

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

7th, February 2020

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

Dear Sir/Madam,

Barina Property Group¹ has retained Tom Phillips + Associates, Town Planning Consultants², to make this submission to Proposed Variation 2 of the Fingal County Development Plan 2017 – 2023. Our client is the owner of lands at Barnhill, Clonsilla, Dublin 15.

Barina Property Group

Our client, Barina Property Group is a builder/developer of new homes and has been building new homes since 1975. Our client identified the Barnhill lands as a potential area for future housing many decades ago, since then our client has built several thousand new homes in the Greater Dublin Area including many new homes developments in the Fingal administrative area.

Our client is seeking to have the lands rezoned under the proposed Variation No.2 in order to provide for the delivery of much needed housing to meet the market demand. The sequential rezoning of lands and thus sequential delivery of housing requires long term planning for services and necessary infrastructure in this area.

Site Context

The lands are located to the east of Barnhill Road (R149), and are bounded to the North by the Navan to Dublin railway line and to the South by Clonee Road (L7005). The site includes a number of residential properties fronting to Clonee Road to the south. Four residential units are located on the eastern boundary of the site, with access off Barnhill Road. Lands to the east of Clonee Road form part of the Barnhill LAP 2019 lands, which was made by Fingal County Council in February 2019. The Hansfield SDZ is located to the north-west of the lands, to the north of the railway line. (See Figure 1)

The land is currently zoned GB – Greenbelt within the Fingal County development Plan 2017 – 2023 with the aim to “Protect and provide for a Greenbelt”. (See Figure 1 and 2)

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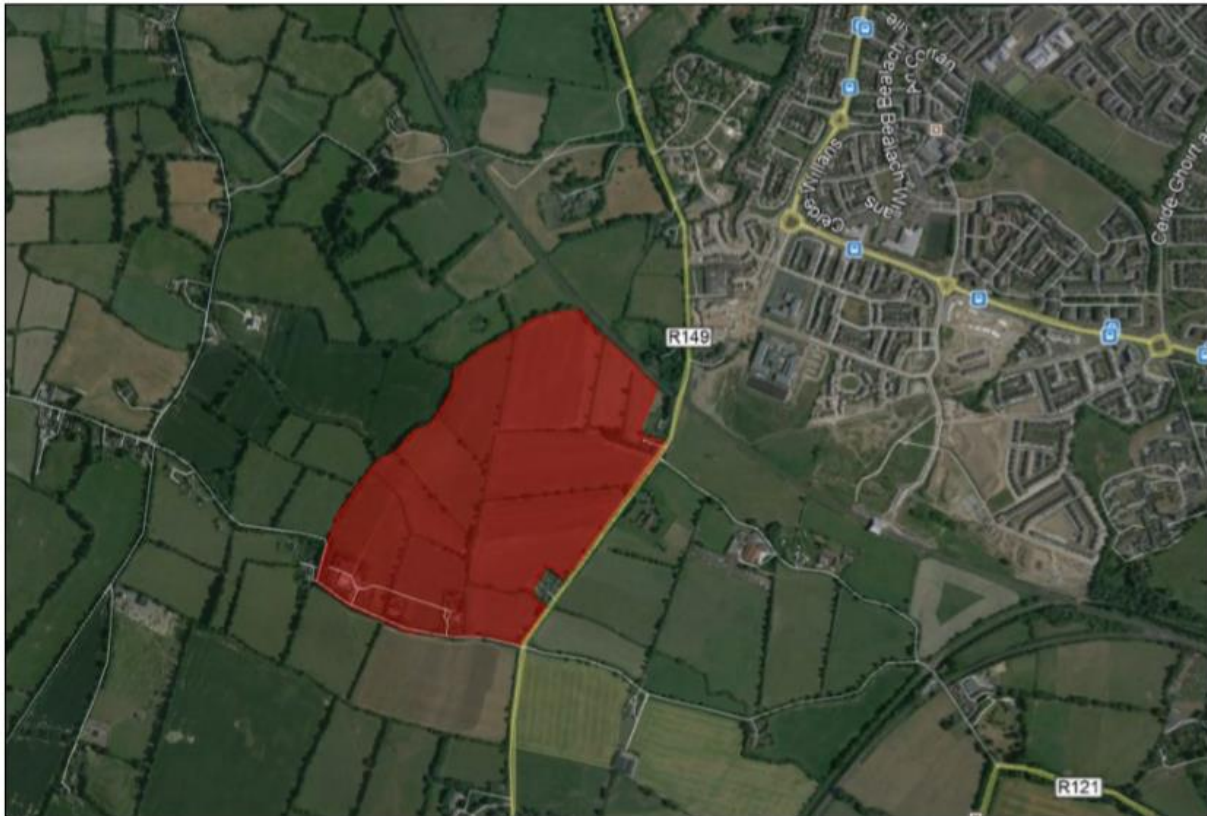


