

# Draft Fingal Development Plan Chief Executive's Report (Consolidated) 22nd July 2016



Be part of it.

**Fingal Development  
Plan 2017-2023**

Comhairle Contae  
Fhine Gall  
Fingal County  
Council





---

# **Draft Fingal Development Plan Chief Executive's Report (Consolidated)**

**22nd July 2016**

**Chief Executive**  
Paul Reid

**Director of Services**  
AnnMarie Farrelly

**Senior Planner**  
Matthew McAleese



# CONTENTS

---

## PART ONE

### **An Explanation Of The Legislative Requirements For The Making Of The New Development Plan & Chief Executive’s Report, A Description Of The Consultation Process And An Overview Of The Issues Raised**

Purpose and Contents of the Chief Executive’s Report	1
Legislative Background for the Fingal Development Plan	1
Form and Content of the Draft Fingal Development Plan	2
Preliminary Consultation Process – Pre-Draft Plan	3
Current Consultation Process – Draft Plan and Next Stages	3
Approach to Consideration of Submissions	5

## PART TWO

### **Analysis And Summary of the Issues Raised in the Submissions Received by the Council by Written Statement Chapter’s/Appendices & Accompanying Documents and Maps**

#### **Introduction**

Submissions from the Eastern and Midland Regional Assembly, National Transport Authority and Department of Housing, Planning, Community and Local Government	9
--	---

#### **Chapters**

Chapter 1: Introduction & Strategic Context	37
Chapter 2: Core Strategy and Settlement Strategy	48
Chapter 3: Placemaking	50
Chapter 4: Urban Fingal	60
Chapter 5: Rural Fingal	121
Chapter 6: Economic Development	142
Chapter 7: Infrastructure and Movement	162
Chapter 8: Green Infrastructure	201
Chapter 9: Natural Heritage	207
Chapter 10: Cultural Heritage	214
Chapter 11: Land Use Zoning Objectives	222
Chapter 12: Development Management Standards	228

#### **Map/Sheets**

Sheet 2: Fingal North	239
Sheet 3: Fingal Central	245
Sheet 4: Balbriggan	260
Sheet 5: Skerries	271
Sheet 6: Lusk (6A) & Rush (6B)	279
Sheet 7: Donabate-Portrane	293
Sheet 8: Swords	307
Sheet 9: Malahide-Portmarnock	319
Sheet 10: Baldoyle-Howth	336
Sheet 11: Fingal South	341
Sheet 12: Blanchardstown North	354
Sheet 13: Blanchardstown South	363
Sheet 14: Green Infrastructure 1	378

# CONTENTS

---

Sheet 15:	Green Infrastructure 2	379
Sheet 16:	Green Infrastructure 3	380

## **Associated Submissions**

Fingal Housing Strategy (Draft Plan Appendix 1)	383
Record of Protected Structures (Draft Plan Appendix 2)	385
Other	386
Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)	387

## **APPENDICES**

Appendix A:	Maps of Chief Executive's Recommendations
Appendix B:	Development Plan Timeline
Appendix C:	List of all Submissions Received
Appendix D:	List of Prescribed Bodies

# PART ONE



## AN EXPLANATION OF THE LEGISLATIVE REQUIREMENTS & CHIEF EXECUTIVE'S REPORT



# PART ONE

## An Explanation of the Legislative Requirements & Chief Executive's Report

### Purpose And Contents of the Chief Executive's Report

The purpose of the Chief Executive's Report is to report on the outcome of the consultation process on the new Draft Fingal Development Plan, set out the Chief Executive's response to the issues raised in the submissions, and to make recommendations on changes to the Draft Plan. The report forms part of the statutory procedure for the preparation of a new Development Plan.

Under Section 12 (4) (a) of the *Planning and Development Act 2000* (as amended) the Chief Executive is required to prepare a report on any submissions and observations received and submit the report to the Members of the authority for their consideration. The report is required to (i) list the persons or bodies who made the submissions or observations, (ii) summarise the issues raised by the persons or bodies who made submissions or observations, and (iii) give the response by the Chief Executive to the issues raised taking account of any direction of the Members of the authority, the proper planning and sustainable development of the area, the statutory obligations of the authority and any relevant policies or objectives of the Government or of any Minister of the Government.

**Part One** of this report consists of a description of the structure of the report, the process and next steps in making the new Fingal Development Plan, and a report on the consultation undertaken for the Draft Plan which resulted in 905 no. submissions during the second statutory public consultation stage (Stage 2).

**Part Two** covers the Written Statement/Appendices/Accompanying Documents and Maps respectively. There is an analysis of the submissions received relevant to each sheet and chapter, followed by the Chief Executive's opinion on these issues and recommendations. Editorial changes and updating of the Draft Plan will be carried out.

Four Appendices are presented in a separate document:

Appendix A: Maps of Chief Executive's Recommendations

Appendix B: Development Plan Timeline

Appendix C: List of all submissions received.

Appendix D: List of Prescribed Bodies.

## **THIS REPORT IS SUBMITTED TO COUNCIL MEMBERS FOR THEIR CONSIDERATION**

### Legislative Background for the Fingal Development Plan 2017-2023

The prescribed process for a County Development Plan is set out in the *Planning and Development Act 2000*. It gives a ninety-nine week period for adoption of the Plan. The timetable for the preparation of the Fingal Development Plan 2017-2023 is outlined in Appendix A.

The *Planning and Development Act 2000* sets out mandatory objectives which must be included in a Development Plan. These include, inter alia, objectives for the zoning of land, the provision of infrastructure, the conservation and protection of the environment, and the integration of the planning and sustainable development of the area with the social, community and cultural requirements of the area and its population. Other non-mandatory objectives are also referred

# PART ONE

---

to in the Planning Act. There is also a requirement for a Strategic Environmental Assessment and Appropriate Assessment of the new Development Plan.

In accordance with Article 13A of the *Planning and Development (Strategic Environmental Assessment) Regulations 2004* (S.I. 436 of 2004), the Council must carry out a Strategic Environmental Assessment (SEA) before the Plan may be adopted. The SEA is an integral part in the development of the Plan.

A Strategic Flood Risk Assessment (SFRA) was undertaken for the plan area having regard to the Ministerial planning guidelines on *The Planning System and Flood Risk Management*. Flood Risk assessment has integrated into the SEA process. The Strategic Flood Risk Assessment has been published as a separate document in conjunction with the Draft Plan.

In accordance with European and National legislation, the Council carried out a *Strategic Environmental Assessment (SEA)* and an *Appropriate Assessment (AA)* under the Habitats Directive, which informed the preparation of this Draft Plan. These assessments are undertaken so the impact of the proposed Draft Plan objectives on the environment can be evaluated, and used to inform the direction of the Draft Plan to ensure that our built environment responds to the sensitivities and requirements of the wider national environment.

Ministerial Guidelines issued to Planning Authorities regarding their functions under the Planning acts have been considered in the making of this Plan and have been implemented in the various chapters, in accordance with Section 28 of the *Planning and Development Act 2000 (as amended)*.

## **Form and Contents of the Draft Fingal Development Plan 2017 – 2023**

The Draft Development Plan consists of a Written Statement, Appendices, Maps and Accompanying Documents.

The Written Statement is divided into 12 separate chapters, listed below, with Chapters 1 and 2 setting out the vision, strategic context, aims, goals and the settlement and core strategies for the County. Chapters 3 to 10 set out the policies, objectives and actions required under a range of topics including placemaking, urban and rural Fingal, economic development, infrastructure and movement, green infrastructure, and natural and cultural heritage. Chapters 11 and 12 set out the land use zoning policies and development management standards for the County. The accompanying documents comprise the SEA, NIR and SFRA.

Chapter 1:	Introduction & Strategic Context
Chapter 2:	Core Strategy and Settlement Strategy
Chapter 3:	Placemaking
Chapter 4:	Urban Fingal
Chapter 5:	Rural Fingal
Chapter 6:	Economic Development
Chapter 7:	Movement and Infrastructure
Chapter 8:	Green Infrastructure
Chapter 9:	Natural Heritage
Chapter 10:	Cultural Heritage
Chapter 11:	Land Use Zoning Objectives
Chapter 12:	Development Management Standards

Appendix 1:	Fingal Housing Strategy
Appendix 2:	Record of Protected Structures

# PART ONE

---

- Appendix 3: Recorded Monuments
- Appendix 4: Technical Guidance Notes
- Appendix 5: Implementation of Ministerial Guidelines
- Appendix 6: Map Based Local Objectives

Strategic Environmental Assessment  
Natura Impact Report  
Strategic Flood Risk Assessment

## **Preliminary Consultation Process: Pre Draft Plan**

The preliminary consultation process, the Pre-Draft consultation stage, ran from the 20<sup>th</sup> March 2015 to the 15<sup>th</sup> May 2015. A plain language Consultation Booklet '*Fingal Development Plan 2017-2023 – Be part of it / Plean Forbartha Fhine Gall 2017-2023 Bi pairteach ann*' was published, in both English and Irish, which formed the basis for the public consultation process. The booklet was distributed to households in Fingal as well as made available in libraries, community centres and Council Offices throughout the County.

The Chief Executive's Report: Pre-Draft Consultation was issued to the elected members on 10<sup>th</sup> July 2015. The Report was considered at Council Meetings held on 4<sup>th</sup> and 11<sup>th</sup> September 2015 and the elected members directed the Chief Executive to prepare the Draft Development Plan.

The Chief Executive's Draft Plan was subsequently prepared and considered by elected members at a series of meetings held in January and February 2016. Following these meetings the Draft Plan was duly prepared and the current (Stage 2), of public consultation began on 19<sup>th</sup> February 2016.

## **Current Consultation Process: Draft Plan and Next Stages**

The *Planning and Development Act 2000 (as amended)* requires that the Draft Plan is put on Display for not less than 10 weeks. The Stage 2 Draft Plan consultation period ran from 19<sup>th</sup> February 2016 to the 29<sup>th</sup> April 2016. Details are as follows:

- Press: On 19<sup>th</sup> February 2016 an advertisement was placed in the Irish Times newspaper announcing that a Draft Fingal Development Plan had been prepared for the County. This was also published in the Fingal Independent on the 22<sup>nd</sup> February 2016 and the Blanch Gazette on 25<sup>th</sup> February 2016. A press release was also sent to local and national papers in March 2015 giving details of the commencement of the Development Plan process, the public meetings arranged and how members of the public could become involved and make submissions. The press release also encouraged people to the dedicated website for further information.
- The Draft Plan was placed on display at the Fingal County Council Offices: County Hall, Main Street, Swords Co. Dublin and the Civic Offices, Grove Road, Blanchardstown, Dublin 15. The Draft Plan was also displayed at the following Fingal public libraries: Balbriggan Library, Baldoyle Library, Blanchardstown Library, Garristown Library, Howth library, Malahide Library, Rathbeale Library, Skerries Library, Donabate Library and Rush Library at the Public Information Days.

# PART ONE

Public Information Sessions		
Location	Date	Time
County Hall, Main Street, Swords, Co Dublin	Tuesday 8th March	4.00 pm – 8.00 pm
Blanchardstown Library, Civic Centre, Blanchardstown Centre, Dublin 15	Thursday 10 <sup>th</sup> March	4.00 pm – 8.00 pm
Balbriggan Library, George’s Square, Balbriggan, Co Dublin	Tuesday 15 <sup>th</sup> March	4.00 pm – 8.00 pm
Rush Library, Chapel Road, Rush, Co. Dublin	Monday 4 <sup>th</sup> April	4.00 pm – 8.00 pm
Baldoyle Library, Strand Road, Baldoyle, Dublin 13	Thursday 7 <sup>th</sup> April	4.00 pm – 8.00 pm
County Hall, Main Street, Swords, Co Dublin	Thursday 14 <sup>th</sup> April	4.00 pm – 8.00 pm
Crowne Plaza Hotel, Northwood Park, Santry, Dublin 9	Tuesday, 19 <sup>th</sup> April	4.00 pm – 8.00 pm

- Details of the Development Plan review, the Draft Plan together with other relevant documents were also placed on the Council Website, where submissions could be made online. During the public consultation process the Council also prepared a Social Media Strategy and used social media, specifically Facebook and Twitter, to disseminate information and raise the profile of the Draft Plan and the public consultation sessions, particularly the Public Information Days. In addition more traditional posters in public areas were employed to promote awareness of, and participation in the process.
- During the public consultation period in excess of 450 persons attended the 7 Public Information Days. There were in excess of 22,970 ‘hits’ on [www.fingal.ie/devplan](http://www.fingal.ie/devplan) with unique page views of 15,037. There was also regular activity on Facebook and Twitter.
- There were 897 no. submissions received during this public consultation period, 28 no. submissions received by email, 275 submissions made online (web based submissions) and 594 no. submissions were received by post / by hand. All submissions received have been considered in the preparation of this CE report.

The Council wishes to express its appreciation to those who made submissions and the large number of submissions and observations received highlights the significant level of public interest in the plan-making process.

