

Senior Executive Officer,
Planning & Strategic Infrastructure Department,
Fingal County Council,
County Hall,
Swords,
Co. Dublin
K67 X8Y2.

7 February 2020

Re: Proposed Variation No. 2 to Fingal Development Plan 2017-2023
Submission on behalf of Cannon Kirk Ltd., 20B Beckett Way Park West Business Park,
Dublin 12

Dear Sir/Madam

This submission is made on behalf of Cannon Kirk Ltd. in response to Fingal County Council's Notice of a proposal to make a Variation the Fingal Development Plan 2017 – 2023 to incorporate the provisions of the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES) for the EMRA region.

Cannon Kirk Ltd. supports Proposed Variation No. 2, and welcomes the designation of Donabate as a Self-Sustaining Growth Town. Having regard to the relevant provisions of the NPF and the RSES expressly identifying Donabate as a Strategic Development Area within the North-South Strategic Development Corridor, the designation as a Self-Sustaining Growth Town in the settlement hierarchy, and related housing allocation, are appropriately aligned with the NPF and RSES.

To further support the sustainable development of Donabate it is requested that the following amendment is made to the Draft Variation:

Proposed Amendment No. 1: That Section 4.2 'Dublin Metropolitan Area' of the Proposed Variation is amended as follows:

Donabate is identified as a Self-Sustaining Growth Town within the Metropolitan Area in the RSES. It is also identified on the North – South Strategic Corridor (DART expansion). The DART Expansion Programme, to be delivered by 2027 will increase capacity on the northern commuter line and support ongoing urban expansion of Donabate. **There is significant and ongoing investment in public infrastructure to support the planned expansion and consolidation of the town, including the Donabate Distributor Road, upgrades in wastewater services, a new pedestrian and cyclist bridge over the Dublin-Belfast Railway line, and the Broadmeadow Way Greenway between Malahide Demesne and Newbridge Demesne.** The Donabate Peninsula enjoys many natural areas including the Rogerstown and Malahide Estuaries, European Sites which form part of the Natura 2000 network. In addition, there is Newbridge

Demesne and The Square ACA. While Donabate has experienced substantial housing development in recent years, there remains extensive areas of undeveloped residential zoned lands within the settlement boundary of the town. The Development Plan will support the delivery of residential development on these undeveloped serviced lands at sustainable residential densities to capitalise on the return on public investment in infrastructure and the town's strategic location on the North -South Strategic Corridor.

[Deletions in ~~strike~~through and additions in red text.]

1.0 Donabate: Self Sustaining Growth Town

Cannon Kirk Ltd. fully supports Proposed Variation No. 2 to the Fingal County Development Plan 2017-2023. The proposed Variation designates Donabate as a 'Self Sustaining Growth Town', which is defined in the RSES as follows:

"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 is at the same level in the settlement hierarchy for the region as the strategic development towns of Leixlip, Greystones and Dunboyne. The planned development of Donabate forms part of the 'Vision' for the Region as under Section 5.3 of the RSES, which focusses on the consolidation of Dublin City and suburbs and the sequential development of the Metropolitan area. Donabate forms part of the designated North-South Corridor in the RSES, and it is stated that there is *"significant residential capacity in this strategically located rapidly growing coastal village"*.

Given the status of Donabate in the planned regional growth of the Dublin Metropolitan area, it is considered appropriate that the town is designated as a Self-Sustaining Growth Town in the Fingal County Development Plan as proposed in Proposed Variation No. 2.

2.0 Suggested Amendment to Section 4.2 'Dublin Metropolitan Area'

Proposed Variation No. 2 includes proposed amendments to Section 4.2 of the Development Plan, including references to the development of Donabate. With reference to the spatial development objectives of the RSES it is requested that these proposed variations are amended to include references to ongoing, approved and proposed infrastructural upgrades and the delivery of residential development in the town. The planning rationale for the inclusion of the amendments are addressed in turn below:

2.1 *The DART Expansion Programme, to be delivered by 2027 will increase capacity on the northern commuter line and support ongoing urban expansion of Donabate. There is significant and ongoing investment in public infrastructure to support the planned expansion and consolidation of the town, including the Donabate Distributor Road, upgrades in wastewater services, a new pedestrian and cyclist bridge over the Dublin-Belfast Railway line, and the Broadmeadow Way Greenway between Malahide Demesne and Newbridge Demesne.*

Proposed Variation No. 2 references the proposed DART expansion programme and its role in the ongoing growth of Donabate. Section 5.4 Metropolitan Area Strategy of the RSES states that the DART expansion programme will be delivered by 2027 and will "... increase capacity on the northern commuter line and support ongoing large-scale urban expansion of the North Fringe lands and Donabate".

