of enhancing social inclusion.
- 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.
- Prepare an evidence-based Core Strategy, Housing Strategy (including HNDA) and Settlement Hierarchy in line with the requirements of the Planning and Development Act 2000 (as amended) that is consistent with the objectives of the NPF, RSES and the MASP and relevant Section 28 guidelines.
- Promote the creation of high-quality places to live and that endorse the principles of healthy placemaking
- Through placemaking, which encompasses a multi-faceted approach to planning, design and management, continue to ensure the development of attractive places to live, work and recreate by supporting the development of sustainable communities, quality public realm, community facilities, design and standards and open space throughout the County.
- Continue to develop a strategic approach to town centre regeneration through the 'Town Centre First' Approach and by utilising existing buildings and unused lands for new development, promote residential occupancy in our rural towns and villages and provide for a mix of uses within these areas, including cultural and community uses and residential uses, as appropriate.

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- Add quality to the places where Fingal's people live, work and recreate by integrating high quality design into every aspect of the Plan promoting adaptable residential buildings and ensuring developments contribute to a positive sense of place and local distinctiveness of an area.
- Promote and facilitate the universal design approach into all developments.
- Support the economic development of Fingal in line with the policies and objectives stipulated in the National Planning Framework and the Regional Spatial and Economic Strategy and utilise active land measures such as provision of LAP's and masterplans across the County as part of the development approach for Strategic Development Areas and Corridors.
- Promote the sequential development of serviced of serviceable lands in accordance with the tiered approach to land zoning outlined in the NPF, the RSES and MASP and ensure co-ordination with other neighbouring planning authorities where strategic development corridors traverse county boundaries.
- Identify and support the provision of key enabling infrastructure at strategic development sites in Fingal County, as outlined in the MASP, to facilitate their release for development during the lifetime of the Development Plan.
- Consult with all relevant public service providers to ensure that zoned lands are serviced in a timely fashion to facilitate opportunities for employment, enterprise creation and residential development.
- Promote modal shift to public transport, walking and cycling, encouraging permeability and taking account of national and regional policy and guidance, while supporting an efficient and effective transport system.
- Work with TII and other national agencies, to protect and enhance the capacity of national routes, to minimise the impacts on the management of the broader network.
- Promote sustainable settlement and transport strategies within the county and identify measures, including targets for modal shift, to reduce energy use, GHG emissions and adaptation to climate change.
- Promote and facilitate the development of MetroLink, connecting Swords to the Airport and on to the City Centre.
- Support the delivery and integration of key transport enablers to accommodate growth over the plan period and beyond, consistent with the NPF and the RSES, including BusConnects, DART expansion, LUAS extension programmes and MetroLink, while maintaining the capacity and safety of strategic transport networks.
- Continue to support Dublin Airport as a key national asset to Ireland's economic success by ensuring appropriate policies and objectives are contained in relation to same in the Draft Plan, which will align with Dublin Airport Local Area Plan 2020.
- Promote sustainable development by providing for the integration of economic, environmental, social and cultural issues into Development Plan policies and objectives, utilising to that end the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) processes.

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- Prepare an updated Strategic Flood Risk Assessment (SFRA) for Fingal and continue to work with relevant authorities on the identification and development of additional flood protection measures where necessary, to strengthen existing policies in relation to SFRA.
- Promote and facilitate the long-term consolidation and growth of Swords as a Key Town including the provision of key enabling public transport infrastructure, including MetroLink, in accordance with the relevant provisions of the NPF, RSES, the MASP.
- Consolidate the growth of Blanchardstown and Balbriggan as set out in the Settlement Strategy for RSES and by encouraging infill development and compact growth rather than greenfield development and by intensification at appropriately identified locations.
- Consolidate the development and protect the unique identities of the settlement of Howth, Sutton, Baldoyle, Portmarnock, Malahide, Donabate, Lusk, Rush and Skerries.
- Develop an enhanced identity and link with Fingal for the wider communities of Santry, Ballymun, Meakstown/Charlestown, Finglas, and Lanesborough and define them beyond a South Fingal Fringe Settlement.
- Promote enterprise and employment throughout the County, including along the Dublin Belfast Economic Corridor, the Metro Economic Corridor, Swords, Blanchardstown and Balbriggan and work with the other Dublin Local Authorities to promote Fingal and the wider Dublin and mid-eastern region as an engine for economic growth.
- Safeguard the agricultural identity of North Fingal, promoting the rural character of the County and supporting the agricultural/horticultural production sectors.
- Provide viable options for the rural community through the promotion of appropriate sustainable growth of the rural villages and clusters, balanced with carefully controlled residential development in the countryside.
- Recognise the importance of and preserve greenbelts in Fingal in order to safeguard valuable countryside; to ensure that existing urban areas within Fingal do not coalesce, to ensure that citizens can enjoy the County's natural amenities and to strengthen and consolidate greenbelts around key settlements.