Not later than 22 weeks after the notice of the Draft going on display, the Chief Executive is required to produce a report listing the submissions, summarising the issues raised, preparing responses and making recommendations.

## Next Stages

Under Section 12 (5) of the Act, following receipt of this Chief Executive’s Report and revised Draft, the members are required to consider the Draft and the Chief Executive’s Report. Such consideration must be completed within 12 weeks, within which the members may amend and accept the Draft. Material alterations made must go on public display, under Section 12 (7).

Following consideration of the Draft Development Plan and Chief Executive’s Report with associated proposed Chief Executive’s amendments, Members may then accept the Draft Plan

# PART ONE

without material amendments, and make the Development Plan. Should amendments be accepted which would constitute material alterations to the Draft Plan, there is a further public display period giving people an opportunity to comment on the proposed amendments only. This is followed by the preparation of a Chief Executive's Report for members on any submissions or observations received on the proposed amendments.

Members may then make the Development Plan with or without the proposed amendments or with modifications to the proposed amendments as they consider appropriate.

## **Approach to Consideration of Submissions**

Following the initial recording and scanning of all submissions, each submission was read first to allocate the issues raised to the appropriate sheets and chapters of the Development Plan. Some submissions received included issues not relevant to the Development Plan, and in some cases not relevant to planning generally or local authority operations and such points cannot be included in the Chief Executive's report. Listed below are the numbers of submissions received relating to the individual sheets or the text. The total numbers listed below exceeds the overall number of submissions, reflecting the high number of submissions that raised more than one issue or policies for one area.

Submissions were received relating to the Written Statement or Accompanying Documents, relating to the following areas:

## **WRITTEN STATEMENT/APPENDICES/ACCOMPANYING DOCUMENTS**

<b>CHAPTER</b>	<b>Relevant Submissions</b>
<b>Introduction &amp; Strategic Context</b>	8
<b>Core Strategy and Settlement Strategy</b>	16
<b>Placemaking</b>	39
<b>Urban Fingal</b>	122
<b>Rural Fingal</b>	133
<b>Economic Development</b>	50
<b>Infrastructure and movement (&amp; Dublin Airport)</b>	75 (& 23)
<b>Green Infrastructure</b>	16
<b>Natural Heritage</b>	10
<b>Cultural Heritage</b>	19
<b>Land Use Zoning Objectives</b>	34
<b>Development Management Standards</b>	23
<b>Appendices</b>	
<b>Fingal Housing Strategy</b>	3
<b>Record of Protected Structures</b>	2
<b>Recorded Monuments</b>	0
<b>Technical Guidance Notes</b>	0
<b>Implementation of Ministerial Guidelines</b>	0
<b>Map Based Objectives</b>	0
<b>Accompanying Documents</b>	4

# PART ONE

Submissions were received relating to the Sheets / Maps, relating to the following areas:

## MAP SHEETS

Sheet No.	Area	Relevant Submissions
Sheet 1	County Strategy	0
Sheet 2	Fingal North	36
Sheet 3	Fingal Central	147
Sheet 4	Balbriggan	25
Sheet 5	Skerries	20
Sheet 6a	Lusk	18
Sheet 6b	Rush	364
Sheet 7	Donabate - Portrane	35
Sheet 8	Swords	37
Sheet 9	Malahide - Portmarnock	44
Sheet 10	Baldoyle - Howth	14
Sheet 11	Fingal South	33
Sheet 12	Blanchardstown North	21
Sheet 13	Blanchardstown South	52
Sheet 14/Sheet15/Sheet16	Green Infrastructure	4

# PART TWO



## CHIEF EXECUTIVE'S REPORT DRAFT FINGAL COUNTY DEVELOPMENT PLAN 2017-2023

### INTRODUCTION



# PART TWO

## CHIEF EXECUTIVE'S REPORT DRAFT FINGAL COUNTY DEVELOPMENT PLAN 2017-2023

### Introduction

Eastern Midlands Regional Assembly (EMRA) Submission:

#### **Summary of Issues:**

The function and role, including legislative context, of the EMRA is set out under the submission. The Assembly also acknowledges the work of Fingal in co-ordinating policies so that they are consistent with the Greater Dublin Area Regional Planning Guidelines (RPGs). The Assembly considers that the overall population and housing targets proposed in the core strategy and the policies and objectives contained in the Draft Plan 'are generally consistent with the Regional Planning Guidelines'.

#### **Core Strategy and Settlement Strategy:**

The Assembly welcomes the statement of the Fingal Draft Plan that 'Planning Policy remains one of consolidation within the metropolitan area with expansion only happening in tandem with the planned, committed development of high quality or light rail based public transport projects.

The submission recommends, in keeping with the RPGs, future population growth (RPG requirement) should be directed to the Metropolitan Areas of Fingal and in accordance with the Settlement Hierarchy outlined in the RPGs. It is considered prudent that in providing the capacity to achieve population targets, housing numbers and overall zoned land available for residential development should ensure that there is sufficient capacity for the RPG housing targets.

Clarification and justification of the quantum of new residential units is sought, including any estimates and headroom stated, and where necessary figures should be revised to be in keeping with the RPGs. The submission also requests that future development lands at Lissenhall and Dunsink should be clearly rationalised in the context of the RPGs and cognisant of the residential capacities required for Fingal stated as part of the Core Strategy. With regard to Lissenhall, it is considered that a justification for this proposal is required.

It is requested that residential capacity specified in the tables should bear reference to population projections included within the Core Strategy and where necessary justification provided.

#### **Placemaking:**

The Assembly welcomes the dedicated chapter to Placemaking in the Draft Plan as a means to delivering sustainable communities through, amongst other things, reinforcing the Settlement Strategy and associated Core Strategy in the Draft Plan.

#### **Urban & Rural Fingal:**

Justification for the inclusion of lands for development purposes at Lissenhall and Dunsink is sought. Notwithstanding this point, The Assembly welcomes that both of these areas are to be subject to more detailed investigation through the provision of Local Area Plans.

The rationalisation of Local Area Plans, Masterplans and Urban Framework Plans in the County is recommended.

# PART TWO

---

## **Economic Development:**

The Assembly welcomes the recognition of Fingal in the plan as a key authority for driving economic development in the Eastern and Midland Regional Assembly area and playing a strong supporting role to the Dublin City Gateway. Similarly, the recognition of plan policy in relation to the strategic importance, to national social and economic policy, of Dublin Airport is welcome.

The submission notes that the centres of Donabate, Lusk and Rush are categorised as Level 3 centres as opposed to their previous categorisation at Level 4. Whilst the nature, role and function of these centres are recognised, it is suggested that the Plan should reflect that contained in the RPGs, and the Retail Strategy for the Greater Dublin Area.

With regard to types and location of employment, the objective to ensure sufficient quantum and appropriate types of lands in urban and rural located centres in accordance with the settlement hierarchy is extremely welcomed by the Assembly. It is suggested that an analytical approach by the local authority to the complex issue of lands to be identified for enterprise and employment would also be beneficial for the plan. In the context of economic development, justification for the inclusion of development lands at Lissenhall should be provided.

## **Movement and Infrastructure:**

The Assembly supports the requirement for additional infrastructure capacity in water, wastewater and transport to facilitate this. In addition, The Assembly welcomes policies in support of nationally and regionally significant infrastructure including Metro North and Dublin Airport.

The Assembly indicate that a number of areas zoned for development purposes are identified as being of a high or moderate risk of flooding. It is requested that all lands should satisfy the requirements of the "Planning System and Flood Risk Assessment Guidelines for Planning Authorities (2009)".

## **Green Infrastructure:**

The Assembly welcomes the proposal of a Green Infrastructure Strategy for the County as an output of the Plan, as a recommendation from the Regional Planning Guidelines.

## **Natural and Cultural Heritage:**

The Assembly supports policies included as part of the DDP to protect and natural and cultural heritage in line with Chapter 7 of the RPGs.

## **Land Use Zoning Objectives:**

The Assembly recommends the rationalisation of the numerous Local Area Plans, Masterplans and Urban Framework Plans indicated.

## **Development Management Standards:**

This Assembly considers this section of the Plan to be a useful section.

## **SEA & AA:**

The submission notes that a number of amendments are proposed to policies/objectives of the Draft Plan as part of the SEA Environmental Report but which have not been incorporated. The Assembly agrees that a number of these proposed amendments are not required as they are included as part of the overarching planning policy contained in the Draft Plan. However the Assembly requests that the Planning Authority review these amendments and where necessary provide a clear justification for non-inclusion of same where this has not already been provided.

# PART TWO

---

It is also noted that the Natura Impact Statement identified particular lands at Lissenhall as prone to flooding and having a direct connection with the Rogerstown Estuary SAC and SPA. Clarity and justification for the inclusion of development lands at Lissenhall is requested.

## **Chief Executive Response:**

### **Introduction:**

The positive recognition of the direction of the Plan, particularly recognition that the Core Strategy is generally consistent with the Regional Planning Guidelines for the GDA is welcomed. Similarly, the recognition by the Assembly that the work of Fingal in co-ordinating policies so that they are consistent with the Greater Dublin Area RPGs and that planning policy in Fingal remains one of consolidation within the metropolitan area with expansion only happening in tandem with the planned, committed development of high quality or light rail based public transport projects is also welcomed.

### **Core Strategy and Settlement Strategy:**

The requirement to include population growth is acknowledged, with the overall population figure prescribed as part of the Draft Plan which is in keeping with the RPGs. The submission of DECLG advises Fingal to have due consideration to the Dublin Housing Supply Co-Ordination Task Force and to prioritise the provision of housing. Likewise, the submission of the EMRA states that housing figures should not be compromised. Having regard to this the Core Strategy has focused on fulfilling the requirements of the allocated housing units in the RPGs. The Council are satisfied that the provision of these units within each of the settlements is sufficient to provide for the anticipated population growth as identified in the RPGs.

Having regard to the current housing crisis, the fluid nature of the current housing market, and pending the forthcoming release of updated CSO figures and publication of the Regional Spatial Economic Strategy for the area, it is considered prudent to base calculations on the number of housing units required which subsequently ensures population growth.

Fingal County Council is currently engaged with the Dublin Housing Supply and Co-Ordination Task Force in response to the current Dublin Housing crisis. As part of this engagement Fingal County Council are in the process of identifying necessary infrastructure to facilitate the release of strategic land banks for housing in response to this crisis. In light of this work and having regard to the submission by the Department of Housing, Planning, Community and Local Government on the matter, Dunsink is identified as a potential development solution given its long term development potential in proximity to public transport services proximate to Dublin City Centre. The Council is committed to carrying out a feasibility study within 24 months of the adoption of the new Development Plan that will examine and identify the infrastructure requirements required to ensure that this strategic landbank can be developed to its full potential.

Similarly, Lissenhall provides development potential in the Swords area (identified as a key town in the Regional Settlement Hierarchy) which is an attractive location for the delivery and purchase of housing in recent times. The development of the Lissenhall lands is dependent on the provision of a Local Area Plan, the delivery of adequate water services (Swords WWT) and upgraded/planned public transport infrastructure (Metro North as outlined in the Governments Infrastructure and Capital Investment Plan 2016-2021). This is envisaged over a longer term horizon and on an incremental, phased basis in line with the sequential development of Swords.

The zonings at Lissenhall provide for the planned growth and development of Swords and its surrounding hinterland over a medium and long term basis. It enables the Local Authority to

## PART TWO

---

respond in a measured way to the ongoing housing crisis and provides a solution for long term sustainability in tackling the issue as opposed to a reactive response when faced with housing dilemmas in the Dublin area. This, in tandem with the delivery of public transport infrastructure including Metro North, elevates the sustainability of lands at Lissenhall in terms of appropriateness and necessity for future development purposes.

The Guidance Note on Core Strategies distributed to Local Authorities under Circular Letter PSSP6/2010 sets out that 'apart from Regional Planning Guidelines for the Greater Dublin Area, the RPG housing figures ... have already taken account of the headroom requirements (of up to 50% extra over actual predicted land/unit requirements) specified in the Planning Guidelines on Development Plans; therefore, no further headroom capacity should be provided in development plan zoning outside of the seven planning authorities in the GDA'. Section 4 of the above Planning Guidelines on Development Plans sets out that 'planning authorities should take all reasonable steps to ensure that sufficient zoned residential land is available throughout the lifetime of the development plan and beyond to meet anticipated needs and allow for an element of choice. In particular, to ensure continuity of supply of zoned residential land, planning authorities should ensure that at the time they make a development plan, enough land will be available to meet residential needs for the next nine years. In this way, development plans will provide for sufficient zoned land to meet not just the expected demand arising within the development plan period of six years, but will also provide for the equivalent of 3 years demand beyond the date on which the current plan ceases to have effect'. The housing figures in the Draft Plan are based on a calculation of the population requirement over an additional three years from that of the Plan period (equivalent of 3 years demand beyond the date on which the current plan ceases to have effect) and is intended to cater for the longer term development of the County. The reservation of lands at Lissenhall, situated within the Metropolitan Area, accounts for the majority of this headroom allocation. It is considered that the above should be acknowledged in the context of the headroom allocation under the Plan (see proposed text before Table 2.8 in response to Department of Housing, Planning Community and Local Government submission).