Figure 1. Site Location Map, taken from Google Earth. (Site Highlighted in Red)

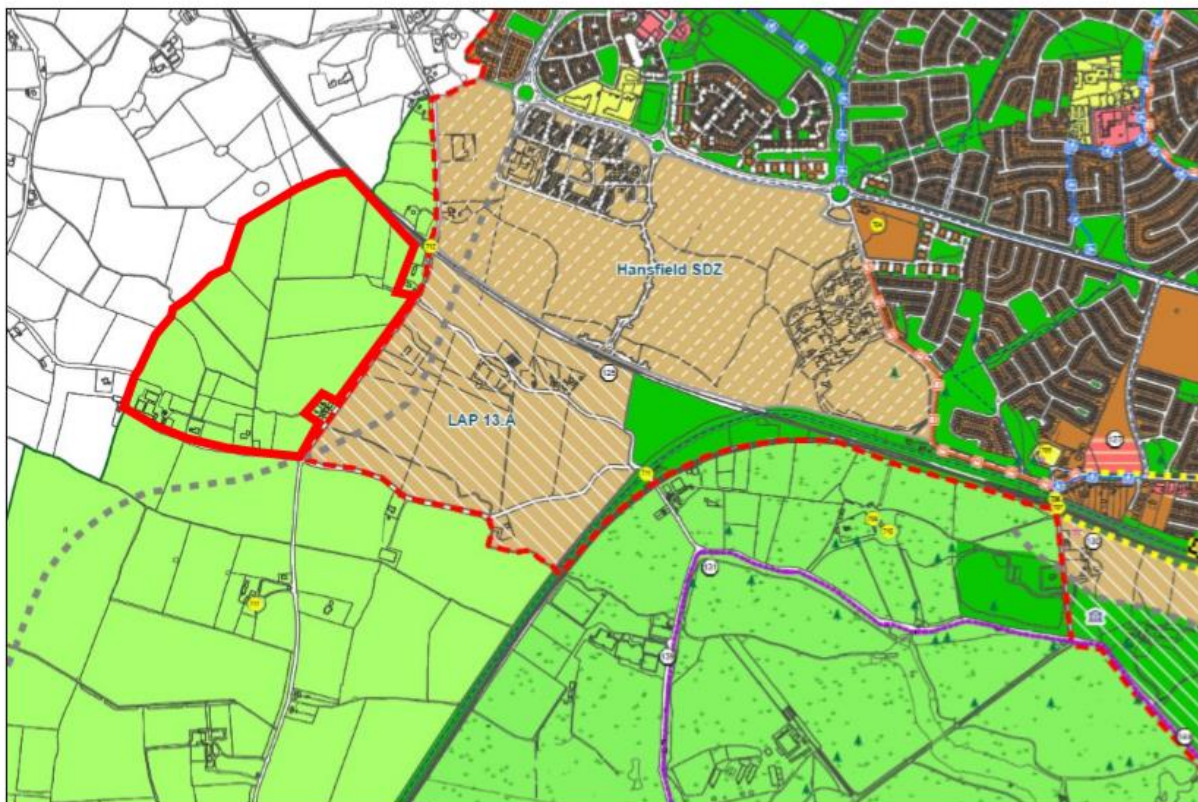


Figure 2. Development Plan Zoning Map (Site Outlined in Red) taken from Fingal County Development Plan and cropped by TPA.



