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

A Chara,

McCutcheon Halley Planning of Kreston House, Arran Court, Arran Quay, Dublin 7, wish to make a submission on proposed Variation No. 2 to the Fingal Development Plan 2017-2023, on behalf of our Client, Glenveagh Properties PLC of 15 Merrion Square North, Dublin 2, in respect of their landholdings in Howth.

Our Client's lands in Howth encompass a c.1.75 hectare site to the north of Howth Castle and form part of the Deer Park Golf Club lands to the south. It is located to the south of the R105, Howth Road, and is approximately 1km west of Howth village and 1.8kms east of Sutton Cross, see **Figure 1**. Located c.350m from Howth DART station, the site benefits from access to high capacity public transport, with additional high frequency urban bus services also available.

There are two zonings affecting the site, the northern part of the site is zoned 'RS' – Residential with an objective to *"provide for residential development and protect and improve residential amenity"*.

The southern portion of the site is zoned HA – High amenity. The purpose of the HA Zoning Objective is to *"protect and enhance high amenity areas"*.

We note the review process has been undertaken to ensure the County Development Plan is consistent with the recently published *Project Ireland 2040 - National Planning Framework (NPF)* and the *Eastern and Midlands Regional Spatial Economic Strategy (RSES)*.

Under Section 9(6) of the Planning and Development Act 2000 (as amended), the Fingal Development Plan is required to align with the current national and regional planning policy framework. Accordingly, proposed Variation No. 2 seeks to amend the Core Strategy of the County Development Plan to reflect the Settlement Strategy contained within the RSES, which in turn, is underpinned by population projections included in the NPF Implementation Roadmap.


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Figure 1 Our Client's Landholdings, Howth

The RSES recognises the importance of Dublin as a global gateway and Section 5.3 identifies guiding principles for the Dublin metropolitan area including;

- *Compact sustainable growth and accelerated housing delivery – To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target of 50% of all new homes within or contiguous to the built-up area of Dublin City and suburbs, and at least 30% in other settlements. To support a steady supply of sites and to accelerate housing supply, in order to achieve higher densities in urban built up areas, supported by improved services and public transport.*
- *Integrated Transport and Land use – To focus growth along existing and proposed high quality public transport corridors and nodes on the expanding public transport network and to support the delivery and integration of 'BusConnects', DART expansion and LUAS extension programmes, and Metro Link, while maintaining the capacity and safety of strategic transport networks.*

Thus, the Settlement Strategy for the Dublin metropolitan area is underpinned by the aim to deliver sustainable population and housing growth through densification and consolidation, focussing on high quality public transport corridors.

Howth is included within the bounds of the Dublin metropolitan area and Appendix B of the RSES identifies population targets for the Dublin Strategic Planning Area (SPA) which encompass Fingal County, see **Figure 2**. It is noted that the growth targets contained within the RSES significantly exceed those set out in the superseded RPG's. In this regard, the RSES targets to 2026 and 2031 for Fingal are indicated in **Table 1** below.

Local Authority	Census 2016	2026 (Low)	2026 (High)	2031 (Low)	2031 (high)
Fingal	296,000	327,000	333,000	340,000	349,000

Table 1 NPF and RSES Population Targets for Fingal



Figure 2 Boundary of Metropolitan Area Strategic Plan (MASP) showing Howth within 'Dublin City & Suburbs'

Whilst the RPG's identified a population target for 2023 of 312,908 for Fingal, the current regional strategy indicates a target up to 333,000, being an increase of 20,092 persons (albeit over an additional 3-year period to 2026). Section 2.5 of proposed Variation No. 2 incorporates the updated targets, extrapolating the population projections and subsequent housing allocation over the life of the development plan to 2023. However, analysis of the proposed amendments to the County Development Plan reveal that the new population targets for Fingal have been applied very conservatively.

Having regard to the updated population targets, it is considered that Table 2.8 in proposed Variation No. 2 should contain adjusted figures for the 'Remaining Capacity Residential Units' which address the objectives of increased density, consolidation and compact growth contained in the national and regional planning policy framework. Despite being located within the metropolitan area, proposed Variation No. 2 has not made provision for any of the additional population growth identified in the NPF to be accommodated in Howth.