Theme 1 – People and Place:

- Promote compact growth in line with the NPF and RSES through the inclusion of specific policies and targeted and measurable implementation measures that:
 - encourage infill / brownfield development,
 - focus growth on the County's designated strategic development areas identified in the Metropolitan Area Strategic Plan (MASP),
 - promote increased densities along public transport corridors.
- Ensure that the Housing Strategy recognises the diverse needs of all of Dublin Fingal's citizens meeting, insofar as is feasible, their diverse accommodation needs.
- Accelerate the availability of lands ready for residential development by aiming to address current infrastructural deficits where these are known to be delaying residential development.

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- Promote residential development addressing the current shortfall in housing provision and meeting target guidance figures, through a co-ordinated planned approach to developing appropriately zoned lands at key locations, including regeneration areas, and vacant and underutilised sites.
- Promote the provision of affordable and social housing and specialised housing including sheltered housing and housing for people with disabilities.
- Continue to implement the Homeless Action Plan Framework for Dublin 2019 - 2021 and support related initiatives to address homelessness, including the work of the Dublin Region Homeless Executive. Consideration will be given to a supporting policy for the Housing First National Implementation Plan 2018-2021.
- Bring forward policies which will encourage upper floor conversions into apartments.
- Support and promote social inclusion in line with national and regional policy.
- Promote policies and objectives that support the needs of an ageing population in the community with reference to housing, mobility and the public realm having regard to Age Friendly Ireland's "Age Friendly Principles and Guidelines for the Planning Authority 2020."
- Include proactive policy to support local authorities, approved housing bodies and other sectoral agencies in the provision of a greater diversity of housing type and tenure, including social and affordable housing and exploring new models of low-cost rental and affordable homeownership.
- Secure the implementation of the Council's Traveller Accommodation Programme.
- Respond to rural-generated housing need by means of a rural settlement strategy which will direct the demand where possible to rural villages and clusters, and permit housing development within the countryside only for those people who have a genuine rural generated housing need in accordance with the Council's Rural Housing Policy and where sustainable drainage solutions are feasible.
- Support and protect rural villages by appropriate sustainable development to preserve the character and viability of the villages and to support local services.
- Encourage re-use and rehabilitation of existing housing stock in rural areas in preference to new build, and actively promote the protection of traditional rural buildings.
- Existing standards, policies and objectives will be reviewed to ensure they are in line with current best practice and advice on accessibility, including the Irish Wheelchair Association's (IWA) Think Ahead, Think Housing campaign, the IWA Best Practice Access Guidelines (4th Edition) and the National Disability Authority's guidelines including "Universal Design Guidelines for Homes in Ireland" and "Dementia Friendly Dwellings for People with Dementia, their Families and Carers".
- Foster the development of socially and economically balanced sustainable communities.
- Encourage appropriate residential, social and community uses in centres in order to enhance their vitality and viability and recognising diversity of communities.

