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Sent: 06 February 2020 17:15
To: Fingal Development Plan
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Subject: Variation no.2 to the Fingal Development Plan 2017-2023, Alignment of the Fingal Development Plan 2017-2023 with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES)

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Planning legislation provides good opportunity for the public to input into the development plan process, including any variations to development plans, through periods of statutory public consultation whereby members of the public may make submissions on the plan in question directly to the planning authority, as provided for under section 13(2) of the Planning and Development Act.

In regards to variation no.2 to the Fingal Development Plan 2017-2023, *Alignment of the Fingal Development Plan 2017-2023 with the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES)*.

The RSES is a statutory plan, and the proposed changes within the variation no.2, do not achieve alignment with the RSES nor NPF, as required under section 11 of the planning and development act 2018.

There is no reasonable basis to consider the variation aligns the FDP with the RSES & NPF, and I will comment on some of the obvious issues, and in particular with regard to core strategy because the approach to preparing core strategy in the FDP variation no.2 is flawed, and this is very important as it relates to section 10 of the planning and development act.

The first thing to consider is the origins of the Fingal Development Plan 2017-2023 and the preparation of core strategy within the development plan, which was prepared based on the 2006 census, and National Spatial Strategy 2000, and Regional Planning Guidelines. 2010. All of the aforementioned have been replaced with new versions 2016 census, National Planning Framework 2017 and Regional Spatial and Economic Strategies 2019. There have been major changes within the former and latter planning policy documents (National & Regional) and available statistical data. These factors inter alia form a reasonable basis to expect material changes to core strategy. Furthermore there's a new dimension in that development plans need to address the issue of climate change. In view of this, the manner in which Fingal County Council propose aligning the FDP to NPF & RSES is deeply concerning.

In summary, a "**mark up**" approach of; delete reference to NSS & RPG, and replace with NPF & RSES shows a complete irreverence to the major policy shift between NSS/RPG and NPF/RSES, and is totally inadequate in fulfilling the local authorities legislative obligations under the Act. The minor amendments allied with the "Mark -up" approach suggests that Fingal County Council feel they have produced an "**all weather**" development plan that simultaneously aligns with policy documents which claim to be radically different (NSS and NPF).

Logically it is impossible for a development plan which pre-dates the production of the NPF and RSES and was based on completely different policies (NSS & RPG's), so the premise that the development plan somehow complies with the opposing policy objectives of the former and latter national and regional policies is absurd, and is an indicator of hostility & inertia towards implementing the new policy. Let us not forget the seriousness of the Mahon Tribunal Report and the legacy of bad planning when considering this blatant disregard.

This is not an exhaustive list, it is simply provided to make the point, that at best the approach to the variation is a tick the box exercise and cannot be reasonably described as aligning the development plan to RSES & NPF.

Fingal Development Plan 2017-2023 does not contain any analysis nor does it distinguish the difference between infill/brown-field development and green-field development therefore it cannot logically be relied upon to meet NPF & RSES objectives of compact growth.

1. In summation the variation has only proposed re-labelling settlements within the core strategy, and the core strategy remains materially unchanged.
2. The allocation of people and population growth targets within these settlements has not changed at all.
3. To achieve compact growth; One of the fundamental objectives of the NPF & RSES is for 50% of development to take place in infill and brown-field sites in Dublin Metropolitan area, and 30% of development in infill and brown-field sites within the Hinterland area (**policy**

objectives 3a -3c). As presented the core strategy of FDP cannot logically be relied upon to provide direction and guidance to achieve these objectives because FCC has not distinguished between green-field and infill/brown-field zoned land.

4. Notably the core strategy presents a table of zoned land and number of units as a proxy of population growth targets. The table should be amended to clearly state the estimated population growth.

5. The quantum of zoned land suggests >125,000 increase in population which is far in excess of population targets. No justification has been provided for this surplus capacity and how this will be managed.

6. Given there is surplus land capacity, it is unclear if any land prioritisation measures and/or downzoning/dezoning measures have been considered in certain areas facilitate compact growth objectives.

7. There appears to be anomaly's in the gross dwellings per hectare (**dpha**) amongst the tiers of the settlement hierarchy; for example Rush which is self sustaining town in the core area (hinterland within RSES) has 51.5 ha zoned land, translating to 1771 units, equating to 34dpha, whereas Malahide which is a higher order settlement category of a self sustaining **growth** town within **Metropolitan area** has 75.5 ha zoned land translating to 956 units, equating to 12dpha. The density in this example is contrary to their respective positions with regard to settlement hierarchy and location within Dublin Masp. The inconsistencies of density within the core strategy repeat throughout the tiers.

8. To comply with the compact growth objective it is expected that Dublin City and Suburbs and Metropolitan area would carry density >50dpha however this does not appear to be the case in calculating residential capacity within the FDP core strategy. This is serious flaw within the core strategy because if the residential capacity is underrepresented therefore capacity for population growth is under reported.

9. The formula to calculate residential capacity firstly should be stated, and secondly; to give an accurate and true reflection of allocation of population growth the metrics should be representative of the policy guidelines on density with regard to the settlements location i.e. higher order settlements carrying a higher density and a graded reduction in density down through the settlement tiers.

10. The amount of undeveloped zoned land in Balbriggan has a residential capacity of 3805 units, this equates to a population of circa 12,000 and this equates to a proposed 60% increase in population. This potential population growth is far in excess of targeted national growth rate and is therefore the type of runaway growth the NPF & RSES intends to curtail, and is therefore contrary to the relevant NPO and RPO.

11. In general the FDP variation makes no attempt to mention of how NPO's or RPO's have been incorporated into the FDP, and the reason for this is they haven't been incorporated.

12. The origins of the past and present Fingal Development Plans have been focused on green-field led model for growth. There has been a major policy shift towards compact growth and greater focus on infill/brown-field development and the Fingal Development Plan has not been sufficiently changed to achieve the new policy objectives. The development strategy for each settlement should be updated to reflect this objective.

Essentially what Fingal County Council are proposing is minimum partial-alignment, which in effect carry's no material change so the council can continue on business as usual until the development plan expiry date in 2023. This is disrespectful to the state bodies that authored the policy, the Oireachtas that passed the legislation and the citizens of Fingal who need to put up with the consequences of bad planning.

I assert that the magnitude of change required to the FDP requires that the review of the development plan ought to be brought forward to an earlier date to complete the work properly. Simply put waiting until 2023 is an unacceptable delay in implementing policy that issued in 2017 in the form of the NPF, and 2019 with regard to RSES. Citizens of Fingal deserve benefit of 2019 planning policies shaping development of the county rather than a document (National Spatial Strategy 2000) produced in the Celtic Tiger era of loose regulations and questionable planning and development practices that culminated in the Mahon Tribunal findings.

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Seamus Breathnach
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