Although the Core Strategy is proposed to be varied to incorporate the RSES population targets, it is noted that these figures are not reflected in Table 2.8 which sets out the housing capacity of existing zoned lands, including Howth. **Table 2** below highlights the amended figures for Howth which reflect a decrease of 2 hectares of land supply since adoption of the County Development Plan in 2017 and a corresponding reduction in the remaining capacity, arising from lands which have been developed in the interim.

Town/Village	Remaining Land Supply (ha)		Remaining Capacity Residential Units	
	2017 (FDP)	2020 (Var. No.2)	2017 (FDP)	2020 (Var. No.2)
Swords	514	481	15,828	14,799
Blanchardstown	329	260	11,757	9,306
Portmarnock	57	43	1,490	1,116
Howth	16	14	498	436
Baldoyle/Sutton	29	29	1,498	1,498
Donabate	116	101	4,056	3,532
Malahide	88	75.5	1,114	956
Balbriggan	153	134	4,332	3,805
Rush	58	51.5	1,994	1,771
Lusk	45	38	1,218	1,020
Skerries	43.5	32.7	1,175	883
Other Settlements/Towns	288.5	259.5	4,581	3,982
Total Fingal	1,737	1,519	49,541	43,104

Table 2 Land Supply & Residential Capacity Figures in FDP 2017-2023 & Proposed Variation No. 2 (Source: Table 2.8)

It is also evident from the comparison in Table 2 above, that land supply has diminished in the period since 2017 and the remaining capacity has been reduced accordingly, indicating a threshold that would achieve an average density of c.28 units per hectare (uph). In the case of Howth, located within the Dublin metropolitan area and in close proximity to high capacity public transport, the density achieved would be 31 uph.

As indicated in Section 2.7, the amended settlement strategy has been devised to reflect “an overarching hierarchy of settlement centres.” However, it is apparent that there will be continued reliance on existing policy to direct future development and growth in the County, with no attempt to translate the upward population projections into additional density in the urban and metropolitan area. Thus, a concerted policy approach is required to achieve the more ambitious targets set out under the current national and regional planning policy framework to ensure additional housing output to meet demand.

The delivery of additional housing output continues to be a fundamental priority for the Irish Government, being the impetus for *Rebuilding Ireland - Action Plan for Housing and Homelessness* (2016). *Rebuilding Ireland* seeks to tackle current deficiencies in the housing sector by addressing homelessness, accelerating social housing, building more homes, improving the rental sector and utilising existing housing. Since 2016, successive policies including the NPF, RSES and Section 28 ministerial guidelines have been published to implement the programme, reflecting the Government’s commitment to end the housing shortage and to tackle homelessness.

Construction of new housing stock is a fundamental aim of Rebuilding Ireland *Pillar 3 – Build More Homes*. It's key objective is to increase the output of private housing to meet demand at affordable prices by doubling delivery of new homes to over 25,000 units per annum between 2017-2021. Aligned with this target, the NPF states that between 2018 and 2040, an average annual output of at least 25,000 new homes will be needed nationally. However, due to the recent undersupply of housing, annual housing output will need to increase to 30,000 to 35,000 homes per annum in the years to 2027 to meet projected population and economic growth and respond to increased household formation. To date, these targets are not being realised and will require a concerted effort on the part of planning authorities to respond to this chronic undersupply.

Active land management has been identified at both national and regional level as critical to the delivery of additional housing output. In order to increase supply in a sustainable manner, Section 2.6 of the NPF requires focus on four key areas, and includes:

“Making the continuous regeneration and development of existing built up areas as attractive and as viable as greenfield development. This requires greater certainty and cost equalisation as a result of a steady supply of sites and land and investment in infrastructure and amenities through more active land management in urban areas” (emp. added).

