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To whom it may concern,

RE: PROPOSED VARIATION NO. 2 – ALIGNMENT OF FINGAL DEVELOPMENT PLAN 2017 – 2023 WITH NPF AND RSES

Cairn Homes welcome Fingal County Council's proposed variation which seeks to align the core strategy of the Fingal County Development Plan 2017 – 2023 with the National Planning Framework (NPF) and Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Region (EMRA). The alignment of the core strategy of development plans with national and regional policy is a key requirement under the Planning and Development Act (Amended) 2000.

Cairn Homes are currently one of the main housing developers in Ireland. Cairn have delivered 2,432 new homes across the Greater Dublin Area in the space of 4 years and intend to deliver a further 1,300 new homes predominately in the GDA this year, with 733 new homes already forward sold. Cairn are uniquely positioned to help address the chronic housing shortage due to our strategic landbank, and ability to deliver large high-quality developments quickly.

Within Fingal County Council (FCC), Cairn own c. 12.7ha in Swords with capacity for in excess of c.600 new homes and c. 2.7 ha in Donabate with capacity for c.70 new homes. Cairn have engaged with FCC in respect of the Swords site and hope to lodge a planning application for c. 600 new homes comprising houses, apartments and duplex units in Spring 2020. It is also our intention to prepare an application for our site in Donabate this year.

Cairn welcome the prioritisation of development in Swords by Fingal within the proposed variation. We wholly support FCC's intention to encourage and direct the majority of development in the county towards Swords as a Key Town. We also welcome the recognition given to the strategic role towns located along public transport corridors, such as Donabate, can play in the delivery of housing and sustainable growth. However, we are concerned about the assumptions made regarding population growth and housing demand. FCC have relied on the population figures contained within the NPF and RSES which are derived from the 2016 Census and conservative population growth trends. The latest data from CSO indicates higher levels of population growth than anticipated in 2016/2017. We are concerned that unless the most up to date figures are used, housing demand and need may be underestimated.

Core Strategy and Obligations upon the Planning Authority:

Cairn understand and recognise that the proposed variation has been brought forward in order to align the Core Strategy of the Fingal County Development Plan 2017 – 2023 with the NPF and recently adopted RSES as required under the Planning and Development Act. One element of this is alignment with the population targets set out in the NPF and RSES.

Section 10 (1a) of the Planning and Development Acts (2000 as amended), the following is outlined:

*“(1A) The written statement referred to in subsection (1) shall include a core strategy which shows that the **development objectives in the development plan are consistent, as far as practicable, with national and regional development objectives** set out in the National Planning Framework and the regional spatial and economic strategy and with specific planning policy requirements specified in guidelines under subsection (1) of section 28.”.*

Cairn are also aware that under Section 95 (1) of the Planning Act 2000 (as amended), planning authorities are obliged to:

“ensure that sufficient and suitable land is zoned for residential use, or for a mixture of residential and other uses, to meet the requirements of the housing strategy and to ensure that a scarcity of such land does not occur at any time during the period of the development plan.”

As shall be set out below, we believe that the population figure in the NPF and RSES are now out-dated and have been superseded by the latest figures produced by CSO. If the figures within the NPF and RSES are relied on, without consideration of the more up to date information, there is a risk population growth and housing requirements will be underestimated. We recognise that FCC may view themselves bound to these figures based on their requirements under the Planning Act. However, the wording of the Act (as set out in the highlighted text) stipulate an absolutist approach to the consistency between the core strategy and the regional development objectives set out in the National Planning Framework and the Regional Spatial and Economic Strategy. Rather, the requirement is for consistency “as far as practicable”. When considered in light of FCC’s requirement under Section 95 of the Act to ensure an sufficient availability of land, there would be appear to be sufficient flexibility to allow for additional capacity where it can be supported and justified by more up to date, scientific data such as information from the CSO.

We would request that this is borne in mind, in the consideration of the submission which follows.

