



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

**Public Submission on Variation No.2 of Fingal Development Plan 2017-2023**

Dear Officer,

Balbriggan Community Council have read the proposed variation no.2 to the Fingal Development Plan and now wish to make the following observations :-

- It is proposed to change Balbriggans status as a Large Growth Town to a 'Self-Sustaining Town' and we support this change.

We have looked up the meaning of a 'self-sustaining town' in the new Regional Spatial and Economic Strategy (RSES) and it states the following :-

Self-Sustaining Towns (Table 4.3 of RSES- Settlement Typologies and Policy Responses.)

Socio-Economic Function – Self sustaining growth towns and self-sustaining towns some of which have experienced rapid population growth and require 'catch-up' investment to become more self sustaining.

Transport Profile – Self-sufficient and commuter settlements with good public transport and regional transport links, some of which may be highly car dependent.

Policy Response – Consolidation coupled with targeted investment where required to improve local employment, services and sustainable transport options and to become more self-sustaining settlements.

Below table 4.3 the RSES then says that

*"the translation of these policy responses into core strategies in development plans should also consider the scale and location of settlements and accordingly the requisite nature and scale of development appropriate at these locations. In this regard , higher densities in core strategies should be applied to higher order settlements such as Dublin City, Regional growth Centres and Key Towns. However there should be a graded reduction in in residential densities for Self-Sustaining Growth Towns, Self-Sustaining Towns, Towns and Villages that are commensurate to the existing Built Environment".*

Balbriggan Community Council would therefore conclude from the RSES that Balbriggan is no longer earmarked for high density development and is instead earmarked for 'catch-up investment' . We very much welcome this as Balbriggan is a car-dependent commuter town and the buses and trains are operating at full capacity at present. The main street is congested with cars despite an inner relief road and a motorway being close-by. We are also being told by concerned parents that there is also a shortage of secondary school places in Balbriggan, particularly in the Ardgillan college / Castlelands area.

We do not see how these policy responses have been translated into the new core strategy of the Development Plan , we do note that there has been minor changes to text references to the RSES. We would therefore be concerned that the remaining zoned lands around Balbriggan may still be subject to high-density development when the RSES is saying to catch up on employment and infrastructure. Balanced growth is also mentioned and we would suggest that when new employers, hopefully situate on the serviced sites in Stephenstown and when eth Bremore Regional Park and Harry Reynolds road cycle-ways are completed, perhaps then additional houses could be considered. However at present the population already exists in Balbriggan and the town does need this catch-up investment.

Because there are significant zoned and undeveloped lands in Northwest Balbriggan and in Castlelands zoned 'RA' with a zoning objective to *'Provide for new residential communities subject to the provision of the necessary social and physical infrastructure.* And in light of Balbriggans new classification of a self-sustaining town, Balbriggan Community Council feel it is important that Fingal County Council adds a new objective to the Development Plan in the list of Balbriggan objectives to read as follows

**To Carry out a Social Infrastructure Audit in Balbriggan and to use the results of this Audit to inform decisions as to what catch-up investment in social infrastructure is needed in Balbriggan prior to permitting any further residential developments on 'RA' zoned lands.**

We would also like to point out the following with regards to the variation :-

**Amendment Ref:- Section 4.3 – No.12.**

Can the green text read as follows " Balbriggan is identified as a Self-Sustaining Town in accordance with the RSES definitions.

This is the same text used to revise the identity of Lusk & indeed Rush and we feel it is important to also link Balbriggan to the definitions in the RSES.

To say Balbriggan is the largest of the self-sustaining towns in the Core Area is not necessary and the same text should apply to Balbriggan as is applied to other self-sustaining towns.

Objective ED86 & Objective ED87 should now be removed as part of this variation as they single out Balbriggan as a growth centre and these references are linked back to the old NSS & RPG's.

Finally, in Section 4.3 Balbriggan, there still exists reference s to the now outdated Balbriggan Public Realm Plan. This plan was not implemented, and it would be more appropriate to now reference the 'Our Balbriggan' plan which was prepared between Fingal County Council and the Balbriggan community. We feel the opportunity should be taken now to mention Our Balbriggan in the text of the Development Plan.

Yours Faithfully,



Alice Davis – Chairperson

dated :- 6<sup>th</sup> February 2020