The RSES aims to ensure the ambitious growth targets set out in the NPF are achieved. The strategy states that *“Achieving this target will require active land management responses to ensure that land and building resources within existing settlements are used to their full potential.”*

In updating their core strategies to take account of the development parameters contained in the NPF, Section 4.3 of the RSES directs local authorities to undertake ‘proactive land management’ and states that *“the zoning of land and planning permission alone, do not necessarily guarantee delivery and population growth in accordance with projected, targeted timeframes.”*

It is our view that the requirement for local authorities to engage in a process of active land management, has not been fully addressed in the preparation of Variation No. 2. Review of the Fingal Development Plan 2011-2017 and 2017-2023, as well as Variation No. 2 reveal that there has been no change in the allocation of land or indicative capacity of zoned lands over the period, including within Howth.

In the period 2011 to 2017 when the two development plans were made, the land supply for Howth remained at 16 hectares demonstrating that over that time none of the available zoned land was developed. Since making the 2017 development plan, 2 hectares of land were subsequently developed and accordingly, Table 2.8 has now been adjusted in proposed Variation No. 2 to indicate a remaining land capacity of 14 hectares. However, no additional capacity for residential units has been allocated, despite recent national and regional policy developments that mandate higher growth targets and sustainability through increased housing delivery and compact growth.

The process of active land management requires consideration of the likelihood and capacity of owners to bring forth their sites for development, as well as prioritisation measures that ensure development accords with the relevant planning policy framework. In this instance, our Client owns a site which is primarily zoned (RS) for residential development. Having acquired their lands in Howth within the last year, our Client is already in the process of progressing a proposal for *Strategic Housing Development* at the site, including engaging in pre-planning consultation with Council regarding the scheme.

As an established developer, with a proven track record of delivering high quality and affordable homes, it is our view that our Client has already demonstrated their commitment to the provision of much needed housing on this site. It is considered that the requirement for active land management should support the development of such sites at a scale appropriate to meet housing need and ensure compact growth and sustainability

objectives are realised. In this regard, it is recommended that Table 2.8 contained within proposed Variation No. 2 should be amended to allow for greater density in Howth, in line with the relevant national policy guidance. Upward revision of the 'Remaining Residential Units' column as it relates to Howth, would facilitate the delivery of much needed housing at more appropriate densities through a mix of housing typologies including apartments. In addition, it would better denote the designation of Howth as a settlement within the Dublin metropolitan area.

It is our view that a prospective density of 31 uph in a strategically located settlement like Howth is contrary to the statutory national and regional planning policy framework. It is now national planning policy to consolidate urban centres and to promote compact growth.

National Policy Objective (NPO) 3a requires that 40% of all new homes nationally are to be delivered within the built-up footprint of existing settlements. To achieve this the NPF recognises that a significant and sustained increase in urban housing output and apartment type development in particular is required. It states;

“To more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need to build inwards and upwards, rather than outwards. This means that apartments will need to become a more prevalent form of housing, particularly in Ireland’s cities.”

NPO 35 seeks to increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, **infill development schemes**, area or site-based regeneration and **increased building heights**. (emp added).

This NPO is underpinned by recognition that; *“Historically, low-density housing development has been a feature of Ireland’s housing landscape in cities, towns, villages and the countryside. To avoid urban sprawl and the pressure that it puts on both the environment and infrastructure demands, increased residential densities are required in our urban areas.*

The *Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas* (2009) recommend that a minimum net density of 50 dwellings per hectare should be applied within public transport corridors, with the highest densities being located at rail stations/bus stops and decreasing with distances away from these nodes.

The available land supply identified for Howth in the County Development Plan, including our Client’s landholdings, is all located within close proximity of the DART station and bus stops. This suggests that at the time of preparing the Development Plan the appropriate density to apply was 50 uph as opposed to 31uph having regard to the 2009 Guidelines. This would yield 800 potential residential units. More recent national and regional policies promote even greater density at appropriate locations. Given the central and accessible location of Howth, including our Client’s lands, which benefits from the availability of high capacity public transport infrastructure, the most sustainable strategy for development is to maximise density.

Our Client’s site has the capacity to make a substantial contribution to the provision of new residential stock in an accessible location, well served by public transport and social infrastructure. It will allow greater choice in the area and assist the ageing population to vacate larger family homes while remaining within their community. As the housing stock increases, the cost of houses will stabilise and will afford those hitherto unable to buy properties in the area to enter the housing market.