In accordance with the Regional Planning Guidelines, any large designation of new housing lands expanding the current footprint of the Metropolitan area should be directly linked to provision of planned and committed, existing or upgraded high quality rail based public transport services. By identifying Lissenhall as a key future development area, the Council is seeking to maximize the opportunities created by the delivery of key strategic infrastructure (Metro North) in accordance with the RPGs, best planning practice and the principles of sustainable development.

The development of lands at Lissenhall will only be considered as part of a phased development approach. Further, such development will only be considered over a longer term horizon and in the context of the prioritisation of sequential development in the Swords area. To ensure that such an approach is taken, the following provision has been included at Section 4.2 of the Draft Plan in respect of Lissenhall, "The Plan will also promote lands at Lissenhall, through the preparation of a Local Area Plan, to provide for the longer term strategic development of the area to provide for the long term development in Swords as required. It is envisaged that in the long term this area, subject to infrastructural improvements, could in the future accommodate the development of a planned sustainable mixed use urban district providing for a significant level of employment and residential development". It is proposed that an additional statement be included above in recognition of the need to consider the development of these lands in the context of the future development of Swords.

# PART TWO

---

The exact phasing programme of these lands will be determined as part of a dedicated LAP for the area. This will include a clear emphasis on prioritisation of sequential development that will ensure the sustainability of Swords and its hinterland. Indeed Objective SWORDS 26 has been included in the Draft Plan which reinforces the need to consider the release of Lissenhall in the context of the development of Swords by committing to “prepare a Local Area Plan for lands at Lissenhall (Refer to Map Sheet No. 8 LAP 8.A) to provide for the longer term strategic development of the area as a planned sustainable mixed use urban district, physically and functionally integrated with Swords. The Local Area Plan will assess and determine the sequencing and phasing of development subject to the delivery of the necessary infrastructure, proposed new Metro North and its potential extension. The Local Area Plan will assess and determine the appropriate scale and mix of uses of employment, residential and supporting community and retail facilities. The Local Area Plan lands will be subject to a detailed flood risk assessment to address potential flood risk, proposed mitigation measures and assign appropriate land uses. The Local Area Plan will take note of potential noise pollution from road, rail and motorway traffic and implement measures to address any issues that may cause annoyance to potential residents”.

Acknowledging the upcoming review of the Regional Spatial and Economic Strategies and in consideration of the above, it is also recommended that a policy be included in the Plan which acknowledges the interim nature of the current Core Strategy and commits to its revision and update pending the adoption of any future RSES (see policy inclusion under Chapter 2 Core Strategy).

## **Placemaking:**

The positive recognition of the Plans contribution to placemaking is welcomed.

## **Urban & Rural Fingal:**

The rationale for the inclusion of lands at Dunsink and Lissenhall is set out at Core Strategy and Settlement Strategy' above.

The comments in relation to the rationalisation of Local Area Plans, Master Plans and Urban Framework Plans are recognised. The existing Fingal Development Plan outlines a range of planning documents for different areas. These include Local Area Plans, Urban Centre Strategies, Urban Centre Studies, Masterplans, Landscape Masterplans, Recreational Strategies, Gateway Strategies, Management Plans and Feasibility Studies. The Draft Fingal Development Plan proposes to rationalize and make consistent the type of planning documents which will be produced in the future. The Draft Fingal Development Plan identifies a number of areas where Masterplans or Urban Framework Plans will be undertaken. These plans are intended to be a tool which engages public participation at a local level in order to achieve quality in urban design for future development in their areas. These plans are subsidiary to their parent plan (i.e. Local Area Plan, County Development Plan) and their associated zoning strategies and objectives.

There has been a rationalisation in terms of the requirement for Local Area Plans in the County under the Draft Plan, with a reduction from 42 to 19. In line with the Local Area Plan Guidelines for Planning Authorities local area plans focused on meeting the needs of communities in newly developing areas, will place an emphasis on:

- providing compact, walkable neighbourhoods incorporating a variety of house types with mixed tenure;
- providing conveniently-located neighbourhood facilities commensurate with projected population, including playground/play areas;

## PART TWO

---

- providing a mix of residential and commercial uses with adequate local employment opportunities;
- designing in active streets and designing out anti-social behaviour through urban masterplanning, encouraging good mixture of uses and adaptability of buildings;
- incorporating measures to encourage local people to adopt healthier, smarter ways to travel around their local communities, especially walking and cycling.

### **Economic Development:**

The support of the recognition of Fingal as a key authority for driving economic development in the Eastern and Midland Regional Assembly is welcomed.

The current Economic Strategy for Fingal seeks to ensure that there is a sufficient supply of zoned and serviced lands at suitable locations to accommodate future demand for enterprise and employment investment across a diverse range of sectors. The strategy also seeks to strengthen the alignment between employment, population and transport services. The County Development Plan seeks to guide enterprise and employment development to appropriate locations by identifying strategic economic areas, encouraging clusters and setting out policies and objectives for the future development of these areas.

Having regard to the extent of these lands which are available for enterprise and employment within the County and the extent of realistic development potential of said lands during the Plan period, it is considered that the quantum of lands zoned for enterprise and employment uses are reasonable and appropriate to meet the employment needs for the County at this time.

It is considered reasonable that a policy be included in the Plan which acknowledges the merit for the preparation of an employment study for the County.

The reclassification of the towns of Donabate, Lusk and Rush to level 3 status as part of the Retail Strategy was proposed under the Draft Plan to align with the 'Moderate Growth Town' status defined for these settlements as part of the RPGs. It is considered that these towns effectively function as Moderate Growth Towns with higher performing urban centres and in this regard the retail status of these towns should reflect this. That said, it is acknowledged that these towns are designated at level 4 in the retail hierarchy as set out in the GDA Retail Strategy 2008-2016 and accordingly, it is recommended that they be reclassified to reflect this in the final Plan. A policy should however be included to review the promotion of Donabate, Lusk and Rush as Level 3 Major Town Centres as part of any future revised Retail strategy for the GDA.

The NSS favours the physical consolidation of Dublin's Metropolitan Area as an essential requirement for a competitive Dublin. It seeks to sustain Dublin's role as the engine of the national economy and seeks to bring people, employment and services closer together to create a better quality of life, less congestion, reduced commuting distances, more regard to the quality of the environment and increased access to services like health, education and leisure. In this regard Lissenhall is a key strategic location for enterprise and employment within the Metropolitan Area of Dublin with the potential to strengthen the alignment between employment, population and future transport services (upon which said lands is dependent i.e. Metro North as outlined in the Governments Infrastructure and Capital Investment Plan 2016-2021).

# PART TWO

---

## **Movement and Infrastructure:**

The support of the Assembly in terms of additional infrastructure capacity requirements is welcomed, as is the support of policies in relating to the importance of nationally and regionally significant infrastructure including Metro North and Dublin Airport.

Objective SW07 requires the implementation of the Planning System and Flood Risk Management Guidelines. Specific areas which will require further investigations are highlighted. All these areas also subject to a LAP or Masterplan which will address all potential sources of flood risk and demonstrate compliance with the aforementioned guidelines.

## **Green Infrastructure:**

The recognition and support of proposals in terms of Green Infrastructure is welcomed.

## **Natural and Cultural Heritage:**

The support of policies to protect the natural and cultural heritage in Fingal is welcomed.

## **Land Use Zoning Objectives:**

See response as set out under Urban & Rural Fingal.

## **Development Management Standards:**

The support of Development Management policies is welcomed.

## **SEA & AA:**

See SEA Response.

## **Chief Executive Recommendations:**

### **CE EMRA 1.1:**

See proposed text before Table 2.8 in response to Department of Housing, Planning Community and Local Government submission.

### **CE EMRA 1.2:**

See proposed text at '2.6 Housing Land Capacity under the 2011-2017 Development Plan' in response to Department of Housing, Planning Community and Local Government submission.

### **CE EMRA 1.3:**

See proposed text after paragraph 3, Section 4.2 in response to Department of Housing, Planning Community and Local Government submission.

### **CE EMRA 1.4:**

*To review the Fingal Housing Strategy having regard to the provisions of any future Regional Spatial and Economic Strategy (RSES) prepared by the Eastern and Midlands Regional Assembly for its area.*

# PART TWO

CE EMRA 1.1: Table 6.1: Fingal Retail Hierarchy.

Retailing Level	Urban Centre Location	Zoning Objective	Types of Services	Appropriate Retail Format
Level 3: Town Centres	Balbriggan Malahide Skerries Charlestown Donabate Lusk Rush	Major Town Centre 'MC' Town Centre 'TC'	Level 3 Centres will vary in terms of scale of provision and the size of catchment based on their proximity to a Level 2 Centre. Generally where the centre has a large catchment (such as Balbriggan) and is not close to a major town centre, there should be a good range of comparison shopping (though no large department store), with a mix of uses and services, some leisure activities and a range of cafes and restaurants. At least one supermarket and a smaller scale department store may be required to meet local needs. Where the Level 3 Centre is close to an existing major town centre, the scale of retail and mixed use provision should be lower, with the proposed range of shops meeting more basic day to day needs, with only small scale range of comparison units trading. Level 3 Centres should generally cater for a population of between 10,000 and 40,000 people.	Middle Order Comparison Lower Order Comparison Superstore Supermarket
Level 4: Small Towns and Village Centres; and Local Centres	Blanchardstown Village, Mulhuddart, Clonsilla, Castleknock, Howth, Portmarnock, Baldoye, Ongar, Sutton, Balrothery Applewood, Stapolin, Racecourse, Santry Demesne, Bayside, Castlemills, Carrickhill, Tyrellstown,	Town Centre 'TC' Local Centre 'LC'	Level 4 Centres should generally provide for one supermarket ranging in size from 1,000-2,500 sq m with a limited range of supporting shops (low order comparison), supporting services, community facilities or health clinics grouped together to create a focus for the local population. This level of centre should meet the everyday needs of the local population and surrounding catchment.	Lower Order Comparison (limited to a small number of shops meeting local needs) Supermarket

# PART TWO

Retailing Level	Urban Centre Location	Zoning Objective	Types of Services	Appropriate Retail Format
	Donabate Lusk Rush Roselawn and Rathbeale			

## **CE EMRA 1.5:**

Before Objective ED01

*The Council will endeavour to continually review its employment strategy in order to ensure the allocation of sufficient quantum's of and types of lands for employment in urban and rural areas in line with the settlement hierarchy.*

## **CE EMRA 1.6:**

After Objective ED35

*As part of any future review of the Retail Planning Guidelines for the GDA, the Council shall seek to align the retail designation of Donabate, Lusk and Rush as Level 3 Major Town Centres to reflect the status of these settlements as Moderate Growth Towns, as defined by the RPGs.*

## **CE EMRA 1.7:**

Statement at 11.3 Masterplans.

*These plans are subsidiary to their parent plan (i.e. Local Area Plan, County Development Plan) and their associated zoning strategies and objectives.*

## **CE EMRA 1.8:**

See proposed update to 'Chapter 4 Urban Fingal, Objective 12 Blanchardstown, in response to Department of Housing, Planning Community and Local Government submission.

# PART TWO

## National Transport Authority (NTA) Submission:

### Summary of Issues

#### **Overview:**

The Authority supports the policies and objectives set out in the draft Development Plan, which align with the principles of the Transport Strategy, and will ensure that growth in Fingal is planned in an integrated and sustainable manner.

Under section 11 of the Dublin Transport Authority Act, 2008, a principal function of the Authority is to 'secure the provision of public transport infrastructure'. In line with this function, it is the role of the Authority to develop and coordinate the implementation of new public transport infrastructure.

#### **Reference to 'National Transport Authority'**

Under section 11 of the Dublin Transport Authority Act, 2008, a principal function of the Authority is to 'secure the provision of public transport infrastructure'. In line with this function, it is the role of the Authority to develop and coordinate the implementation of new public transport infrastructure. In this regard, the Authority requests that any reference to the development of new, or modifications to existing, public transport infrastructure references the 'National Transport Authority' as the statutorily responsible body. The Authority request the Draft Plan be reviewed and revised to ensure that the 'National Transport Authority' is identified as the body responsible for the provision of public transport infrastructure.

#### **New Metro North**

The process of planning and design for this project has now commenced. Part of that process will be the detailed consideration of various alignments and stop locations through the overall corridor, with the intention of optimising the final layout. For that reason it is suggested that the alignment for new Metro North shown on Sheet No. 8 and on Sheet No. 11, which is currently labeled as "New Metro North Route" be relabeled as "Indicative Route for new Metro North". In addition, the reference to TII in Objective MT13 should be amended to "NTA and TII".

Objective MT14 advocates support for a possible future extension of the new Metro North project to link with the Northern Rail Line in Donabate. It should be noted that this proposed extension has not been included in the Transport Strategy, which sets out the framework for transport provision across the Greater Dublin Area to 2035. Accordingly, the Authority recommends that Objective MT14 is removed from the Development Plan.

