

Senior Executive Officer,
Planning and Strategic Infrastructure Department,
Fingal County Council,
County Hall,
Main St.,
Swords,
Co. Dublin,
K67X8Y2.

Thursday 6th February 2020

Re: Variation No. 2 to the Fingal County Development Plan 2017-2023

Dear Sir/Madam

Tetrarch Capital Limited ¹ (referred to as the Client throughout unless otherwise specified) have retained Tom Phillips + Associates, town planning consultants², to make this submission to Variation 2 of the Fingal County Development Plan 2017-2023. Our Client is the owner of lands at Howth Castle, Howth, Co. Dublin.

The overall landholding comprises Howth Castle and its attendant buildings and Deer Park Hotel and Golf Course (hotel is currently not in operation). The landholding extends to c. 170 hectares and is in private ownership. The lands are accessed off the Howth Road (R105) to the north of the site. This landholding is underutilised in its current form and is appropriate for future development proposals, which will also ensure the maintenance and re-use of the historic castle and attendant grounds. The existing hotel building on site has been empty for a number of years and will be required to be replaced. The castle building requires significant investment to provide for the maintenance of the castle and ensure its ongoing use. The landholding adjoins the Howth DART Station which provides for high quality public transport infrastructure to the area and it is considered that the site is located strategically in the vicinity of this infrastructure to make optimal use of the landholding.

The majority of lands at Howth Castle are subject to zoning objective HA – High Amenity which seeks to protect and enhance high amenity areas. In the main, the lands provide for golf courses which over time have diminished in use. Whilst it is envisaged by the Client that a Championship Golf Course will be developed within this landholding, there are large areas of land which adjoining existing residential areas within Howth and Sutton which would be much better suited to alternative types of development. Part of the Howth Castle lands are also located within the boundary of the Howth Urban Centre Strategy (Howth Road Character Area) which defines the current ‘development boundary’ for Howth.

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² Tom Phillips + Associates, 80 Harcourt Street, Dublin 2





Views from within Howth Castle land along Eastern Boundary – Underutilised lands which are readily available for future development

Proposed Variation 2 of the Fingal Development Plan 2017-2023 (FDP) was published by Fingal County Council (FCC) on 10th January 2020 to vary the plan to update its core strategy in response to the publication of the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES). Having reviewed the Variation it is our considered opinion that:

- The FDP Variation does not properly incorporate the population and housing forecasts outlined in the NPF and RSES,
- FCC has made fundamental errors in coming to conclusions on the capacity of lands in Fingal to accommodate future growth, and
- The FDP Variation does not allow for sufficient zoned lands to accommodate the population targets outlined in the RSES.

Table 6.2 of the Variation outlines the NPF / RSES Population Targets for Dublin and Fingal, as below.

Fingal County Council	CENSUS 2016	2026 Range		2031 Range	
		Low	High	Low	High
Dublin NPF Road Map	1,347,500	1,489,000	1,517,500	1,549,500	1,590,000
RSES Fingal Allocation	296,000	327,000	333,000	340,000	349,000
RSES Adjusted Transitional Population Projections for MASP		327,000	333,000	340,000	364,000
Source: NPF/RSES and CSO Census					

The RSES indicates a population target for Fingal of 333,333 (high range figure) by 2026. The FDP estimated a population target of 312,908 persons for Fingal up to 2023, which is c. 21,000 below that outlined in Table 6.2 of the Variation. FCC have provided the following interpretation of the population targets in the Variation to try and adjust the figures accordingly – i.e. make up the shortfall from the published Development Plan.

“The 2026 high range population target of 333,000 persons provides for a population growth per annum of 3,378.6 persons per year. Extrapolating this figure to the year 2023 provides for a population projection of 319,864 persons³. Dividing this figure by the projected household size in 2023 which is 2.683 persons provides for an overall housing unit requirement of 119,352 units or a growth of 14,501 units to the end of the Fingal Development Plan in 2023.”

