

COUNCILLOR
TONY MURPHY



INDEPENDENT

Senior Executive Officer,
Planning & Strategic Infrastructure Department,
Fingal County Council,
County Hall,
Main Street,
Swords,
Co. Dublin.

5th February 2020

Comments on Variation No.2 of Fingal Development Plan 2017-2023 in response to the publication of the National Planning Framework and the Regional Spatial and Economic Strategy (RSES)

Dear Sirs,

It is welcomed that Fingal County Council have now proposed variation no.2 to the Development Plan in response to the publication of the new National Planning Framework (NPF) and the new Regional Spatial & Economic Strategy (RSES). Indeed as an elected representative, I have been calling for this review for six months now because of the dangers of proceeding with plans that may have complied with the now superseded National Spatial Strategy & RPG's but would not now comply with the new NPF & RSES. The example foremost in my mind would be the Castlelands Masterplan which is proposing to situate 1000 dwelling units on the periphery of Balbriggan which is now classed as a 'self-sustaining town' requiring catch up investment in employment and Infrastructure. The NPF & RSES no longer advocate continued 'urban sprawl' and that is why it is vital that the Development Plan is revised to align with the new National & Regional planning documents. The towns of Skerries, Rush & Lusk are also now classed as 'self-sustaining towns' and having all experienced population growth in recent years, it is important that the 'catch-up investment' is now made in employment & Infrastructure in these towns in the newly assigned Core Region of Fingal. All towns and villages in Fingal must develop in line with their position in the new settlement hierarchy of the RSES.

However, from an initial reading of this Variation No.2, I was surprised at how 'light' it was and expected more substance and more specific referencing, revised maps and new projected growth figures, to reflect the new approach to planning that is included as policy in the NPF & RSES. Some of the language used seems to downplay the significance of this variation and in places it seems that it is simply proposing to replace the title of the Old National & Regional Planning Documents

COUNCILLOR TONY MURPHY



INDEPENDENT

(NSSRPG's) with the titles of the new National & Regional Planning documents (NPF & RSES) and to do nothing else. This variation appears in the first instance to be just an exercise in updating references, I do not feel it is a variation that takes the essence of the new planning approach endorsed by the NPF & RSES and I do not feel the Fingal Development Plan will be fully aligned with the RSES if the variation is approved in its current format. This variation is akin to changing the label on the tin but keeping the contents of the tin the same.

I am also slightly confused as there seems to be conflicting information within the proposed variation. The tables on pages 27 & page 32 show different projected growth figures. The table on page 27 is identical to the current Development Plan. The table on page 32 shows slightly reduced figures for all towns, including Swords which is surprising, as Swords is now a key town in the RSES. I can only assume the slightly reduced figures in the table on page 32 is a reflection of the houses built since the original development plan was made. If this is the case, then there is no change in approach by Fingal County Council as to where future populations should be based. I would urge the Planning Department to re-look at these figures and to change the projected growth figures for each individual town to align with the towns new position in the Settlement Hierarchy of the RSES. We cannot have a development plan with two different tables showing different growth projections, especially when neither table is reflective of the new approach in the NPF & RSES.

May I also refer to the following paragraph on page 2 of the proposed variation which concerns me :-

"It should be noted that this Variation is proposed within the context of the commencement of the upcoming review of the Fingal Development Plan (which will commence formally in March 2021). The Development Plan review in 2021 will address the longer term objectives and policies of both the NPF and the RSES within a wider review process and only these elements which are considered immediately necessary or legally required are proposed at this stage."

The alignment of the NPF & RSES with Development Plans is not a choice of a Local Authority, it is statutory obligation and my understanding is that there is nothing within the Planning & Development (Amendment) Act 2018 that gives a local Authority the facility to delay or push back implementation of some of the objectives of the NPF & RSES that it considers to be 'longer term' until it produces its new Development Plan in 2024. This paragraph is an admission that all aspects of the NPF & RSES have not been included in this variation no.2, and therefore an admission that the Development Plan will in fact not be fully aligned with the NPF & RSES until such time as the new Development plan

COUNCILLOR
TONY MURPHY



INDEPENDENT

process has commenced and is completed which is 4 years away. As 'long term' objectives of the NPF & RSES have been ignored or excluded from this Variation, it will therefore be necessary for Fingal County Council to make further Variations to the current Development Plan or to carry out a full review in order to for the Development plan to be rendered consistent with the NPF & RSES.

In summary, I welcome in principle this Variation, but it is only a small step in the right direction and many more steps need to be taken before our Development Plan speaks with the NPF & RSES.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Tony Murphy', written over a white background.

Cllr Tony Murphy