In addition, it is noted that the alignment for new Metro North shown in Sheet 8 extends to Lissenhall. While it is proposed that the map legend be changed to "Indicative Route for new Metro North" it is also recommended that the indicative route terminates at Estuary Roundabout in line with the Fingal/North Dublin Transport Study.

#### **Metro West**

The Transport Strategy sets out the programme for investment in strategic transport across the GOA to 2035. Metro West has not been included in the Transport Strategy, and as such it is not seen as a strategic transport priority for the Greater Dublin Area over the next 20 years. The Authority recommends that this section, including Objective MT15, is removed from the draft Development Plan.

# PART TWO

## General References to the Transport Strategy

The Transport Strategy now represents the principal policy context for transportation planning in the Greater Dublin Area. In this regard, the Authority recommends that the Transport Strategy is specifically referenced in Chapter 7: Policy Context alongside 'Building on Recovery: Infrastructure and Capital Investment, The National Spatial Strategy and The Regional Planning Guidelines for the Greater Dublin Area'. In addition, specific references should be cross checked to ensure consistency. Also, any reference within the document to draft Transport Strategy, should be replaced with Transport Strategy, in light of its approval by the Minister of Transport, Tourism and Sport.

## Use of 'Masterplans'

It is critical for the sustainable long term development of both Fingal and the Greater Dublin Area that significant land use development is planned, and supported by an appropriate level of analysis. This will ensure that the development proposals are appropriate, consistent with statutory planning policy (including transport policy), and will complement existing and future infrastructural provision. In this regard, the Authority would stress the need to ensure that development planning is coordinated by the Local Authority in conjunction with relevant third parties, such as the NTA, TII, and Irish Water etc.

The Authority note Department of Housing, Planning Community and Local Government Local Area Plan Guidelines and the Department of Housing, Planning Community and Local Government Sustainable Residential Development in Urban Areas Guidelines advice in relation to non- statutory 'Masterplans'. In this context, the Authority accepts the use of such non- statutory plans as an aid to development planning – at non- strategic development locations. At locations of strategic importance, however, the Authority suggests that only statutory plans should be used to guide development to ensure that the planning of strategic locations is undertaken in a transparent and coordinated manner, with full consultation and direct input from the statutory Authorities.

Therefore, the Authority does not support the use of Masterplans for strategic development sites, adjacent or in the vicinity of strategic public transport routes, in particular within the catchment of the proposed new Metro North corridor, and other primary public transport corridors. Specifically, the proposed planning approach used at the following locations should be reconsidered:

- Map Sheet 8- Master Plan Objective 8A
- Map Sheet 8- Master Plan Objective 8B
- Map Sheet 8- Master Plan Objective 8C
- Map Sheet 8- Master Plan Objective 8D
- Map Sheet 8- Master Plan Objective BE
- Map Sheet 8- Master Plan Objective 8F
- Map Sheet 8- Master Plan Objective 8G
- Map Sheet 11- Master Plan Objective 11A
- Map Sheet 11- Master Plan Objective 11D
- Map Sheet 13- Master Plan Objective 13A

Due to the size, and location adjacent to the strategic road network, the Authority would also question the use of Masterplans for the following sites:

- Map Sheet 4- Master Plan Objective 4C
- Map Sheet 7- Master Plan Objective &A
- Map Sheet 11- Master Plan Objective 11B
- Map Sheet 11- Master Plan Objective 11C

# PART TWO

---

- Map Sheet 12- Master Plan Objective 12A

## **Lissenhall, Swords**

The Authority acknowledges the proposal to prepare a Local Area Plan for the lands zoned at Lissenhall. Given the quantum of zoned land, it is critical that phasing and delivery of land use is carefully planned, and linked to the build out of public transport. The Authority recommends that an additional objective is included in Chapter 2 of the Development Plan to state that future development within the Lissenhall LAP lands will be phased, and comply with the strategic and local planning principles outlined in Chapter 7 of the Transport Strategy.

## **Road Schemes**

The Authority notes the road schemes put forward in the draft Development Plan. Although it is acknowledged that local road improvements will be required, it is critical that the road network is built out and managed in a coordinated and planned manner, across the GDA. In this regard, the Authority suggests that the plan provides that any future road proposal is assessed against the criteria set out in Section 5.8.3 of the Transport Strategy. The Authority recommends the Development Plan references Section 5.8.3 'Principles of Road Development' of the Transport Strategy in objective MT28 of the draft Development Plan.

## **Strategic Road Network**

It is critical that the capacity and efficiency of the existing strategic road network, including junctions, is preserved. The strategic road network is an integral part of the overall provision of transport within the GDA, and it is vital that capacity is reserved for strategic traffic movement, including freight movement. The Transport Strategy states that 'the strategic transport function of national roads, including motorways, will be protected by the full implementation of the Department of Housing, Planning Community and Local Governments (DOHPCLG) guidelines on 'Spatial Planning and National Roads- Guidelines for Planning Authorities'. The Authority recommends that Chapter 7 of the Development Plan incorporates this policy, and that any new development in the vicinity of the strategic road network shall be assessed in accordance with the policy and objectives set out in the Department of Housing, Planning Community and Local Government guidelines on 'Spatial Planning and National Roads'.

## **Parking Control**

The supply and management of parking at destinations is central to the management of travel demand. The Authority attaches critical importance to the need to manage parking, particularly in relation to workplace parking, and in this regard would be concerned that Objective MT04 could be misinterpreted as a requirement to provide 'long term parking within a reasonable distance for employees'. The Authority request that this objective is clarified.

## **Dublin Airport**

The Authority views Dublin Airport as a strategic International Gateway, both in terms of the GDA and the country. It is critical that the primary function of the Airport as a Gateway is maintained, and that access to and from the airport is carefully managed to ensure that the strategic role of the Airport is not undermined by local transport problems. The Authority welcomes the proposal in the draft Development Plan to prepare a Local Area Plan for the Airport and environs. To ensure that the primary function of the Airport is preserved, the Authority suggests that Objective ED31 is amended to emphasise the importance of protecting the operational function of the airport, rather than ensuring the appropriate balance is achieved.

## **Sustainable Transport -Cycling**

In relation to cycling infrastructure, the Authority suggests that the policies set out in the

# PART TWO

---

Development Plan could be strengthened. In relation to Cycle Parking, the Authority suggests that the Walking and Cycling Section is broadened to better reflect the quality of facilities required to make cycling an attractive travel option to work and education. The Authority also recommends that a policy is included in the Development Plan which states that new/retrofitted cycle infrastructure within the county will be designed in line with the preferred approaches outlined in the NTA's National Cycle Manual. Furthermore, the Authority recommends the inclusion of more prescriptive details of what types of cycle infrastructure should be provided.

## **Chief Executive's Response:**

### **Overview:**

The positive support of the Draft Plan is recognised.

### **Reference to 'National Transport Authority'**

To ensure that the Development Plan accurately represents the legislative role of the Authority, it is appropriate that the National Transport Authority is identified as the body responsible for the provision of public transport infrastructure.

### **New Metro North**

The relabeling of the Metro North route is acceptable, as is the reference to the TII in MT 13.

Objective MT14 supports a possible future expansion of Metro North. While it recognizes this is not included in the Transport Strategy, it is a longer term aim of the Council and should remain within the Draft Plan.

Likewise, the Council advocates the extension of new Metro North to Lissenhall and this is indicated on Sheet 8. This element of the alignment is differentiated on Sheet 8, as the "Proposed Indicative Metro Route" which is distinct from the "New Metro North Route" which terminates at Estuary Roundabout.

### **Metro West**

While Metro West has not been included in the Government's capital programme 2016 -2021, a significant amount of preliminary design work has already been carried out. Although the exact route has not been approved, it is prudent to maintain a corridor free from development to facilitate the delivery of a light rail transit system in the future. It is recommended the corridor should be protected.

### **General References to the Transport Strategy**

To ensure the Development Plan is consistent with the Transport Strategy, the Transport Strategy will be referenced throughout as the principal regional transport policy document.

### **Use of 'Masterplans'**

The existing Fingal Development Plan outlines a range of planning documents for different areas. These include Local Area Plans, Urban Centre Strategies, Urban Centre Studies, Masterplans, Landscape Masterplans, Recreational Strategies, Gateway Strategies, Management Plans and Feasibility Studies. The Draft Fingal Development Plan proposes to rationalize and make consistent the type of planning documents which will be produced in the future. There are 42 no. Local Area Plans identified in the Fingal Development Plan, 2011 - 2017. The Draft Fingal Development Plan identifies 19 no. This is significantly less.

## PART TWO

---

The Draft Plan gives a statutory framework to all proposed plans and strategies through a number of objectives. These objectives give the proposed plans and strategies the necessary statutory context. Objectives PM08, 09, 10, 14, 15 & ED84, 85, 86, 88, 93, 94, 97 & 100)

The decision as to whether to prepare a local area plan in a sub-threshold context or include specific objectives in a development plan is a matter for the planning authority. However, such a decision would normally take on board criteria such as the degree to which major development is anticipated such as to justify the preparation of a standalone local area plan, the resource implications and the need to focus resources in using the local area plan process for areas where major alterations to the built environment are anticipated.

Masterplans will be prepared by the Council to give guidance on specific development proposals working within the relevant development plan or local area plan parameters. As long as such documents work within defined policy and objective parameters of the relevant plan and do not set new policies or objectives outside the statutory process for defining such content, their usage is both appropriate and complementary to the Development Plan.

From the non-statutory background data gathering process to the statutory process as set out in the legislation with its various elements of statutory notices, issues papers, draft, amended draft and final documents, the preparation of a Local Plan is an extremely resource intensive process on the Planning Department. Within this context, and having regard to the discretion available to the Planning Authority in deciding on the appropriateness of applying the requirement for a Local Area Plan or a Masterplan, the Draft Plan has sought the requirement for a Masterplan on certain lands where it is considered that the same vision and objectives can be achieved in a more efficient and expedient manner than applying the formal Local Area Plan process.

The preparation of Masterplans will assist in achieving quality developments in terms of, inter alia, urban design, structure, delivery of infrastructure and community/amenity facilities and permeability. The Draft Fingal Development Plan identifies key sites that will require the preparation of approved Masterplans and subsequent planning applications will be required to adhere to the approved Masterplans. Masterplans will be subject to a public consultation process and engagement with the relevant stakeholders, including the TII and the NTA. The Planning Authority considers Masterplans as an effective means of guiding new development and providing essential social and infrastructure in a phased and sustainable manner.

In the context of concerns raised and to ensure a robust assessment of implications of such plans on strategic infrastructure, it is considered appropriate to include an objective to prepare a study for the South Fingal area.

### **Lissenhall, Swords**

Lissenhall provides development potential in the Swords area (identified as key town in the Regional Settlement Hierarchy) which is an attractive location for the delivery and purchase of housing in recent times. The development of the Lissenhall lands is dependent on the provision of a Local Area Plan, the delivery of adequate water services (Swords WWT) and upgraded/planned public transport infrastructure (Metro North as outlined in the Governments Infrastructure and Capital Investment Plan 2016-2021). This is envisaged over a longer term horizon and on an incremental, phased basis in line with the sequential development of Swords.

Objective Swords 26 states the Local Area Plan for Lissenhall will assess and determine ***the sequencing and phasing of development*** subject to the delivery of the necessary infrastructure, proposed new Metro North and its potential extension.

# PART TWO

---

No changes are required.

## **Road Schemes**

To ensure that the Fingal County Development Plan is consistent with the Transport Strategy and the development of new road infrastructure is undertaken in a planned and coordinated fashion, it is recommended that the Development Plan specifically references Section 5.8.3 'Principles of Road Development' of the Transport Strategy in objective MT28 of the draft Development Plan.

## **Strategic Road Network**

To ensure the Development Plan is consistent with the Transport Strategy, and that the strategic road network is maintained, managed and operated appropriately, it is recommended an objective is included in Chapter 7 of the Plan, stating the strategic transport function of national roads, including motorways, will be protected by the full implementation of the DoELCG guidelines on 'Spatial Planning and National Roads- Guidelines for Planning Authorities'.

## **Parking Control**

The supply and management of parking at destinations is central to the management of travel demand. The requirement for long term parking within a reasonable distance for employees is to discourage such parking in commercial centres. To avoid misinterpretation, Objective MT04 will be reworded.

## **Dublin Airport**

Objective ED31 seeks to protect the core function of the airport. It is considered the existing text adequately addresses this. No changes are required.

## **Sustainable Transport -Cycling**

The policies and objectives relating to cycling promote cycling as a sustainable mode of transport and the Council will work with the NTA to implement the Greater Dublin Area Cycle Network Plan.

## **Recommendations:**

### **Reference to 'National Transport Authority'**

#### **CE NTA 1.1:**

Amend Objectives MT13, 14 and 18 to make reference to the NTA.

#### **New Metro North**

##### **CE NTA 1.2:**

Amend new Metro North route to "Indicative Route for new Metro North".

#### **Metro West**

##### **CE NTA 1.3:**

Replace reference to Metro West to "Light Rail Corridor".