It is outlined above that the RSES provides for a growth of 3,378 persons per year in Fingal to 2026 and FCC have provided an annualised growth rate to provide for 14,501 housing units to serve the population growth to the end of 2023. It is important to note that FCC use a base population of 296,214 persons from Census 2016 – the figure used should in fact be 296,020 persons⁴. Therefore, as the base is wrong, all subsequent calculations based on this are incorrect. More importantly, the Variation also does not provide for the allowable 25% growth headroom up to 2026 from the NPF, therefore the high range population target for the County could be increased to 342,250 persons for 2026.

There is a significant flaw in how FCC assess targeted housing units – to consider 14,501 units as ‘permitted units’ rather than completed units. The assessment does not have any regard to completed

³3,378.6 (growth per annum) x 7 (7 years to 2023) = 23,650 + 296,214 (current pop)

⁴It is assumed that FCC are using an Interim Census Figure of 296,214 and not the finalised published 296,020

units or the requirement that 14,501 units should be delivered by 2023, not simply processed through the planning system. This is a fatal flaw in the assessment.

Furthermore, the Variation goes on to discount extant permissions in Fingal from the overall target:

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

Firstly, there is no rationale or evidence provided (text or mapping) which highlights where this 5,582 units comes from, if it solely relates to permission on residential zoned lands or to the actual location of the sites to which area these figures relate. It should clearly be illustrated in the Variation how these have been calculated and the area they relate to (this is particularly relevant to Howth which will be discussed further below).

To discount 5,582 units which have been granted from the overall target is not appropriate. This assumes that there is a 100% conversion rate from granted permissions to completed units and that these units will also be delivered by 2023. Even from a cursory comparison with recently published statistics, the link between extant permissions and completions / commencements in Fingal illustrates a significant lag in delivery of units between the grant of permission and delivery of the unit.

Fingal Co.	DHTF Units with Planning Permission (Tier 1)	DoHPLG BCMS Commencements (all units/12mo prior)	Completed CSO 12 month period (all units)
Q1.2019	14989	2599	2078
Q1.2018	17522	2082	1945
Q1.2017	16237	1721	1247
Q1.2016	15757	1950	1128
Q1.2015	n/a	n/a	584

For example, the Dublin Housing Task Force (DHTF) highlights that in Q1 2018, there were 17,522 units with planning permission in the FCC area (again this does not tally with FCC’s own figure of 5,582 units) and by Q1 2019 the Department of Housing, Planning and Local Government confirmed that 2,599 units have commenced development and the Central Statistics Office (CSO) noted that 2,078 units had been completed. Even combining commencement / completion of units this would represent c. 26% of the available permissions in Fingal, and c. 11.9% of units completed. It is clear therefore that extant permissions for residential development should not be discounted from the overall housing target for Fingal. Given the seemingly low (or time delayed) conversion rate from grant of planning permission to delivery of residential units it is also considered that the quantum of residential zoned lands in the County is not sufficient to provide for the population targets set out in the RSES. In this regard, Howth Castle comprises a significant land-bank within the County which could help to deliver the required landbank of zoned lands to deliver the RSES population targets.

The Variation also updates Table 2.6 and 2.8 of the FDP which relates to the Remaining Zoned Residential Capacity in Fingal from the start of the Development Plan period and as updated in September 2019, to support the Variation. Focussing on Howth as an example, it is illustrated in the extracts of the relevant tables below that the Variation concludes there is no requirement for any additional residential zoned lands in the Howth / Sutton area to fulfil population targets outlined. In



fact, for Howth it identifies that there has been a reduction of 2 hectares of lands to provide for residential development (from publication of FDP 2017-2023 to publication of Variation 2).