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- Enhance and develop the fabric of existing and developing centres in accordance with the principles of good urban design.
- Secure the regeneration of areas in need of renewal.
- Develop, promote and implement policies and initiatives that shape and deliver quality public realm throughout the County.
- Ensure the timely provision of community services and resources, including schools, community, religious, and health facilities, required for the creation of sustainable communities.
- Promote objectives regarding the provision of appropriate community facilities across Fingal.
- Support objectives in the Draft Plan to provide appropriate childcare facilities.
- Support community engagement initiatives and the objectives of the Fingal Corporate Plan 2019-2024.
- Continue to support and facilitate the provision of appropriate burial facilities across Fingal.
- Continue to work collaboratively with Educational and Health care providers to ensure the timely provision of educational facilities, health care and community resources throughout Fingal. The Draft Plan will support the provision of healthcare facilities in line with national and regional policy objectives.
- Continue to support the expansion and growth of libraries as key community and cultural assets within the County.
- Continue the development of a hierarchy of multifunctional active and passive recreational open spaces and facilities to serve all age cohorts.
- Support sports, recreational and play amenities in the County for all ages and abilities.
- Identify existing Rights of Way where possible in accordance with the provisions of the Planning and Development Act 2000 (as amended).

Theme 2 – Climate Action:

- Incorporate climate action as an overarching and cross-cutting theme across the Draft Plan in line with policies and objectives contained in the NPF, the RSES, FCC's Climate Change Action Plan 2019-2024 and national legislation.
- Support implementation of the Council Climate Change Action Plan 2019-2024.
- Support Renewable Energy projects through the inclusion of appropriate policies & objectives, while also having regard to relevant national and regional policy for both on shore and off shore renewable energy.
- Consider the inclusion of objectives in relation to climate change adaptation to ensure climate change measures are not detrimental to heritage assets.

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- Promote the relevant measures to achieve a reduction in GHG emissions and energy use.
- Ensure that the county's need for sustainable environmental infrastructure is addressed in a way which contributes to wider climate action goals and targets.
- Support the move to a low carbon economy and update and provide new, where necessary, climate change, energy and renewable energy objectives in the Draft Plan in order to accommodate this move to a low carbon economy.
- Ensure the built environment is climate change ready by supporting climate change mitigation and adaptation measures as part of new and existing developments.
- Consider the inclusion of objectives in relation to climate change adaptation to ensure climate change measures are not detrimental to heritage assets.
- Review existing policies and objectives relating to how coastal change is managed in the current Plan, in order to amend, augment and update as appropriate in light of developing national policy and submissions.

Theme 3 – Connectivity and Movement:

- Provide for an integrated approach to land use and ground transportation, aimed at securing a modal shift to more sustainable modes of transport, i.e. cycling walking and public transport.
- Promote land use patterns which reduce the need to travel and support public transport including higher densities at public transport corridors and nodes.
- Support the delivery and integration of key transport enablers to accommodate growth over the plan period and beyond, consistent with the NPF and the RSES, including BusConnects, DART expansion, LUAS extension programmes and MetroLink, while maintaining the capacity and safety of strategic transport networks.
- Work with the NTA, TII, and other transport agencies in developing an integrated set of transport objectives for the County in line with the GDA Transport Strategy and National and Regional policy, encouraging modal shift towards more sustainable modes of transport and patterns of commuting.
- Implement the recommendations of the South Fingal Transport Study 2019.
- Support SMARTER Travel initiatives and ensure that the Draft Plan aligns with the NTA's Transport Strategy for the Greater Dublin Area 2016-2035.
- Seek to implement the provision of the Design Manual for Urban Roads and Streets (2019) in relation to the delivery of safe streets and overall best practice design and promote the principle of filtered permeability.
- Promote and help develop behavioural change initiatives at local level that encourage active travel and modal switch to sustainable transport modes.

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- Support the provision of Park and Ride facilities at suitable locations in accordance with proposals set out by the NTA.
- Support the Local Link Rural Transport Strategy.
- Review the standards and the car and cycle parking requirements for residential and non-residential development in line with national planning and transport policy requirements.
- Support the forthcoming 'Dublin Regional EV Charging Strategy' and the growth of Electric Vehicle use as an alternative to the use of fossil-fuel burning vehicles, through a roll-out of additional charging points at appropriate locations.
- Include sustainable transport indicators, including targets for mode share, to monitor the policies and objectives of the plan over its lifetime.
- Support the set up and operation of car sharing schemes to facilitate an overall reduction in car journeys and car parking requirements.
- Support the ongoing development of Dublin Port having regard to wider transport and infrastructural considerations for the Dublin region.