### **General References to the Transport Strategy**

#### **CE NTA 1.4:**

Refer to the Transport Strategy throughout Section 7.1.

# PART TWO

---

## Road Schemes

### CE NTA 1.5:

Amend Objective MT28 to make reference to Section 5.8.3 'Principles of Road Development' of the Transport Strategy, where practical.

Seek to implement the road improvement schemes indicated in Table 7.1 within the Plan period, subject to assessment against the criteria set out in Section 5.8.3 of the NTA Transport Strategy for the GDA, where appropriate, and where resources permit. Reserve the corridors of the proposed road improvements free of development.

## Strategic Road Network

### CE NTA 1.6:

Include a new objective to state:

#### Objective MTXX

Protect the strategic transport function of national roads, including motorways through the implementation of the DoELCG guidelines on 'Spatial Planning and National Roads- Guidelines for Planning Authorities'.

## Parking Control

### CE NTA 1.7:

Amend Objective MT04 to state:

Control on-street parking in the interests of the viability, vitality and amenity of commercial centres by maximising the supply of short stay parking for shoppers, while providing appropriate levels of long- term parking within a reasonable distance for employees.

## Use of 'Masterplans'

### CE NTA 1.8

Include a new objective after MT02

*Carry out a comprehensive feasibility study of the South Fingal area to advise on a strategic 'vision' and overall strategy for the proper planning and sustainable development of the study area. This will be carried out in consultation with necessary statutory agencies and relevant stakeholders.*

Insert Study Area boundary on Sheet 11.

# PART TWO

## Department of Housing Planning, Community and Local Government (DoHPCLG)

Having regard to the nature of issues raised in the submission by the Department of Housing Planning Community and Local Government (DoHCPLG) and the extent to which the issues raised therein have implications for the remaining submissions in this area, the submission has been dealt with individually for the purpose of this report (although not required under the Act).

### **Summary of issues raised.**

#### **Introduction:**

The submission considers the Draft County Development Plan 2017-2023 to be a well-structured overall framework for the proper planning and sustainable development of Fingal, which gives spatial expression to the economic, social, cultural and environmental aims of the County.

#### **Core Strategy:**

The Department notes that the core strategy is generally in line with the Regional Planning Guidelines for the Greater Dublin Area (GDA). Recommendations are however set out to clearly distinguish the allocation of population throughout the County between the metropolitan area and the hinterland. It is also recommended that further clarification be given to demonstrating the allocation of headroom throughout the county.

#### **Housing and Active Land Management:**

The Department acknowledges the initiatives of Fingal County Council to enhance the viability of new build. Detailed comments are set out regarding the Government policy in relation to housing supply and the complexity of this issue. Housing supply targets set out in the Draft Plan are appropriate from a regional perspective however Departmental analysis points to the fact that economic viability of new build, given new lending and development finance requirements is a significant barrier to commencements.

Consideration to enhancing the provision of the plan as regards the concept of Active Land Management and the support for the work of the Housing Supply Task Force is set out. In this regard it is submitted that Dunsink should be further considered in terms of identifying the practical steps needed to support the future development of these strategic lands. Further consideration is suggested to be given to the phasing and extent of zoning of Lissenhall lands in the context of the development of Swords.

#### **Housing and Regeneration Act 2015:**

Further detailed consideration needs to be given to the development plan's role in supporting implementation of the Housing and Urban Regeneration Act 2015.

#### **Housing Strategy:**

The submission recognises changes made to Part V regarding the provision of social housing and mechanisms to deliver social housing. Also the statutory function of the new EMRA to prepare a Regional Spatial and Economic Strategy (RSES) for its area is also identified. In this regard, the submission recommends that the Housing Strategy be considered interim in nature, with a review to be undertaken within two years of the updated RSES as part of the mandatory 2 year report on the progress of the Development Plan under section 15 (2) of the Act.

# PART TWO

---

## **Retail Development:**

The submission notes the Plans contribution the creation of a vibrant and successful retail sector. The submission notes that Donabate, Lusk and Rush are categorised as level 3 centres however they are identified as level 4 in the Retail Strategy for the GDA. It is recognised that there may be rationale for these centres re-categorisation, the submission requests that they revert to that contained in the GDA retail strategy pending a review of this strategy following the preparation and adoption of the RSES.

## **Movement and Transport:**

The Departments submission notes and fully endorses that the Draft Plan supports two key transport infrastructure proposals, Metro North and the second runway at Dublin Airport, which are in line with national transport and aviation policies.

## **Flooding and Flood Risk Assessment:**

Appendix A of the revised 'Strategic Flood Risk Assessment' includes the application of the Justification Test to relevant lands in the Plan and the Planning Authority must demonstrate that the development plan is consistent with these requirements.

It is requested that full account to be taken of any observations made by the Eastern and Midlands Regional Assembly, OPW, Dept of Arts, Heritage and the Gaeltacht, National Parks and Wildlife, EPA and Irish Water.

## **Chief Executive's Response:**

### **Introduction:**

The positive recognition of the Core Strategy as being generally in line with the Regional Planning Guidelines for the GDA is welcomed.

The Department of Housing, Planning Community and Local Government submission is welcomed and the issues raised are acknowledged by the Council. It is proposed to incorporate a number of recommendations raised under this submission as part of the final Plan.

### **Core Strategy:**

The Draft Plan has significantly realigned the distribution of future projected population growth between the metropolitan area and hinterland. Table 2.8 sets out a breakdown of future projected population growth between the areas with 81% of potential residential development allocated to the metropolitan area and 19% allocated to the remaining hinterland area. In this regard there has been a substantial shift in allocation of population towards the metropolitan area from that of the current Development Plan. In addition the headroom provided for has been distributed in order to consolidate growth for the Metropolitan Area (any future designation of lands at Dunsink as discussed below will further lead to the consolidation of growth targeted to the Metropolitan Area).

The Guidance Note on Core Strategies distributed to Local Authorities under Circular Letter PSSP6/2010 sets out that 'apart from Regional Planning Guidelines for the Greater Dublin Area, the RPG housing figures ... have already taken account of the headroom requirements (of up to 50% extra over actual predicted land/unit requirements) specified in the Planning Guidelines on Development Plans; therefore, no further headroom capacity should be provided in development plan zoning outside of the seven planning authorities in the GDA'. Section 4 of the above Planning Guidelines on Development Plans sets out that 'planning authorities should take all reasonable steps to ensure that sufficient zoned residential land is available throughout the lifetime of the development plan and beyond to meet anticipated needs and allow for an

## PART TWO

---

element of choice. In particular, to ensure continuity of supply of zoned residential land, planning authorities should ensure that at the time they make a development plan, enough land will be available to meet residential needs for the next nine years. In this way, development plans will provide for sufficient zoned land to meet not just the expected demand arising within the development plan period of six years, but will also provide for the equivalent of 3 years demand beyond the date on which the current plan ceases to have effect'. The housing figures in the Draft Plan are based on a calculation of the population requirement over an additional three years from that of the Plan period (equivalent of 3 years demand beyond the date on which the current plan ceases to have effect') and is intended to cater for the longer term development of the County. The reservation of lands at Lissenhall, situated within the Metropolitan Area, accounts for the majority of this headroom allocation. It is considered that the above should be acknowledged in the context of the headroom allocation under the Plan.

### **Housing and Active Land Management:**

The Council welcomes the Departments recognition of the work carried out under the Plan to enhance viability of new build. Similarly, the appreciation of the Councils attention to the issues at hand and approach adopted to dealing with the issue is also welcomed.

The support of the Dublin Housing Supply and Co-Ordination Task Force is recognised as being important in responding to the current Dublin Housing crisis. Fingal County Council will engage with the Task Force to ensure that existing stock is utilised more efficiently and support the identification of necessary infrastructure to facilitate the release of strategic land banks for housing. Recognition of the role of the Task Force should be included in the Plan.

The economic viability of providing new housing is recognised and it is considered appropriate that a policy should be included which supports the concept of Active Land Management through the identification of key strategic sites zoned for housing, their stage in progression to development and measures which can be included to facilitate their release in the event of local supply failure. Policy supporting this concept should be inserted in the Plan.

Lissenhall provides development potential in the Swords area (identified as a key town in the Regional Settlement Hierarchy) which is an attractive location for the delivery and purchase of housing in recent times. The development of the Lissenhall lands is dependent on the provision of a Local Area Plan, the delivery of adequate water services (Swords WWT) and upgraded/planned public transport infrastructure (Metro North as outlined in the Governments Infrastructure and Capital Investment Plan 2016-2021). This is envisaged over a longer term horizon and on an incremental, phased basis in line with the sequential development of Swords.

In accordance with the Regional Planning Guidelines, any large designation of new housing lands expanding the current footprint of the Metropolitan area should be directly linked to provision of planned and committed, existing or upgraded high quality rail based public transport services. By identifying Lissenhall as a key future development area, the Council is seeking to maximize the opportunities created by the delivery of key strategic infrastructure (Metro North) in accordance with the RPGs, best planning practice and the principles of sustainable development. In the context of population/housing unit projections it should be noted that Hansfield SDZ has been considered as part of the Core Strategy calculations in the context of providing an overall population projection for the County, however, the inclusion of these lands is not necessary for the purpose of Core Strategy projections.

The zonings at Lissehall provide for the planned growth and development of Swords and its surrounding hinterland over a medium and long term basis. It enables the Local Authority to

# PART TWO

---

respond in a measured way to the ongoing housing crisis and provides a solution for long term sustainability in tackling the issue as opposed to a reactive response when faced with housing dilemmas in the Dublin area. This, in tandem with the delivery of public transport infrastructure including Metro North, elevates the sustainability of lands at Lissenhall in terms of appropriateness and necessity for future development purposes.

The development of lands at Lissenhall will only be considered as part of a phased development approach. Further, such development will only be considered over a longer term horizon and in the context of the prioritisation of sequential development in the Swords area. To ensure that such an approach is taken, the following provision has been included at Section 4.2 of the Draft Plan in respect of Lissenhall, "The Plan will also promote lands at Lissenhall, through the preparation of a Local Area Plan, to provide for the longer term strategic development of the area to provide for the long term development in Swords as required. It is envisaged that in the long term this area, subject to infrastructural improvements, could in the future accommodate the development of a planned sustainable mixed use urban district providing for a significant level of employment and residential development". It is proposed that an additional statement be included above in recognition of the need to consider the development of these lands in the context of the future development of Swords.

The exact phasing programme of these lands will be determined as part of a dedicated LAP for the area. This will include a clear emphasis on prioritisation of sequential development that will ensure the sustainability of Swords and its hinterland. Indeed Objective SWORDS 26 has been included in the Draft Plan which reinforces the need to consider the release of Lissenhall in the context of the development of Swords by committing to "prepare a Local Area Plan for lands at Lissenhall (Refer to Map Sheet No. 8 LAP 8.A) to provide for the longer term strategic development of the area as a planned sustainable mixed use urban district, physically and functionally integrated with Swords. The Local Area Plan will assess and determine the sequencing and phasing of development subject to the delivery of the necessary infrastructure, proposed new Metro North and its potential extension. The Local Area Plan will assess and determine the appropriate scale and mix of uses of employment, residential and supporting community and retail facilities. The Local Area Plan lands will be subject to a detailed flood risk assessment to address potential flood risk, proposed mitigation measures and assign appropriate land uses. The Local Area Plan will take note of potential noise pollution from road, rail and motorway traffic and implement measures to address any issues that may cause annoyance to potential residents".

### **Housing and Regeneration Act 2015:**

The Council supports the implementation of the Urban Regeneration and Housing Act 2015 and it is recommended that this be highlighted in the Plan.

### **Housing Strategy:**

The Council recognises the interim nature of the current Housing Strategy, pending the preparation by EMRA of a RSES for its area. Recognition of the status of the current Housing Strategy should be included in the Plan.

### **Retail Development:**

The Department's recognition of the Plans contribution to the creation of a vibrant and successful retail sector to strengthen economic activity and deliver the core strategy objective of a sustainable County is welcomed.

# PART TWO

The re-classification of the towns of Donabate, Lusk and Rush to level 3 status as part of the Retail Strategy was proposed under the Draft Plan to align with the 'Moderate Growth Town' status defined for these settlements as part of the RPGs. It is considered that these towns effectively function as Moderate Growth Towns with higher performing urban centres and in this regard the retail status of these towns should reflect this. That said, it is acknowledged that these towns are designated at level 4 in the retail hierarchy as set out in the GDA Retail Strategy 2008-2016 and accordingly, it is recommended that they be reclassified to reflect this in the final Plan (See amendments in response to EMRA submission). A policy should however be included to review the promotion of Donabate, Lusk and Rush as Level 3 Major Town Centres as part of any future revised Retail Strategy for the GDA.

## **Movement and Transport:**

The positive recognition and support for transport infrastructure proposals relating to Metro North and the second runway at Dublin Airport in line with national transport and aviation policies are welcomed.

## **Flooding and Flood Risk Assessment:**

See section in relation to SEA/SFRA.