Population Targets and Housing Need:

The NPF and RSES established population targets for each county. The population projections were based on the 2016 Census. The population targets include a low and a high range for 2026 and 2031. The targets for Dublin and Fingal are as follows:

	2016 Census	2026 Range		2031 Range	
		<i>Low</i>	<i>High</i>	<i>Low</i>	<i>High</i>
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

The latest population figures from CSO indicate Dublin’s population will grow to between 1,512,500 (low growth model) and 1,600,100 (high growth model) by 2026 and between 1,593,800 (low growth model) and 1,730,600 (high growth model) by 2031. CSO have not estimated population growth figures per county council area. However, allowing that Fingal represented 22% of Dublin’s population in 2016, we can estimate that Fingal’s population would be c. 340,000 – 350,000 in 2026 and c. 350,000 – 380,000 in 2031. It would appear, based on the latest available information, that population growth for Fingal has potentially been underestimated.

While we recognise that FCC is required to have consideration of the NPF and RSES figures, we would advocate that the potential for additional population growth in line with more recent information from the CSO is considered.

The proposed variation estimates the population of Fingal by 2023 will be 319,864. This is derived from an estimated population growth per annum of 3,378.6 under the RSES 2026 high growth projection. Based on an average household size of 2.68, the housing requirement to 2023 is estimated at 14,501 units. Cairn would have concerns that if the population growth has been underestimated then the number of units may also be underestimated.

Notwithstanding the potential underestimation of population, the calculation method used of housing need may also be underestimated. An average household size of 2.68 has been used in the calculation of housing requirement up to 2023. However, there is increasing evidence that insufficient housing supply has forced average household size up, resulting in what is referred to as “crowding”. Based on the 2016 Census, household size increased for the first time in 50 years between 2011 and 2016. This increase in household sizes is generally considered to not be the result of natural population growth but a symptom of undersupply in the housing market and other economic factors which reduced household formation levels. Basing housing need on current average household size therefore potentially underestimates the actual need.

The calculation also appears to make no allowance for the nearly 10-year undersupply of housing. Between 2011 and 2016 only 2,510 new units were built in Fingal, of which 330 were in Swords and 159 in Donabate according to the 2016 Census. Since 2016, according to the CSO, 6,724 new units have been delivered in Fingal based on house completion records. We know that nationally housing delivery continues to lag behind demand with latest estimates from the Central Bank indicating that 34,000 new homes will be required every year until 2030. The majority of these new homes are likely to be required within the GDA.

Fingal, and in particular settlements such as Swords, will play a central role in the delivery of these new homes. It is essential that potential housing need for Fingal is correctly estimated using the most up to date and accurate information available to ensure a robust, and rigorous housing need assessment.

Headroom

The County Council will be aware that in identifying land requirements for housing, the well-established approach to this as set out in the National Section 28 guidelines, is to allow an element of headroom of approx. 50% of land requirement, to reflect lands which are zoned and which may not come forward for development during the plan, having regard to constraints such as infrastructure, services and the unwillingness of some landowners to bring forward their land for development. This has proved to be an essential part of ensuring adequate land supply and it is respectfully submitted that this approach should be continued in the proposed variation to the Development Plan.

There are some suggestions in the Implementation Roadmap for the NPF and other documents, that it is not necessary to provide for the same level of headroom in the future, having regard to the uplift in population projections incorporated in the NPF.

However, CSO data has now demonstrated that these uplifted population projection figures in themselves, underestimate the level of population growth currently taking place and therefore, the need or headroom is actually even greater than previous and not less as anticipated by the NPF Implementation Roadmap.

The NPF places emphasis on the following in respect of managing the challenges of future growth:

'A more balanced and sustainable pattern of development, with a greater focus on addressing employment creation, local infrastructure needs and addressing the legacy of rapid growth, must be prioritised. This means that housing development should be primarily based on employment growth, accessibility by sustainable transport modes and quality of life, rather than unsustainable commuting patterns.'

In this respect, it is acknowledged that the NPF and RSES require a more detailed assessment of the suitability of potentially zoned land for development, including availability to infrastructure and services. However, it is recognised that it would take some time to comprehensively assess all lands in respect of these matters in preparation of the proposed variation timescale and it is difficult to accurately assess likely delivery levels.