The subject site meets the criteria of **Intermediate Urban Location** established in the *Design Standards for New Apartments* (2018). These are;

- Sites within or close to i.e. within reasonable walking distance (i.e. up to 10 minutes or 800-1,000m), of principal town or suburban centres or employment locations, that may include hospitals and third level institutions;
- Sites within walking distance (i.e. between 10-15 minutes or 1,000-1,500m) of high capacity urban public transport stops (such as DART, commuter rail or Luas) or within reasonable walking distance (i.e. between 5-10 minutes or up to 1,000m) of high frequency (i.e. min 10 minute peak hour frequency) urban bus services or where such services can be provided;
- Sites within easy walking distance (i.e. up to 5 minutes or 400-500m) of reasonably frequent (min 15-minute peak hour frequency) urban bus services.

The Guidelines advise that such locations are generally suitable for higher density development that may wholly comprise apartments.

It is further noted that the Fingal County Development Plan also explicitly supports high densities at appropriate locations. Objective PM41 aims to *“encourage increased densities at appropriate locations whilst ensuring that the quality of place, residential accommodation and amenities for either existing or future residents are not compromised”*.

It is our view that Howth meets the criteria of the Development Plan as an appropriate location for the promotion of higher densities. It is situated within the metropolitan area in close proximity to Howth Village and Sutton Cross which provide a range of amenities. The site is also well served by high capacity public transport and benefits from significant high amenity and recreational areas.

The subject site is located in the Howth Electoral District. A review of Census 2016 results highlights that the population increased by just 0.48% in the intercensal period. Put in context, the population of Fingal County increased by 8% in the same period, with the overall population across the four Dublin Local Authorities increasing by 5.3% and the State’s population increasing by 3.8%.

A review of the age profile for the Howth ED indicates that it has a rapidly ageing profile. Old age dependency is 42%, compared to 20.4% for the State, and Fingal with the lowest old dependency ratios of all counties at 13.8%.

The primary housing stock in the ED is houses/bungalows with just 12.5% apartments/flats.

It is clear from Census 2016 that the Howth ED requires a greater mix of housing types, sizes and tenures. Affordability and the range of housing stock available is contributing to the very low population increase in Howth.

Our review of Fingal Development Plan undertaken in preparation of this submission, has demonstrated that zoned land does not in itself deliver housing. Our Client is ready and committed to delivery of housing on their lands and should not be constrained by outdated and inappropriate density targets. The capacity of zoned lands located in Howth should be revised upwards to meet the additional housing output targets set out in *Rebuilding Ireland* (2016), as well as the increased population projections outlined in the NPF and RSES.

The purpose of proposed Variation No. 2 to the Fingal Development Plan 2017-2023, is to ensure alignment with the statutory national and regional planning policies. It is respectfully submitted that the proposed amendments to the Core Strategy do not adequately implement these policy developments with respect to population targets and residential unit allocations for Howth, in line with spatial planning requirements for the Dublin metropolitan area.

On behalf of our Client, we therefore request that proposed Variation No. 2 be amended, as follows:

- Section 2.6 of the Core Strategy regarding 'Housing Land Capacity' (Table 2.8) should provide for an additional allocation of residential units within Howth in recognition of its role within the Dublin metropolitan area and its location within Dublin City and Suburbs, as shown in the MASP (shown in Figure 2 above).
- Section 2.6 of the Core Strategy be updated in line with the new national and regional planning policies to promote higher densities in appropriate locations, including Howth, reflecting the need for a greater mix of housing typologies that may comprise a mix of houses and apartments.
- The Core Strategy should be amended to provide a greater focus on prioritisation measures and active land management, as required under the NPF and RSES, to take account of the capacity of some lands to deliver the additional housing output mandated by *Rebuilding Ireland* and required to be implemented under subsequent national, regional and local statutory policies.

We trust that our submission will be taken into account as part of the consultation process for the proposed variation (No. 2) to the County Development Plan. Our Client thanks you for the opportunity to engage with the Council in relation to these matters and trusts that due consideration will be given to the issues raised herein. Should you have any queries please do not hesitate to contact the undersigned.

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Jim Keogan

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