Proposed Variation 2 of the Fingal Development Plan (FDP) 2017-2023 was published on the 10th of January by Fingal County Council (FCC). The variation seeks to update the Core Strategy of the plan in response to the publication of the National Planning Framework (NPF) 2018 and the Regional Spatial and Economic Strategy (RSES), published in 2019 by the Eastern and Midland Regional Assembly.

Having reviewed the current variation, it is out opinion that;

- The Variation to the FDP does not properly incorporate the population and housing forecasts outlined in the NPF and RSES; and
- The Variation to the FDP does not allow for sufficient zoned lands to accommodate the population targets outlines in the RSES; and
- FCC has made fundamental errors in coming to conclusions on capacity of lands in Fingal to accommodate future growth; and
- The Variation to the FDP fails to take into account the NPF, RSES and its own guidelines on gaining maximum benefits from existing infrastructure.

Table 6.2 of the Variation outlines the NPF/RSES Population Targets for Dublin and Fingal as follow:

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
<i>Source: NPF/RSES and CSO Census</i>					

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 provide 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. 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. 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 increase to 342,250 persons for 2026.

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



The assessment of delivered housing units in the plan is flawed, as it is based on the assumption that any permitted unit will convert into a delivered unit, and that this will be delivered by the end of the plan in 2023. Following this reasoning, FCC estimated that 5,582 units were ‘completed’ by 2019, which leaves an unmet capacity of 8,919 over the remaining life of the FDP (Section 6, page 25 of the Proposed Variation).

Firstly, the assessment does not mention the number of effectively completed units by 2019 and whether these units are considered to meet the targets identified in the 2011-2017 plan. This is a significant information lacking to the overall assessment of housing unit need in the county.

Secondly, assuming that all permitted units will deliver completed units is misleading, as is assuming that they will all be delivered by the end of the plan in 2023. As the table below indicates, there is a significant lag between grant of permission and the completion of the units.

Fingal Co.	DHTF Units with Planning Permission (Tier 1)	DoHPLG Commencements (all units/12mo prior)	BCMS	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.

More recent update for Q2 of 2019, published by the Dublin Housing Task force highlights that the % of units commenced for the total number of permitted units has fallen further to 22% in County Fingal, as highlighted in the table below (Housing supply Coordination Taskforce for Dublin, Quarter 2 2019 Returns, page 9).

Table 2(a): Tier 1 Subcategories Data

	Tier 1 Subcategories							
	Total Number of Permitted Units		Total Number of Units Built to Date		Total Number of Units Under Construction		Total Permitted but not Commenced	
	Houses	Apartments	Houses	Apartments	Houses	Apartments	Houses	Apartments
DCC	1,481	10,148	313	220	281	1,339	887	8,589
DLRCC	2,819	10,059	937	1,314	470	1,081	1,383	7,693
SDCC	3,865	2,472	1,407	16	1,096	433	1,362	2,023
FCC	9,223	6,427	3,791	849	1,668	938	3,764	4,640
Total	17,388	29,106	6,448	2,399	3,515	3,791	7,396	22,945



In the light of this significant time lag, we consider that the quantum of zoned land in the County is not sufficient to accommodate the RSES population predictions.

The Variation updates the Remaining Zoned Land Capacity, contained in Table 2.6 and 2.8 of the FDP. Again, the numbers have to be taken as face value, as no background information is provided about the geographical area covered by each of the Town/Village category.

No information is provided as to how the number of hectares remaining in September 2019 (date of the variation update) has been derived from the numbers provided in 2017. The variation states on page 25 that;

“To date (September 2019), 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 “.

However, the difference between remaining land capacity in 2017 and 2019 is 6,437 units. No explanation is provided in the variation for this difference.

We assert that the evidence from the Variation is not robust enough to sustain the claim that the Fingal Development Plan will deliver enough housing units to meet the needs to 2023. The zoning of readily available sites like Barnhill, Clonsilla should be considered as a way of meeting those housing needs.

North-West Corridor Growth Strategy

The Metropolitan Area Strategic Plan (MASP) for the Dublin Metropolitan Area, contained in the RSES localises the housing priorities identified in the NPF:

“The NPF sets out ambitious targets to achieve compact growth with 50% of housing to be provided within or contiguous to the built-up area of Dublin City and suburbs. To achieve this, the MASP identifies strategic residential and employment corridors along key public transport corridors existing and planned, that contain development opportunities. These include [...] the development of the Hansfield SDZ lands in Blanchardstown.”