Theme 4 – Economy, Employment and Dublin Airport:

- Support economic growth within the County through strengthening and promoting the strategic importance of major urban centres of Swords, Blanchardstown and Balbriggan and of key employment locations such as Dublin Airport and Dublin 15.
- Maximise the economic potential of Fingal's unique strengths and advantageous position within the Eastern and Midlands region.
- Actively seek and facilitate continued opportunities for investment in and development of FDI and indigenous enterprises at appropriate locations in the County.
- Ensure there are sufficient quantum and appropriate types of lands zoned for commercial, enterprise and/ or industrial uses in urban and rural located centres in accordance with the Settlement Hierarchy.
- Prioritise locating quality employment and residential developments in proximity to each other in order to reduce the need to travel and ensure that suitable local accommodation is available to meet the needs of workers in the County.
- Ensure locating employment intensive land use zonings proximate to high capacity public transport networks and links thereby reducing reliance on private car transport.
- Consider the allocation of various sizes of land parcels for commercial, office, industrial uses in order to cater for a wide range of employment and enterprise formats.
- Liaise and engage with all relevant public service providers to ensure that zoned lands are serviced in a timely fashion to facilitate opportunities for employment and enterprise creation.

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- Utilise the measures and powers available to Fingal to encourage and promote the regeneration of areas in need of renewal, for instance in underperforming or outdated commercial and/ or industrial areas.
- Support and protect existing rural economies such as valuable agricultural lands to ensure sustainable food supply, to protect the value and character of open countryside and to support the diversification of rural economies to create additional jobs and maximise opportunities in emerging sectors, such as agri-business, renewable energy, tourism and forestry.
- Support and reinforce the retail strategy within the county having regard to the RSES, or any superseding regional retail strategy, and explore the opportunity to strengthen the retail function in Fingal's towns and villages.
- Facilitate and promote the development of tourism in the County and ensure that the appropriate policies, objectives and measures identified in the Fingal Tourism Strategy 2015-2018 and The Tourism Strategy 2017-2022 are aligned with and supported by policies and objectives in the Draft Plan.
- Balance protecting the landscape and natural heritage of rural Fingal with the need to harness and promote economic opportunities associated with rural life such as agricultural, horticultural, tourism and rural-related economic uses.
- Support and facilitate the towns and villages outdoor markets in towns and villages in Fingal.
- Encourage and provide for industry specifically linked to food, agriculture and the development of added value opportunities in these areas.
- Support the objectives and actions of the Fingal Agri-food Strategy 2019-2021.
- Liaise and coordinate with Fingal's Local Community Development Committee and Local Enterprise Office to ensure that the appropriate objectives, measures and actions included in the Local Economic Community Plan are supported by policies and objectives in the Draft Plan.
- Support the ongoing and continued engagement with neighbouring airport communities to ensure that the environmental impacts associated with the development proposals are carefully managed and mitigated through land use planning and environmental monitoring and review processes.
- Promote and facilitate different work practices that have developed recently and continue to support the existing co-working facilities throughout the county.
- Have regard to the recommendations of the Fingal Skills Strategy and support the delivery of the actions therein.
- Continue to support the Dublin Rural LEADER Programme and the Town & Village Renewal Scheme.

Theme 5 – Cultural Heritage:

- Support the promotion, protection and perseverance of the county's the unique cultural heritage.

PART 4

- Recognise the importance of our archaeological resource and provide appropriate policies to ensure its appropriate retention and recording.
- Ensure the inclusion of objectives in relation to climate change adaptation through relevant chapters/sections of the Draft Plan, to ensure climate change measures are not detrimental to heritage assets.
- Incorporate heritage features into infrastructure design at an early stage in the development planning and management process to protect and promote the cultural heritage resource and create awareness and interpretation.
- Continue to support and encourage the sympathetic and appropriate reuse, rehabilitation and retention of protected structures and historic buildings ensuring the special interest, character and setting of the building is preserved
- Promote the tourism potential of Fingal's cultural heritage and improve legibility by providing guidance for appropriate signage and interpretation in line with the Heritage Signage & Trails Guidance
- Ensure that the concept of sustainable development focused on the sensitive, appropriate and well-designed re-development and re-use of existing building stock of Fingal is interwoven through all chapters/sections of the Draft Plan. That the structure of each chapter addresses re-use first before giving direction for new build.
- Review and augment where appropriate the Council's policy and objectives for the protection of the historic demesnes/designed landscapes of the County, historic street furniture and historic thatched buildings.
- Incorporate a review of the Record of Protected Structures into the preparation of the new Development Plan and examine potential new Architectural Conservation Areas.
- Recognise the importance of the Irish language resource by highlighting the profile of the Irish language and ensuring that the naming of mixed residential and mixed-use schemes reflects local history, folklore and/or place names and are stated in the Irish language.