Therefore, there is a need to maintain headroom levels of 50% or greater in the zoning of housing lands.

Swords:

Swords is designated a Key Town within the Metropolitan Area and Metropolitan Area Strategic Plan in the NPF and RSES. Cairn welcome and support the recognition given to Swords in the Core Strategy, reflective of its regional importance and potential to accommodate above average growth. Under the revised population targets set out in the RSES it is understood Swords will receive an increased allocation of 15,000 people. As discussed above, Cairn have reservations about the calculation of population growth. While we welcome the increased allocation for Swords, we would request FCC ensure that this allocation is sufficient to accommodate the potential housing need.

In order for Swords to deliver on its potential, it will be important the infrastructure is in place to support development. Based on discussions with FCC, Cairn are aware that a number of road junctions within Swords, particularly North Swords which are operating at or above their maximum capacity. The upgrading works of these junctions should be prioritised to facilitate development in line with the core strategy. Cairn are also aware of a potential wastewater capacity issue. Irish Water are currently preparing a capacity study for the area, however there have been delays in the publication of the report. It is essential that FCC and Irish Water work together to identify any potential capacity issues in area and address the requirement as quickly as possible. Development in Swords may be curtailed if these matters are not addressed.

Finally it is noted that there has been a reduction in the Total Residential Capacity as set out in Table 2.8 from 514 ha and a potential of 15,828 units in the adopted 2017 – 2023 development plan to 481 ha and a potential of 14,799 units in Proposed Variation 2. While we presume this is due to some land having been developed in the intervening period, it is requested that FCC provide clarity on this matter. Cairn would be strongly opposed to any reduction in capacity resulting from changes in population targets, rather than as a result of the sequential development of land.

Donabate:

Donabate is a Self-Sustaining Growth Town. Under the RSES it is located within the Metropolitan Area and Metropolitan Area Strategic Plan, and designated for planned strategic development along with Dunboyne, Leixlip and Greystones. Cairn welcome and support the position given to Donabate in the settlement hierarchy. The planned Dart Expansion programme will greatly enhance Donabate as a desirable location to live with high quality public transport connections.

Similar to Swords, Cairn understand there is a potential capacity issue in the Irish Water network serving Donabate. Cairn would request FCC work with Irish Water to identify and address any capacity issues to ensure they do not curtail development of a strategic town.

As with Swords, it is noted that there has been a reduction in the Total Residential Capacity for Donabate as set out in Table 2.8 from 116 ha and a potential of 4,056 units in the adopted 2017 – 2023 development plan to 101 ha and a potential of 3,532 units in Proposed Variation 2. Cairn would request FCC provide clarity on the reason for this reduction. Cairn would be strongly opposed to a reduction in capacity, save as a result of the development of the available land.

Conclusion:

Cairn welcome and support the FCC's proposed variation which seeks to align the core strategy of the Fingal County Development Plan 2017 – 2023 with the NPF and RSES. The recognition of the important role towns such as Swords and Donabate can play in the delivery of new homes in sustainable locations is welcomed and supported.

However, we are concerned that reliance on the population figures in the NPF and RSES may result in an underestimation of potential population growth and housing need. The latest figures from the CSO indicate higher levels of population growth up to 2026 and 2031 then envisaged in the NPR and RSES. We are also concerned that the actual housing need has been underestimated based on the average household size

employed in FCC's calculation. The latest figures from the Central Bank indicate c.34,000 new homes will be required each year to 2030 just to meet current demand, the majority of which will be in the GDA. It is imperative that GDA authorities such as Fingal ensure that projected population growth, and housing need are adequately, robustly and rigorously assessed based on the latest available information. Underestimation of these demographic changes may inhibit supply.

Finally, Cairn are aware of potential infrastructural capacity issues within Fingal which need to be prioritised and addressed in order to ensure no infrastructural barriers to development. We would encourage FCC to review infrastructural capacity in the county and work with other relevant state bodies to ensure there is sufficient capacity to meet housing need.

Cairn look forward to further engagement with Fingal County Council on the proposed variation.

Yours Sincerely



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