Table 5.1 'Strategic Development Areas and Corridors, Capacity Infrastructure and Phasing' of the RSES goes on to list short term phasing/enabling infrastructure works for Donabate that comprise DART expansion, distributor road and railway bridge, social infrastructure, local area water network and storage upgrades. In recent years the Council has provided substantial infrastructural upgrades in Donabate including the Donabate Distributor Road, the recently approved pedestrian and cyclist bridge over the Dublin-Belfast Railway line, the recently approved municipal pumping station in Corballis East (described under Reg. Ref. F19A/0472), and the ongoing application for the Broadmeadow Way Greenway. Significant upgrades by Irish Water have also been completed in the area and the Department of Education and Skills have stated that the 24-Classroom primary school will be delivered in the town under the school building programme. These existing and ongoing infrastructural projects will benefit the residents and businesses in Donabate and will facilitate and support the residential and commercial growth of the town in accordance with the RSES. Given the scope of these infrastructural projects it is considered appropriate that they are directly referenced to in the Development Plan, as proposed.

2.2 *While Donabate has experienced substantial housing development in recent years, there remains extensive areas of undeveloped residential zoned lands within the settlement boundary of the town. The Development Plan will support the delivery of residential development on these undeveloped serviced lands at sustainable residential densities to capitalise on the return on public investment in infrastructure and the town's strategic location on the North-South Strategic Corridor.*

Both the NPF and the RSES provide for significant population growth in the Region and the Dublin Metropolitan Area, and identify Donabate as a town with capacity to accommodate growth given its strategic location and investment in infrastructure capacity. The availability of infrastructural services is an important factor with regard to the delivery of a quantum of new housing and the population growth that Donabate can absorb. The strategic development areas identified in the Dublin Metropolitan Area, including Donabate are located along key transport corridors and include a number of major sites that have the capacity for significant residential development.

National Policy Objective 1b of the NPF sets an ambitious population target of 2.85 million by 2040 in the Eastern and Midland Region. Section 6.6 of the NPF states that an average output of at least 25,000 units per annum up to 2040 will need to be provided nationally to reach population targets and to meet the need for affordable and well-located housing. Due to underlying deficits in housing provision nationally since 2010, the NPF goes on to state that on average 30,000 to 35,000 new homes should be provided nationally per annum up to 2027.

The NPF includes National Policy Objectives (NPOs) to guide where these new homes should be provided. NPO 3a sets a development target that at least 40% of all new homes are delivered within

the built-up framework of existing settlements and NPO 33 seeks to prioritise the provision of new homes in locations that can support sustainable development at an appropriate scale. In respect of urban developments, NPO 11 states that there is a presumption in favour of development that will encourage and generate activity in existing cities, town and villages.

The RSES builds upon the spatial objectives of the NPF and through Regional Policy Objective (RPO) 3.2 states that at least 50% of all new homes should be built within or contiguous to the built-up area of Dublin city and suburbs. To facilitate compact urban growth, it is stated in Objective RPO 5.4 that strategic residential development areas within the Dublin Metropolitan Area will accommodate higher densities and qualitative standards in accordance with National Guidance.

As a Self-Sustaining Growth Town and strategic development area it is considered appropriate that residential development in Donabate is provided in a compact and sustainable manner, as described in the NPF and the RSES. It is requested that Section 4.2 of the Proposed Variation is amended to refer to the provision of sustainable residential densities on zoned and undeveloped lands in Donabate to integrate these spatial principles into the Development Plan.

3.0 Conclusion

This submission on behalf of Cannon Kirk Ltd. supports Proposed Variation No. 2 to Fingal Development Plan 2017-2023. Proposed Variation No. 2 appropriately integrates the provisions of the NPF and the RSES into the Fingal Plan and identifies Donabate as a Self-Sustaining Growth Town within the Dublin Metropolitan Area. This submission supports the Proposed Variation and proposes that the making of the Variation has regard to the following:

- Donabate is designated in the RSES as a strategic development area within the North-South Corridor of the Dublin Metropolitan Area, with significant capacity to accommodate sustainable urban expansion. Given the context of the town and its status in the RSES it is considered appropriate that Donabate retains its designation as a Self-Sustaining Growth town in the Fingal Development Plan 2017-2023.
- Support for early delivery of Phase 2 and 3 lands as per the Donabate LAP in order to reinforce the designation of Donabate as a Self-Sustaining Growth Town and to allow the town to function and develop in accordance with its designation.
- The RSES refers to infrastructural requirements to enable development in Donabate, which include the DART Extension, water and waste water services, the Distributor Road, and Railway Bridge. It is proposed that the Proposed Variation is amended to reflect the significant investment made in the wider infrastructure in Donabate and the opportunity to capitalise on significant public investment to enable the plan-led sustainable expansion of the urban area.
- The NPF and the RSES incorporate policies and objectives to facilitate compact and sustainable development within the existing urban framework of towns and cities. The RSES seeks to accommodate higher residential densities within the Dublin Metropolitan areas, in accordance with national guidance. It is requested that Section 4.2 of Proposed Variation No. 2 is amended to refer to the provision of residential development at sustainable densities on undeveloped zoned lands

within the boundary of Donabate to further align the Development Plan with the NPF and the RSES.

I trust that the Council will afford due regard to the points and issues raised in this submission,

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Declan Brassil', with a stylized flourish at the end.

Declan Brassil

Declan Brassil & Co.