## **Chief Executive Recommendations:**

### **CE DOHPCLG 1.1:**

#### **2.5 Housing and Population Targets**

##### **Housing**

Based on current housing stock, 5,700 units per annum over the 7 year period 2016 to 2023 would be necessary to fulfil RPG targets. Table 2.5 sets out the housing growth required to meet the RPG targets. In reality, this is an ~~unsustainable~~ *unrealistic target in the context of current market conditions.*

### **CE DOHPCLG 1.2:**

#### **2.6 Housing Land Capacity under the 2011-2017 Development Plan.**

*Swords is identified as a 'Primary Economic Growth Town' within the polycentric gateway under the Regional Planning Guidelines for the GDA and a driver within the core of the Greater Dublin Area, for sustained international and regional economic development and growth. In order to fulfil this role and in light of the emerging role that settlements such as Swords will be required to play in maintaining the success of the GDA, a long term, adequately planned vision is necessary. In this regard, the long term strategic vision for Swords is to create a sustainable city with a commensurate level of jobs and services and infrastructure to support a potential population of 100,000. In endeavouring to achieve this vision of an emerging green city with a thriving economy it is critical that adequate lands are zoned in the future to accommodate the full range of needs of the city's residential population, business community and visitors. Within the current development envelope of Swords, even allowing for the introduction of possible new intensive mixed use zonings along the Metro line, Swords would have the capacity only to reach a population of circa 65-70,000...*

By identifying Lissenhall as a key future development area, the Council is seeking to maximize the opportunities created by the delivery of this key piece of strategic infrastructure in accordance with best planning practice and the principles of sustainable development. The development of the area, *following the sequential development of the existing Swords envelope*, is also consistent with the Council's long term strategic vision for Swords to develop as a sustainable city. It is envisaged that this area could accommodate the development of a significant mixed use urban district providing for a significant level of employment in addition to approximately 6,000 – 7,000 residential units. A Local Area Plan will be prepared for these lands

# PART TWO

to provide a framework for development. Lissenhall is detailed further in Chapter 4 Urban Fingal, in the context of Swords.

## **CE DOHPCLG 1.3:**

### **Before Table 2.8.**

*The Guidance Note on Core Strategies distributed to Local Authorities under Circular Letter PSSP6/2010 sets out that 'apart from Regional Planning Guidelines for the Greater Dublin Area, the RPG housing figures ... have already taken account of the headroom requirements (of up to 50% extra over actual predicted land/unit requirements) specified in the Planning Guidelines on Development Plans, therefore, no further headroom capacity should be provided in development plan zoning outside of the seven planning authorities in the GDA'. Section 4 of the above Planning Guidelines on Development Plans sets out that 'planning authorities should take all reasonable steps to ensure that sufficient zoned residential land is available throughout the lifetime of the development plan and beyond to meet anticipated needs and allow for an element of choice. In particular, to ensure continuity of supply of zoned residential land, planning authorities should ensure that at the time they make a development plan, enough land will be available to meet residential needs for the next nine years. In this way, development plans will provide for sufficient zoned land to meet not just the expected demand arising within the development plan period of six years, but will also provide for the equivalent of 3 years demand beyond the date on which the current plan ceases to have effect'. Accordingly the following figures are based on a calculation of the population requirement over an additional three years from that of the Plan period (equivalent of 3 years demand beyond the date on which the current plan ceases to have effect') and is intended to cater for the longer term development of the County. The reservation of lands at Lissenhall, situated within the Metropolitan Area, accounts for the majority of this headroom allocation.*

## **CE DOHPCLG 1.4:**

After Objective SS03

*The Council will work in cooperation and collaboration with key stakeholders including the DOHPCLG and the Dublin Housing Supply and Co-Ordination Task Force (or any successor) to respond to the current supply challenge in the Dublin region. The Council also will support 'Active Land Management' using Exchequer funding to ensure the delivery of a convincing response to the current social housing demand.*

## **CE DOHPCLG 1.5:**

After Objective SS03

*To engage and implement with the recommendations of the Dublin Housing Supply and Co-Ordination Task Force in responding to the current supply challenge in the Dublin region.*

## **CE DOHPCLG 1.6:**

After Objective SS03

*To identify and support the provision key enabling infrastructure at strategic sites in Fingal County to facilitate their release for development in response to the current housing crisis.*

## **CE DOHPCLG 1.7:**

Before Objective PM01

*To use specific powers, such as the Vacant Sites register as provided for under the Urban Regeneration and Housing Act 2015, to address issues of vacancy and underutilisation of lands in town and village centres in Fingal.*

# PART TWO

---

## **CE DOHPCLG 1.8:**

Before Objective PM01

*To identify obsolete and potential renewal areas within the County and to encourage and facilitate the re-use and regeneration of derelict land and buildings in the County's urban centres.*

## **CE DOHPCLG 1.9:**

Before Objective PM01

*To work with landowners and development interests to pursue the potential of suitable, available and viable land and buildings for development.*

## **CE DOHPCLG 1.10:**

After Objective PM06

*The Council will endeavour to review its Housing Strategy in line with the publication and findings of a Regional Spatial and Economic Strategy (RSES) for its area.*

## **CE DOHPCLG 1.11:**

*See policy recommendation in relation to retail in response to submission by EMRA.*

## **CE DOHPCLG 1.12:**

Amend Section 3.2, subsection Areas of Disadvantage and Vacant and Derelict Sites

Create two new subsections

### ***Areas of Disadvantage and Derelict Sites***

*Specific parts of the County are disadvantaged, particularly the RAPID area in Blanchardstown. The RAPID programme has allowed for a coordinated approach to disadvantage in the area.*

*The Designated Urban Centre Grant Scheme has been developed by the Government to enable investment in urban centres. The objective of this Grant Scheme is to contribute to the improvement in the development potential of Irish urban centres by investing in, and enhancing their economic, social and environmental conditions. This scheme will be available until 2020.*

*The €30 million Village and Town Renewal Scheme announced by Government will run over 6 years. Projects eligible under this scheme will extend to the enhancement of villages, small towns and the surrounding countryside. Projects such as greenways, cycle-ways, upgrading of parks and civic areas, public utilities such as street lighting and renovation of derelict buildings are possible projects which could qualify for funding under this scheme.*

## **CE DOHPCLG 1.13:**

Objective PM 17

*Identify areas and recommend methods of small-scale urban regeneration in the RAPID area and other disadvantaged areas commensurate to the area and in consultation with the local population.*

## **CE DOHPCLG 1.14:**

Objective PM 18

*Implement the provisions of the Derelict Sites Act including listing sites on the Derelict Sites Register and imposing the Derelict Sites Levy.*

## **CE DOHPCLG 1.15:**

Objective PM19

*Promote the utilisation of the available funding to improve and revitalise urban centres, towns and villages.*

# PART TWO

## **CE DOHPCLG 1.16:**

### **Vacant Sites**

*Vacant development sites are both a challenge and an opportunity for the County to provide for additional housing, employment and other space. Active land management including the implementation of the vacant land levy are key planning policies to implement the vision and core strategy of the plan. The Urban Regeneration and Housing Act 2015 provides for a levy on vacant sites and this is a key measure in implementing the Core Strategy by encouraging the development of such vacant development sites.*

*The Act sets out two classes of land*

- Regeneration land, under Section 10(2)(h) of the Planning Act 2000 as amended.*
- Residential land, under Section 10 (2)(a) of the Planning Act 2000 as amended.*

*In accordance with the Urban Regeneration and Housing Act 2015, it is a key pillar of the Development Plan to promote the development and renewal of areas that are in need of regeneration, having regard to the core strategy, in order to prevent:*

- Adverse effects on existing amenities in such areas, in particular as a result of the ruinous or neglected condition of any land,*
- Urban blight and decay,*
- Anti-social behaviour, or*
- A shortage of habitable houses or of land suitable for residential use or a mixture of residential and other uses.*

*The Act introduces a vacant site levy which will generally be an annual charge of 3% of the market value of each site on a vacant sites register which will be maintained by the Planning Authority. The Planning Authority is required to identify sites which are vacant and come within the scope of the Act and to make this list publically available.*

## **CE DOHPCLG 1.17:**

*Objective PM20*

*Identify and secure the redevelopment and regeneration of areas in need of renewal.*

## **CE DOHPCLG 1.17:**

*Objective PM21*

*Implement the Vacant Sites Levy for all vacant development sites in the County and prepare and make available a Register of Vacant Sites, as per the requirements of the Urban Regeneration and Housing Act 2015.*

## **CE DOHPCLG 1.18:**

### **After paragraph 3, Section 4.2**

*The Plan will also promote lands at Lissenhall, through the preparation of a Local Area Plan, to provide for the longer term strategic development of the area to ~~provide for~~ facilitate the long term development in Swords as required. It is envisaged that in the long term this area, subject to infrastructural improvements, could in the future accommodate the development of a planned sustainable mixed use urban district providing for a significant level of employment and residential development. *Development of these lands will only be considered following the prioritisation of development in the Swords area, subject to a detailed phasing program for the release of development in a sequential manner within the lands themselves and subject to other policies contained within the Plan.**

# PART TWO

---

## **CE DOHPCLG 1.19:**

### **Chapter 4 Urban Fingal**

#### **Objective 12 Blanchardstown**

~~Prepare a comprehensive study for the strategic landbank at Dunsink. The study shall include detailed analysis of the physical infrastructure required to enable the lands to fulfil their full potential. The study shall investigate mitigation measures that may be required to address the impact on the site of the adjacent former landfill area.~~

*To carry out a feasibility study of lands at Dunsink to include a full investigation of requirements in terms of infrastructure, water, access, drainage and any remedial measures associated with the former landfill area to inform the future designation of these lands for development. This will be carried out in consultation with necessary statutory agencies and appropriate stakeholders to facilitate the orderly and appropriate release of lands at Dunsink.*

## **CE DOHPLG 1.20:**

### **Chapter 11 Land Use Zoning Objectives**

*New section:*

#### **11.6 Vacant Land Levy – Residential and Regeneration Lands**

*The Urban Regeneration and Housing Act 2015 sets out two broad categories of vacant land that the levy may apply to:*

*Lands zoned primarily for residential purposes*

- *Lands in need of regeneration*

*The following lands zoned for residential or primarily residential purposes are included for the purposes as set out in the Urban Regeneration and Housing Act 2015 in relation to the vacant land levy.*

*RS and RA zoned lands as they have capacity to provide residential accommodation.*

*The following zoned lands are included as lands with the objective of development and renewal of areas in need of regeneration:*

*LC & TC mixed use zonings as they offer great potential for the significant supply of housing and employment space, as set out in their Zoning Objectives. Furthermore, the local and town centre zoned lands are included given their critical role for sustainable neighbourhoods and wider communities.*

*MC zoned lands are included as there are significant vacant lands in this zone which provide an opportunity for the County and given the Zoning Objective: “protect, provide for and/or improve major town centre facilities.”*

*GE zoned lands are included because the Objective is “provide opportunities for the general enterprise and employment.” The primary objective is to facilitate long-term economic development in the region.*

After paragraph 3, Section 4.2

The Plan will also promote lands at Lissenhall, through the preparation of a Local Area Plan, to provide for the longer term strategic development of the area to provide for the long term development in Swords as required. It is envisaged that in the long term this area, subject to infrastructural improvements, could in the future accommodate the development of a planned sustainable mixed use urban district providing for a significant level of employment and residential development. *Development of these lands will only be considered in the context of the prioritisation of development in the Swords area.*

# PART TWO

---

# PART TWO



## CHIEF EXECUTIVE'S REPORT DRAFT FINGAL COUNTY DEVELOPMENT PLAN 2017-2023

### CHAPTERS



# PART TWO

---

## Chapters

### Chapter 1 Introduction and Strategic Context

#### Submissions Received Relevant to this Chapter

D00052, D00186, D00540, D00544, D00577, D00583, D00621, D00681,

#### Issues Raised

##### **Strategic Context**

The CE Report is underpinned by the cross cutting themes of sustainable development, climate change mitigation and adaptation, social inclusion and high quality design. Resilience is a principle which also underpins the Draft Development Plan and is built into the strategic policies and recommendations of the four cross-cutting themes. Issues raised relating to these key overarching strands permeate the policies and objectives of all Development Plan topics, including: Settlement Strategy, Placemaking and Communities, Infrastructure and Movement, Economic Development, Green Infrastructure, Natural Heritage, Cultural Heritage and Environmental Assessments.

##### **Consultation Process for the Draft Fingal Development Plan 2017-2023**

One submission noted that the Fingal website is difficult to use and that it was difficult to make a submission online as it was necessary to set up an account. This had to be activated by email before one could proceed with lodgement of a submission. It was also noted in this submission that it was not possible to lodge submissions by email or to deliver written submissions by hand to Grove Road, Blanchardstown.

##### **Form and Content of the Fingal Development Plan**

Some submissions received proposed changes to the layout of the Draft Development Plan, including the suggestion to have a dedicated Chapter within the Plan to Climate Change. Other submissions proposed the amalgamation of specific objectives within different chapters and the inclusion of additional objectives and policy content.

