

Senior Executive Officer
Planning and Strategic Infrastructure Department
Fingal County Council
County Hall,
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7 February 2020

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, McGarrell Reilly Group of Garryard House, Earlsfort Terrace, Dublin 2, in respect of their landholdings at Barnhill.

The provision of compact urban communities reliant principally upon public transport with significantly reduced reliance upon the private car and unsustainable commuting patterns is a key tenet of national planning policy as acknowledged and articulated in the National Planning Framework (NPF).

The recently adopted Regional Spatial and Economic Strategy (RSES) 2019 seeks to implement this vision of achieving greater consolidation and compact growth in appropriate locations, particularly along public transport corridors.

Section 5.3 of the RSES identifies guiding principles for development in 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.*

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Development within the metropolitan area that is underpinned by these guiding principles including compact growth and integrated transport and land use, will promote better quality of life for the population, more efficient use and provision of public services, including public transport, and reduced carbon emissions enabling Ireland to pay its part in working towards a “net zero carbon economy”.

The Clonsilla Pace Railway Line together with the Maynooth Line and stations at Clonsilla and Hansfield/Barnhill is a key piece of heavy rail infrastructure for the Fingal. It represents a significant piece of existing investment for the State in public transport. It is important that the strategic importance of the “Clonee to Pace” rail corridor in implementing and achieving the delivery of high quality compact urban places with good sustainable transport links is recognised in the Development Plan.

Blanchardstown, unlike some other areas of significant planned population growth in Fingal, can rely upon existing infrastructure and as such has the ability to deliver new sustainable communities quickly without the need to wait for funding and development of significant new, lower capacity, public transport projects.

The following modification in **[RED]** to the draft variation is proposed –

Blanchardstown is within the Dublin City and Suburbs boundary identified in the RSES. The MASP, contained within the RSES, has identified Blanchardstown on the North West Strategic Corridor which stretches from Dublin City Centre out along the Maynooth/Dunboyne lines and DART expansion. This is a key strategic residential and employment corridor along a public transport corridor which contains development opportunities such as Hansfield **[and Barnhill]** and employment at strategic employment hubs such as Dublin Enterprise Zone.

Further, Blanchardstown is strategically located at the intersection of the N3 and M50 national roads and is the largest settlement centre in Fingal. Designated as a Level 2 ‘Major Town Centre’ in the Retail Strategy for the Greater Dublin Area, it is also one of the largest and most important retail centres in the State. In addition to Blanchardstown Town Centre, a number of large public sector employers are based in the area including Fingal County Council, Connolly Hospital and the Institute of Technology (ITB). The IDA has also been particularly successful in marketing Blanchardstown as a key location for foreign direct investment and a number of large ICT and pharmaceutical companies have long established operations in the area. The state-of-the-art National Sports Campus is located nearby at Abbottstown. Lands at Hansfield are designated as a Strategic Development Zone (SDZ) and this planned new sustainable community **[together with the Barnhill LAP lands]** will be served by rail via the newly constructed railway station at Hansfield on the Clonsilla to M3 Parkway railway spur.

Under Sections 9(4) and 9(5) of the Planning and Development Act, 2000 (as amended), planning authorities are required to coordinate and consider the likely effects of the development plan objectives with planning authorities in adjoining areas, as follows:

(4) In making a development plan in accordance with this Chapter, a planning authority shall have regard to the development plans of adjoining planning authorities and shall co-ordinate the objectives in the development plan with the objectives in the plans of those authorities except where the planning authority considers it to be inappropriate or not feasible to do so.

(5) In making a development plan in accordance with this Chapter, a planning authority shall take into account any significant likely effects the implementation of the plan may have on the area of any adjoining planning authority having regard in particular to any observations or submissions made by the adjoining authority.

Whilst it is acknowledged that county administrative boundaries potentially present obstacles to the planning and development of sustainable infrastructure and communities, the National Planning Framework (2018) and Regional Spatial and Economic Strategy (2019) have been prepared to ensure local authorities implement a cohesive, coordinated and sustainable approach to development that achieves a targeted pattern of growth.

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

McCutcheon Halley Chartered Planning Consultants