Theme 6 –Green Infrastructure and Natural Heritage:

- Promote an awareness of the benefits of Resilient Design and the multi-functional nature of Green Infrastructure. Apply principles of Green Infrastructure to inform the development management process in terms of design and layout of new residential areas, business/industrial development and other significant projects while maximizing the multi-functional nature of Green Infrastructure by ensuring the development of synergies between Public Open Space, Biodiversity, SuDS/Water Sensitive Design and Active Travel objectives.
- Support the Draft 'Forest of Fingal – Fingal Tree Strategy', the 'Keeping it Green – Fingal Open Space Strategy' and the Draft 'Space for Play- Fingal Play Policy' in the Draft Plan.
- Continue to support Fingal's Allotment Strategy, Community Gardens and promote re-wilding and pollinator initiatives within the County.

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- Support policies within the Draft Development Plan to enhance and promote access to the coast, including the promotion of coastal recreational facilities where appropriate.
- Promote the provision of wildflower meadows.
- Protect and enhance ecological diversity and the natural environment within the County.
- Support the development of the Fingal Ecological Network in line with the Fingal Biodiversity Action Plan.
- Continue to support the Fingal Invasive Species Action Plan.
- Promote rewilding and pollinator initiatives in Fingal.
- Promote biodiversity gain in new developments.
- Support the development of the Fingal Ecological Network in line with the Fingal Biodiversity Action Plan.
- Recognise and promote the diverse and key roles that parks, and open spaces have for placemaking and the development of Healthy & Sustainable Communities.
- Continue to support the “Keeping It Green – Fingal County Council Open Space Strategy” and future versions of the Strategy.
- Provide for appropriate protection of trees and hedgerows, recognising their value to our natural heritage, biodiversity and climate action and encourage tree planting in appropriate locations.
- Ensure the County’s natural coastal defences, such as beaches, sand dunes, salt marshes and estuary lands, are protected and are not compromised by inappropriate works or development.
- Consider including greater policy guidance on coastal zone management subject to forthcoming national guidance.
- Support the protection and promotion of Dublin Bay Biosphere, in particular as it relates to Fingal.
- Actively preserve and promote the landscape, natural life, economy and lifestyles of rural Fingal, protecting the area from inappropriate development and land uses.

Theme 7 – Infrastructure and Utilities:

- Facilitate the provision of the necessary physical infrastructure required to promote the sustainable development of the County and the Region.
- Continue to liaise with infrastructure providers to co-ordinate, inform and influence the timely provision of infrastructure and for the required enhancement and upgrading of existing infrastructure and networks and support these providers in their efforts to reinforce, strengthen and safeguard existing utility infrastructure and networks.