##### **Strategic Vision, Main Aims, Strategic Policy and Current Context**

One submission noted a number of changes to the text and wording of various sections of the 'Introduction and Strategic Context'. Changes suggested to the paragraph relating to Ministerial Guidelines (page 7 of the Draft Plan) include the removal of the words '*and have been implemented in the various chapters*'.

It is requested that the following paragraph be inserted into Section 1.7 'Current Context':

*The Planning and Development Act 2000 (as amended) requires that a Development Plan shall, so far as is practicable, be consistent with National and Regional Plans, Policies and Strategies which relate to proper planning and development and is also required to have regard to Guidelines by the Minister for the Environment, Community and Local Government'*

One submission noted changes relating to Figure 1.2 of the Draft Plan, to include '*Telecommunications Antennae and Support Structures Guidelines for Planning Authorities*' and '*adjoining Local Authority Development Plans*' within the lists included within Figure 1.2.

It is also submitted that the Development Plan should include a list of mandatory Development Plan objectives and that reference should be made to the 'Two Year Review' required by Section

# PART TWO

---

15(2) of the *Planning and Development Act 2000*. It is also noted that policies should be included in Chapter 1 relating to securing financial resources to implement the Development Plan policies and objectives and a statement in accordance with Section 28 of the *Planning and Development Act 2000* (as amended in 2010) as to how the Plan has implemented or not implemented the policies and objectives of the Minister. It is further submitted that the Draft Plan should include a statement which demonstrates that the objectives included within the Development Plan are consistent, as far as practicable, with the protection and conservation of the environment.

One submission seeks to enhance the policy coverage relating to tourism in the Development Plan to ensure a meaningful framework is established for the enhancement of tourism in the County, and the wider region during the Plan period. It is noted that the vision statement underpinning the Plan (Section 1.4) is positive and the references to the importance of tourism to the County's towns and villages is welcomed. It is recommended that a reference is made to the tourism sector under Items (2) (7) and (9) of the Strategic Vision. It is also noted in this submission that the main aims of the Development Plan include a welcome reference to the implementation of the *Fingal Tourism Strategy 2015-2018*, but it is requested that the main objectives from this Tourism Strategy be included in the Development Plan.

## **Cross Cutting Themes**

### **Sustainable Development**

A number of submissions welcomed the emphasis on putting sustainable development at the core of the Development Plan. One submission noted that most of Fingal's energy comes from imported fossil fuel and that the proposed Development Plan will increase the County's energy bill by a further 50 million euro a year, which will extend the County's liability for carbon emissions and energy insecurity. It is submitted that the Council can help provide significant economic and social sustainability as well as environmental sustainability, which needs to be reflected in an initial equal allocation of land area for bio-energy production as for urban development. It is recommended that the Council provide clear disclosure on the options, cost and consequence, of the fuel source proposed for the 2017-2023 Development Plan allowing residents to make an informed decision as to the level of economic, social and environmental sustainability they want for the County.

Another submission noted that it is very encouraging to see embodied carbon and energy of building materials noted as an important consideration in the Draft Plan and that by promoting the use of responsibly sourced, low carbon building materials, the Council can contribute significantly to reducing carbon emissions in Ireland. This submission seeks the inclusion of additional text within the written statement to require the use of low carbon building materials such as low carbon cement, and where available use Environmental Product Declarations (EPD) for the assessment of the sustainable use of resources and of the impact of construction works on the environment.

### **Climate Change**

A number of submissions highlighted the importance of climate change and the need for a clear focus and strategy in the Development Plan. One submission noted that the Council's current draft proposal to 'investigate' EU funding opportunities such as the Covenant of Mayors represents a continuation in the failure to take progressive action and secure immediate and long term funding opportunities. It is submitted that the Council should make an effort to apply for funds in the next EU funding cycle scheduled for March 2017.

It is noted in one submission that the discussion on climate change correctly addresses the overall framework for climate change mitigation and adaptation, but that more attention is

# PART TWO

---

needed within the Development Plan regarding coastal flooding and erosion and fluvial and pluvial flooding. It is submitted that the discussion on climate change mitigation does not engage with the extent of the challenge we face and that the SEA should be updated accordingly. It is also noted that climate change should be at the centre of the Development Plan including provision that new suburban areas are built as low carbon / zero carbon zones. Amendments suggested for inclusion within the Draft Plan include the setting of targets for emissions reduction from the County along a trajectory over the lifetime of the Plan; provisions for reporting on progress in reducing emissions; and a process of engagement with citizens, businesses and civil society in relation to the changes required.

A common theme in a number of submissions was the serious threat and potentially costly issue that we face if we do not address climate change in the future. The environment, biodiversity and ecological sustainability must be the themes that link and underpin all sections of the Development Plan. It was noted that Fingal is already prone to flooding and to sea encroachment and both of these issues are likely to increase in frequency and severity due to climate change. Food production and living space will be damaged if steps are not taken.

## **Social Inclusion**

One submission noted that the Draft Plan should be amended to clearly outline the steps the Council has taken to consult in a meaningful way with the target population group listed on page 17 of the Draft Plan.

Another submission noted the difficulty with providing information to the public, given the volume of information available. It was noted that many residents of the County do not use computers / can access the Fingal website. It is submitted that it is not possible for these individuals and voluntary bodies to keep abreast of all items on all websites and it is requested that the Fingal website would alert residents when any Department or Government body have consultation periods for projects which may affect Fingal and its residents. It is requested that Fingal set up regular communication with all registered individuals / groups informing them, by email, of developments / proposals / events. These committees can then disseminate the information to their members.

## **High Quality Design**

A common theme in submissions received was the need for good design and it was noted that high quality design and architecture that is in keeping with local architectural heritage should be promoted by having a strong policy on urban regeneration in the Development Plan.

Submissions received noted that high quality design should be promoted, but it must also be carried through to completion. Fingal should support houses which are designed with higher energy ratings and sustainability should be a key focus of new developments with requirements for green roofs, solar panels and passive house standards.

Other elements of sustainable building were noted in submissions received and should be reflected in the content of the Development Plan, with embodied carbon of buildings and material sustainability of construction addressed.

## **Strategic Environmental Assessment and Appropriate Assessment**

Issues relating to the AA and SEA have been later in this CE Report. The SEA and AA are under constant review as the Development Plan progresses through the adoption process. This is an iterative process involving constant assessment as changes are made to the Plan. All comments

# PART TWO

---

taken on board in the submissions will be reviewed by the Consultants preparing the SEA and AA and they will liaise with the Council on their findings and the inputs necessary to the Plan.

## Chief Executive's Response

### Consultation Process For The Draft Fingal Development Plan 2017-2023

The level of public consultation carried out is highlighted in Part 1 (Introduction) of this report. The Council is satisfied that the level of public consultation was comprehensive at every stage of the Development Plan process and is inclusive of all members of the community. Every effort was made to ensure that all members of the public and stakeholders had an opportunity to have their say in an open, accessible and transparent way. Furthermore, this public consultation process was in accordance with the Planning and Development Act, 2000 (as amended).

During the most recent public consultation period (Stage 2: 19<sup>th</sup> February 2016 to 29<sup>th</sup> April 2016), members of the public could lodge submissions on the Draft Fingal Development Plan in a number of ways including online (via the online submission process), or by post (hard copy) or by hand to the Council Offices at Swords and Blanchardstown. Public Information days were also held in March and April 2016 at locations in Swords, Blanchardstown, Balbriggan, Rush, Baldoyle and Santry.

### Form And Content Of The Fingal Development Plan

The form and content of the Draft Plan has been informed by the '*Guidelines to Planning Authorities on the Preparation of Development Plans*' (2007). The Guidelines set out a framework within which Development Plans will achieve high standards in relation to setting out their aims and objectives; how they are produced and presented and their implementation and monitoring. As noted earlier, the Draft Plan is underpinned by the cross cutting themes of sustainable development, climate change mitigation and adaptation, social inclusion and high quality design and these themes permeate the policies and objectives of all Development Plan topics.

Specific changes to Development Plan text, policies and objectives have been referenced in the CE Report under the relevant chapters / section.

### Strategic Vision, Main Aims, Strategic Policy and Current Context

The changes recommended relating to the text regarding Ministerial Guidelines are agreed with and it is recommended that the text be amended accordingly. The Chief Executive also recommends including the new paragraph at the beginning of Section 1.7, as submitted.

It is not considered necessary to include a list of mandatory Development Plan objectives as these are clearly identifiable under the relevant Chapters within the Development Plan layout. Furthermore, it is not considered necessary to include objectives relating to the carrying out of the Development Plan 'two year review', or to include a statement as to how the Development Plan has implemented the policies and objectives of the Minister, as this is an automatic requirement under Planning and Development Legislation. Section 15(2) of the *Planning and Development Act, 2000* requires the Chief Executive to prepare a report for the Elected Members not more than two years after the making of a Development Plan, outlining the progress achieved in securing the objectives of the Plan.

The SEA examines the Development Plan policies and objectives in the context of the protection and conservation of the environment and these are assessed in detail in the SEA / AA element of this CE Report. Furthermore, the objectives of the Strategic Environmental Assessment for the Development Plan require on-going monitoring and review.

## PART TWO

---

The issue of financial resources to implement the policies and objectives is not within the function of the Development Plan process and is dealt with separately under the Council's Capital Programme and Development Contribution Schemes.

The Planning Authority notes the additional reference detail to tourism to be included within the Strategic Vision and will update this Vision, where appropriate, in the drafting of the Plan. The main objectives from the Tourism Strategy are incorporated into the relevant chapters and sections of the Draft Plan, including Chapter 3 (Placemaking), Chapter 5 (Rural Tourism), Chapter 6 (Tourism as an economic driver) and Chapter 8 (Green Infrastructure). It is not considered necessary to amend the policies included within Section 1.4 of the Draft Plan 'Strategic Vision' to include reference to the tourism sector in Items (2) and (9). Item 2 refers to the creation of a high quality built environment and specifically relates to modern architecture and urban design. Item 9 relates to green infrastructure and Fingal's natural resources of clean water, landscape, coastline, greenbelts, etc, and it is considered that an explicit reference to tourism would not be appropriate within the context of these 'strategic vision' objectives.

It is however recommended that a reference to tourism be included within Item 7 (economic development) of Section 1.4 'Strategic Vision', to read as follows: *'Create a competitive business environment supporting economic development, job creation, tourism and prosperity for all.'*

The suggested changes to Figure 1.2 have been noted and it is recommended that the *Guidelines for Planning Authorities on Telecommunications Antennae and Support Structures* and *'adjoining Local Authority Development Plans'* be included within the list of National and Local Documents listed under Figure 1.2 (on page 13 of the Draft Plan).

### **Sustainable Development**

The submission seeking clear disclosure on the options, cost and consequence, of the fuel source proposed for the 2017-2023 Development Plan is noted, however, it would not be possible for the Council to provide such detailed information as it is not currently available. The Draft Plan is required to contain objectives for the promotion of sustainable settlement and transportation strategies in urban and rural areas, including the promotion of measures to reduce energy demand, man-made greenhouse gas emissions and address the necessity for adaptation to climate change, having regard to location, layout and design of new development.

A key area for consideration in sustainable construction and building design specification is in the area of CO<sub>2</sub> and energy with particular reference to embodied CO<sub>2</sub> and embedded energy and this is acknowledged in the policies and objectives contained within the Draft Development Plan. The focus for the County will be directed towards the use of green construction materials. Arising from the *Recast of the European Performance of Buildings Directive 2010/30/EU*, from 1 January 2019, every new public building must be designed to almost zero energy building standards. In addition, all new buildings will have to comply with the new nearly zero energy buildings standards from 1 January 2021. The Council will also have regard to the DoEHLG publication *'Towards Nearly Zero Energy Buildings in Ireland Planning for 2020 and Beyond'* and the *'EU Energy Performance of Buildings Directive (2010/31/EU)'* which promotes the increase in nearly Zero Energy Buildings (nZEB). The Council clearly promotes the development of low carbon buildings and aspires to becoming carbon neutral and will make every effort to increase energy efficiency in this regard.

The Council supports the use of responsibly sourced, low carbon building materials, but it is not considered appropriate to insert new text / objectives within the written statement to specifically require the use of low carbon building materials, such as low carbon cement. Energy efficiency

# PART TWO

and the renewable requirements for new buildings including new residential development are addressed in the Building Regulations Part L. The aim of Part L is to limit the use of fossil fuel energy and related CO2 emissions arising from the operation of a building. The introduction of the BER label (Building Energy Rating), allows for dwellings to be assessed on their energy performance. The provision of this label system allows individuals to make informed decisions regarding the energy efficiency of a building and the materials they choose to use to create such buildings. Incorporation of renewable energy technologies in all new development is therefore required as part of the Building Regulations and the Draft Plan emphasises the importance of renewable energy technologies.