Town/Village	Remaining Land Supply (hectares)	Remaining Capacity Residential Units	Metropolitan-Hinterland % Land	Metropolitan-Hinterland % Units
Howth	16	498		
Baldoyle/Sutton	29	1498		

Extract from Table 2.6 of the FDP 2017-2023

Town/Village	Remaining Capacity (hectares)	Remaining Residential Units	Metropolitan-Core % Land	Metropolitan-Core % Units
Howth	14	436		
Baldoyle/Sutton	29	1498		

Extract from Table 2.8 of Variation 2 to the FDP 2017-2023

It should be noted that the above capacity calculations for Howth appear to exclude extant permissions relating to the development of the Techrete site on Howth Road and the Baily Court Hotel Site at Balcadden, Howth. There are currently 2 No. Strategic Housing Development applications lodged to An Bord Pleanála on both of these sites which provide for a total of 689 No. residential units (512 No. at Techrete and 177 No. at Baily Court). Notwithstanding the extant permissions (at the time of the calculation of the available residential permissions in the Variation – September 2019), permission for this quantum of development would significantly exceed the identified remaining capacity in the Howth area by c. 38%. It is also noted that the majority of the Techrete and Baily Court sites are zoned as ‘Town Centre’ and seem to be excluded from the remaining land supply calculations which is not appropriate. FCC need to provide a rationale and explanatory note as to how extant permissions have been calculated and a map their locations – none of this has been provided as part of the Variation.

Furthermore, in accordance with National and Regional guidance, higher density development should be concentrated at locations which have good quality transport infrastructure. Howth is ideal in this regard as it has a DART station. As indicated in Table 2.8 above, residential densities are calculated for the Core Strategy at the average of c. 31 units per hectare. The Sustainable Residential Development in Urban Areas Guidelines, May 2009, in Section 5.8 states that;

‘In general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes.’

In our opinion, FCC are substantially under-providing for the required density on residential sites within the Howth area.



Conclusion

Having regard to the above, it is clear that Fingal County Council need to reassess how they have interpreted the guidance established from the National Planning Framework and Regional Spatial and Economic Strategy and how population growth has been distributed throughout the County. In summary:

- The population targets outlined in the Development Plan and Variation 2 use the wrong Census 2016 figure as a base.
- The Variation does not allow for additional headroom over and above the 2026 RSES population targets which is allowable under the NPF.
- The Variation discounts 5,582 units from the housing targets on the basis that these are permitted residential units. It is clear therefore that FCC are calculating their targets on 'units granted' rather than 'units completed' to accommodate population growth which is not sustainable. Targets should be based on completed units.
- There is a lack of residential zoned lands within the Howth area.
- There are current applications for Strategic Housing Development within Howth.
- The identified residential zoned land in Howth provides for an average density of 31 units per hectare which is significantly below national guidance on density in locations which are proximate to high quality public transport infrastructure.

The landholding of our Client at Howth Castle extends to c. 170 hectares and is ideally located to facilitate development in Howth. It is significantly underutilised at present and has a number of buildings (hotel and castle) that are in need to maintenance and repair. Our Client is progressing with the preparation of a Masterplan for the landholding and has identified that residential development can be delivered in tandem with associated mixed use (recreational and tourism) development of the lands. Our Client has identified that c. 15 hectares of the lands are readily available to be zoned for residential development to the east of the landholding, adjoining the Grace O'Malley housing estate. It is envisaged that the development of these lands can provide for a mix of housing, with a particular emphasis on housing for down-sizers, right-sizers and retirees. There is an opportunity under the current Variation process to zone the required lands for residential development and update the capacity and population figures for Howth to reflect this.

Should you require any further information in relation to this submission please do not hesitate to contact me.

Yours Sincerely

Stephen Barrett
Associate
Tom Phillips & Associates



View of Golf Course within Howth Castle lands



View from within Howth Castle lands towards Irelands Eye (which also forms part of the property)



View of Hotel at the south of Howth Castle lands which has been empty for a number of years and needs to be redeveloped to ensure that a viable hotel can operate at this location



Howth Castle