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- Ensure that Sustainable Urban Drainage (SUDs) measures are incorporated into the Draft Plan to reduce the level of surface water run-off, improve water quality and contribute to adaptation to climate change through natural solutions
- Support the principle of the circular economy with inclusion of specific policies in the Draft Plan on re-usables and water and waste reduction. Promoting and delivering more sustainable forms of water and waste management in Fingal in line with circular economy principles will be central to the overall approach of the Draft Plan.
- Facilitate and promote the development of energy networks and ICT infrastructure where necessary to facilitate sustainable growth and economic development, subject to proper planning and sustainable development.
- Review and update policies relating to the buffer zones for riparian corridors and SuDS, having regard to recently completed international research and Fingal's SuDS Guidance document 'Green/ Blue Infrastructure for Development' (December 2020). A multi-disciplinary approach to the enhancement of existing policies and the inclusion of new policies in relation to wetlands, flood alleviation measures, public access to rivers and riparian/waterway/green corridors will be reviewed at a strategic County wide level.
- Support Irish Water's strategic water service projects and infrastructure improvements and engage with them to facilitate projects that deliver the water services infrastructure necessary to support Fingal's settlement hierarchy, sustainable growth and mitigation and adaptation to climate change in line with national and regional policy. Fingal will continue to support IW in their role in water quality, water conservation and addressing leakage.
- Support initiatives to improve water quality and to achieve 'good ecological' status in compliance with the Water Framework Directive and associated River Basin Management Plans, particularly those which employ nature-based management measures, and explore opportunities for targeted watercourse improvement interventions which are designed to deliver a wider range of environmental benefits.
- Promote opportunities for water conservation as part of new and retrofitted developments and encourage the consideration of alternative water sources.
- Advocate the principle of the circular economy to reduce water usage and promote conservation.
- Strengthen existing waste management policies and promote education and awareness on all issues associated with waste management, both at industry and community level, including the promotion of waste reduction by encouraging reuse, re-cycling and recovery of waste.
- Ensure the objectives of the Eastern and Midlands Region Waste Management Plan 2015-2021, or such plans as may be updated, are incorporated where relevant into the Draft Development Plan.
- Develop and support the implementation of the *Fingal Digital Strategy 2020-23*, to encourage and support communities and businesses to reap the full rewards of a digitally enabled society.
- Support the rollout of public Wi-Fi hotspots to be implemented on a phased basis in Major Town Centres, Town and District Centres, Local Centres and Rural Villages as set out in the Fingal Public Wi-Fi Roadmap and as part of the WIFI4EU scheme.

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- Facilitate the coordinated provision of telecommunications/ digital connectivity infrastructure at appropriate locations throughout the County and extension of telecommunications infrastructure including broadband connectivity as a means of improving economic competitiveness and enabling more flexible work practices.
- Consider provision of open access connectivity arrangements within new developments to enable service provider competition and consumer choice in line with the requirements of the *European Electronic Communications Code* (2018).
- Support the preparation of an evidence-based Air Quality Management Plan and continue to work proactively with the EPA to monitor and improve air quality in Fingal.
- Support the proactive management of noise by strengthening existing policies in relation to the strategic management, monitoring and mitigation of noise pollution and support the Noise Action Plan for the County of Fingal 2019-2023 and the Environmental Noise Action Plan for the Dublin Agglomeration 2018-23.
- Provide policies in the Draft Plan to address noise associated with Dublin Airport, in accordance with the Noise Action Plan for Dublin Airport (2019-23).
- Promote appropriate lighting installations designed to minimise light pollution / unwanted environmental effects while maximising the light reaching the public realm.

Other Issues:

- Prepare a Draft Development Plan that complies with the provisions set out under Section 10(2)(A) of the Planning and Development Act 2000 (as amended), including Section 28 Guidelines and consistent with the NPF, the RSES and associated MASP.

Environmental Assessment (including SEA, AA and SFRA):

- Prepare an updated Strategic Flood Risk Assessment (SFRA) for Fingal and continue to work with relevant authorities on the identification and development of additional flood protection measures where necessary, to strengthen existing policies in relation to SFRA.
- Ensure a sequential and precautionary approach to flood risk management in line with the requirements of the Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009).
- Ensure that the preparation of the Draft Development Plan is carried out in conjunction with the SEA, AA and SFRA processes in compliance with legislative requirements and section 28 Guidelines.
- In relation to Strategic Environmental Assessment, ensure the Draft Plan incorporates appropriate policies or objectives required to avoid or reduce significant effects on the environment identified in the assessment process.

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- In relation to Appropriate Assessment, any mitigation measures proposed to avoid impacts on Natura 2000 sites outlined in any NIR to be prepared as part of the forthcoming assessment process, will inform and guide policy of the Draft Plan.
- Develop a multi-disciplinary approach to the enhancement of existing policies and the inclusion of new policies in relation to the SFRA.