The RSES also promotes;

“Sustainable development patterns which promote compact growth, reduce transport demand and encourage low carbon transport modes”

In particular, this is provided through the consolidation and re-intensification of spatial development patterns, as outlined below:

“RPO 4.3: Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.”

One of the key public transport projects in the Dublin region is the upgrading of the Dublin - Dunboyne line as identified in the North-west Corridor Strategy of the RSES.

“North - West Corridor (Maynooth/Dunboyne line and DART expansion) Strategic development areas along the Dunboyne/M3 parkway line include the Dublin Enterprise Zone (linked to



improved bus connections), Hansfield lands and the sequential development of lands in Dunboyne served by the M3 Parkway station. The proposed electrification of the main Maynooth line, to be delivered by 2027, will support sequential growth in Leixlip and Maynooth.”

These policies are combined into what the RSES calls the North-West corridor growth area, within which Dublin 15 has a role to play in delivering residential development.

Corridor	Residential	Employment/ Mixed Use	Phasing/Enabling infrastructure
North-West corridor (Maynooth/ Dunboyne commuter line/DART)	Dublin 15 lands - continued development of Hansfield linked to the future development of Barnhill and Kellytown landbanks to the south and east	Further development of large-scale employment in Dublin Enterprise Zone** and synergies with Blanchardstown IT	Short term Public transport, Clonsilla Station, water network and waste water upgrades.

As identified in the table above from the RSES, there are existing residentially zoned lands at Barnhill. The consolidation of the urban fabric at Barnhill would enable the maximisation of existing infrastructure and services, including the new station which opened at Hansfield in 2013 (Irish Rail), offering a sustainable and fast transport mode to the city. This station is situated 600m from the proposed site.

The lands proposed for rezoning in Barnhill are located at the boundary of the Barnhill LAP 2019 lands and close to Hansfield SDZ. Clonsilla is identified in the variation proposal as a Consolidation Area within the Metropolitan Area.

The main policy aim of the variation for the area is to;

“to gain maximum benefit from existing transport, social, and community infrastructure through the continued consolidation of the city and its suburbs.” (Proposed variation, section 6, page 40).

This policy remains the same as in the existing Fingal County Development Plan, along with Objective SS15 and SS16 which states:

Objective SS15 - *Strengthen and consolidate existing urban areas adjoining Dublin City through infill and appropriate brownfield redevelopment in order to maximise the efficient use of existing infrastructure and services.*

Objective SS16 - *Examine the possibility of achieving higher densities in urban areas adjoining Dublin City where such an approach would be in keeping with the character and form of existing residential communities, or would otherwise be appropriate in the context of the site.*

We propose that rezoning of the currently unzoned lands at Barnhill, would be in compliance with the Fingal Development Plan, the NPF and the RSES. It is a readily available site, within the Metropolitan Area, within 600m of a railway station linked to Dublin City and benefitting from the proximity to the infrastructure of an SDZ and should be zoned for residential development in order to achieve the NPF and RSES goal of sustainable development.



Conclusion

As discussed in this submission, it is suggested 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:

- It is not appropriate to assume that all planning units permitted will be built-out. At present there is a c. 30% annual conversion rate from units permitted to units built in Fingal. For this reason, there needs to be a substantial over-supply of extant permissions in order to meet housing demand in an area. These should not be maximum figures. They should be minimum figures.
- The NPF and the RSES identify a need for land within easy reach of sustainable transport mode and readily available for housing as well as the growth opportunities represented by the North-West corridor. This is not translated in the Fingal Development Plan nor in the proposed variation to the Core Strategy.

The landholding of our client at Barnhill, Clonsilla complies with all the requirements set out in the NPF and the RSES for a sustainable residential site, while providing a ideal opportunity to consolidate the urban fabric within Dublin Metropolitan Area.

Should you require any further information in relation to this submission, please don't hesitate to contact the office.

Yours Sincerely

Laura Finn
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Tom Phillips + Associates