## Climate Change

The *Climate Action and Low Carbon Development Act 2015* established the national objective of transition to a low carbon, climate resilient and environmentally sustainable economy in the period up to and including the year 2050. The Draft Development Plan contains adaptation and mitigation measures and actions to address Climate Change and Fingal County Council recognises the need for the development of a robust strategy to increase climate resilience. Mainstream policies will be incorporated into the Draft Development Plan and integrated with National Plans and those of neighbouring Local Authorities.

The importance of factoring climate change adaption measures into the Development Plan is recognised and the Draft Plan will have regard to the *National Climate Change Adaptation Framework, Building Resilience to Climate Change (2012)*, which requires the integration of adaptation and mitigation measures into the Plan. The Department of Housing, Planning Community and Local Government has been identified as the lead body on National Adaptation Policy and Local Authorities have been given the role to prepare local 'Adaptation Plans' through the Development Plan review process. In May 2016 the EPA published '*Local Authority Adaptation Strategy Development Guidelines*'. These Guidelines are designed to assist Local Authorities in developing local climate change mitigation and adaptation strategies which will assess local vulnerability to climate risks and identify, cost and prioritise adaptation actions. It is noted that this Guidance can be used by each Local Authority to assess the adaptation fitness and coherence of its spatial plans and the other plans and policies under its remit.

The Guidelines follow a clear step by step process to adaptation planning and subscribe to an adaptive risk management approach. The Guidelines describe the tasks that a Local Authority needs to complete in order to develop, adopt and implement an Adaptation Strategy. The six stages are summarised as follows:

1. Forming an adaptation team and preparing the ground.
2. Assessing the current adaptation baseline.
3. Assessing future climate risk.
4. Identifying, assessing and prioritising adaptation options,
5. Developing an adaptation pathway map and drafting the adaptation strategy.
6. Mainstreaming, monitoring and reviewing the adaptation strategy.

Fingal is working closely with Codema (Dublin's Energy Agency) and is at the initial stage of forming an adaptation team and assessing the current adaptation baseline. In response to the climate change challenge, the 4 Dublin Local Authorities (Dublin City Council, Dun-Laoghaire-Rathdown, Fingal and South Dublin County Council) have established expert steering groups with the goal of developing co-ordinated action plans to address the interconnected challenges of climate mitigation, adaptation and carbon free sustainable energy. The Dublin Local Authorities will act in unison and will work with all relevant stakeholders in order to deliver an inclusive and

## PART TWO

---

interconnected climate change mitigation action plan. Internationally, Fingal will liaise closely with the Covenant of Mayors and is currently preparing documentation to become one of the signatories (alongside the other Dublin Local Authorities). Fingal, in conjunction with the other Local Authorities and Codema will seek to draw down funding from various EU funding streams, such as LIFE+, INTERRED, Horizon 2020 and URBTRACT. Private commercial opportunities will also be encouraged wherever possible to deliver solutions.

Preparing a Strategy is likely to be a task which will require significant resources and 'buy in' at all levels and from all Council departments. Due to the timeframes involved in terms of preparation of the Draft Plan, it is therefore likely that the Strategy will be completed post-adoption of the Draft Plan and will therefore be incorporated into the adopted Development Plan by way of a statutory Variation at a later date.

Fingal will also work closely with Codema on the preparation of a Spatial Energy Demand Analysis (SEDA) as part of the Climate Adaptation Strategy. This will integrate energy planning into traditional spatial planning practices and will create an evidence-based energy-related planning policy and associated actions. The SEDA will show exactly where and what type of energy is being used, and the costs of this energy consumption throughout the County in the different sectors (residential, commercial and Local Authority).

### Flooding

Fingal County Council is responsible for the management of surface water drainage at a local level and the Office of Public Works is responsible for flood risk management at a national and regional level. In accordance with the *EU Water Framework Directive*, the *Eastern River Basin Management Plan 2009-2015* details a programme of measures which will be used to deliver surface and groundwater quality targets in the County. Fingal County Council must plan for flood risk and protection and ensure that floodplains and vulnerable coastal areas remain free from development. Flood protection schemes along the coast need to be developed and maintained. A number of specific sites were noted in submissions received, in relation to potential flooding.

The '*Fingal East Meath Flood Risk Assessment and Management*' (FEM FRAMS) Study was completed in 2012. Fingal County Council along with project partners Meath County Council and the Office of Public Works (OPW), have recognised the high levels of existing flood risk in the Fingal East Meath area. To address this issue, the FEM FRAMS Study - a catchment-based flood risk assessment and management study of nineteen rivers and streams and their catchments, including the Broadmeadow River, the Ward River and their tributaries, was undertaken. The information has been used to develop maps for the existing and potential future flood hazard areas within Fingal and to develop a Flood Risk Management Plan that sets out a long-term set of prioritized actions and measures to manage the identified risks.

The effects of Climate Change particularly reduced base flows in streams and rivers, high intensity rainfall events and rising sea levels are taken into consideration in the design of all new projects and developments. The Council supports the precautionary principle whereby action is taken now to avoid possible environmental degradation in the future. The Council will restrict development located in floodplains and vulnerable coastal areas. Parts of Fingal are located on land that is below the average maximum high tide level, and / or located on land within the floodplain of a river. Climate change, in combination with the ongoing urbanization of catchments means that the flood risk to property is continually changing. In order to minimize the impact of an increased future flood risk, there are various steps that Local Authorities can take, including stormwater attenuation and control of development in flood plains (justification tests will be required at specific locations).

# PART TWO

---

Policies requiring the preparation of Strategic Flood Risk Assessments and the inclusion of Sustainable Urban Drainage Systems and Integrated Constructed Wetlands in applications for development will be included in the Draft Development Plan. SUDs measures appropriate to the scale and location of development will be conditioned for all new developments.

Further discussion on climate change, flooding and renewable energy is included within Chapter 7 of this CE Report.

## **Social Inclusion**

The Council is committed to developing a more socially inclusive society and promoting participation and access for all. The *National Development Plan 2007-2013*, the *National Anti-Poverty Strategy 1997*, *Building An Inclusive Society 2002*, the *National Action Plan for Social Inclusion 2007-2016* and *Towards 2016* are the national documents informing the development of a socially inclusive Fingal. A profile of poverty and social exclusion in Fingal has been developed by the Social Inclusion Unit (SIU). The Draft Development Plan has been proofed to ensure it has a strong social inclusion focus, with particular regard to the identified target populations and the disadvantaged areas of the County. The Plan aims to ensure that social inclusion continues to underpin all policies and objectives.

The level of public consultation carried out is highlighted in Part 1 (Introduction) of this CE report. The Council is satisfied that the level of public consultation was comprehensive and inclusive of all members of the community. Every effort was made to ensure that all members of the public and stakeholders had an opportunity to have their say in an open, accessible and transparent way. Furthermore, this public consultation process was in accordance with the *Planning and Development Act, 2000 (as amended)*. Additional public information days were also held in local libraries, hotels and the Council offices and these were well attended.

It was noted in one submission that there is a need for Fingal to inform local people of all plans and documents that may be relevant to them, from the Council and from all other state bodies and groups. Fingal County Council has strong interaction with existing community groups and this liaison and interaction will continue into the future. It is acknowledged that there is a significant volume of information available in the public domain with a number of different organisations and State bodies publishing documents, guidelines and papers on a regular basis. However, it would not be possible for the Council to inform individuals / groups of particular developments that may be of interest to them. The Council publish a weekly planning list which provides information to members of the public in relation to planning applications lodged and decisions made. The Council also carries out comprehensive public consultation when preparing a range of statutory and non-statutory planning documents under the *Planning and Development Act 2000*, as amended.

The Act makes specific provision for citizens to put forward their view or have their say on the future planning and development of the County. The Act also makes specific provision for individuals to be notified of proposals in specific circumstances (e.g. property owners and occupiers). Opportunities to make observations are advertised / invited by way of statutory public notices in locally circulating newspapers.

In addition to the statutory notifications required under the law, consultation can also take the form of public meetings, seminars, workshops, or meetings to inform the formulation of Council plans and policy and serve as an input into determining planning applications. Other State bodies and organisations carry out consultation in a similar manner and they are statutorily obliged to advertise accordingly.

# PART TWO

## High Quality Design

Fingal County Council has demonstrated its commitment to quality architecture both in the promotion of the best of contemporary architecture and in the conservation of the County's architectural heritage.

Through the preparation of Local Area Plans, Masterplans, Urban Framework Plans and the development management process, the Council is striving to improve the design and standard of all new development within the County. In rural areas of the County the Draft Development Plan seeks to ensure sustainable patterns of development and a high quality of design so that these areas remain attractive and retain their rural character. The Draft Plan sets out a range of objectives aimed at creating well designed environments for both rural and urban settings. An overarching aim is to create and sustain people-friendly places for the benefit of the residents and businesses of Fingal, whilst supporting developers seeking to deliver the highest quality design solutions. Chapter 3 of the Draft Plan outlines broad parameters in relation to high quality design, while Chapter 12 sets out development management standards for specific types of development.

The Council is supportive of passive house design and is proactive on the issue of green roofs, green walls, solar panels, rainwater harvesting and other sustainable design features and there are many existing examples of such measures in place within the County.

Policies requiring the preparation of Strategic Flood Risk Assessments and the inclusion of Sustainable Urban Drainage Systems and Integrated Constructed Wetlands in applications for development are also included in the Draft Development Plan.

## **Recommendations:**

### **Strategic Vision, Main Aims, Strategic Policy and Current Context**

#### **CE CH 1.1:**

Amend the text relating to Ministerial Guidelines as follows (page 7 of the Draft Plan): to remove the words '*and have been implemented in the various chapters*'.

*'Ministerial Guidelines issued to Planning Authorities regarding their functions under the Planning Acts have been considered in the making of this Plan ~~and have been implemented in the various chapters,~~ in accordance with Section 28 of the Planning and Development Act 2000 (as amended).'*

#### **CE CH 1.2:**

Insert new paragraph at the start of Section 1.7 'Current Context' to read as follows:

*The Planning and Development Act 2000 (as amended) requires that a Development Plan shall, so far as is practicable, be consistent with National and Regional Plans, Policies and Strategies which relate to proper planning and development and is also required to have regard to Guidelines by the Minister for Housing, Planning and Local Government.'*

#### **CE CH 1.3:**

Amend the wording of paragraph 7 of Section 1.4 'Strategic Vision' to read as follows: '*Create a competitive business environment supporting economic development, job creation, tourism and prosperity for all.'*

# PART TWO

## CE CH 1.4:

Amend Figure 1.2 on page 13 of the Draft Plan to include '*Telecommunications Antennae and Support Structures*' under 'National' and include '*adjoining Local Authority Development Plans*' under 'Local' documents.

## CE CH 1.5:

### Climate Change

It is recommended that the text in paragraphs 3 and 4 on page 16 of the Draft Plan (under Climate Change) be deleted and replaced as follows:

Delete the following:

~~It is recognised that the nature of Fingal's economy, settlement patterns, infrastructure (including roads, electricity networks, water supply and sewer systems), physical geography (e.g. total area, extensive coastline and rivers) and mix of land use (e.g. horticulture and urban/suburban) presents a unique set of challenges in the response to climate change. The Council through proper planning, promoting sustainable development, will work towards reducing greenhouse gas emissions. The Draft Plan 2017-2023 contains provisions dealing with climate change mitigation and adaptation throughout the Plan, in areas such as flood risk management, transportation, surface water, waste management, water services, urban design, energy, natural heritage and green infrastructure. It is an objective of this Plan that Fingal County Council will develop a Sustainable Energy Strategy to include policies and actions that will address climate change and maximize the harvesting of renewable energy at a local level. The Council will also develop a Sector Adaptation Plan for Fingal in line with the forthcoming National Adaptation Framework for Climate Change, recommendations of the Conference of Parties (COP) 21 Paris Conference and in line with the forthcoming legislation and guidelines to be produced by the Department of the Environment, Community and Local Government, when appropriate.~~

~~The Council will also investigate joining the *Covenant of Mayors*, which supports Local Authorities by providing them with the recognition, resources and networking opportunities necessary to take their energy and climate commitments to the next level. Fingal supports the international co-operation of Local Authorities facing the challenge of climate change mitigation and adaptation.~~

Replace with:

*'It is recognised that the nature of Fingal's economy, settlement patterns, infrastructure (including roads, electricity networks, water supply and sewer systems), physical geography (e.g. total area, extensive coastline and rivers) and mix of land use (e.g. horticulture and urban/suburban) presents a unique set of challenges in the response to climate change. The Council through proper planning, promoting sustainable development, will work towards reducing greenhouse gas emissions. The Draft Plan 2017-2023 contains provisions dealing with climate change mitigation and adaptation throughout the Plan, in areas such as flood risk management, transportation, surface water, waste management, water services, urban design, energy, natural heritage and green infrastructure.'*

*In May 2016 the EPA published 'Local Authority Adaptation Strategy Development Guidelines'. These Guidelines are designed to assist Local Authorities in developing local climate change mitigation and adaptation strategies which will assess local vulnerability to climate risks and identify, cost and prioritise adaptation actions (further detail is provided in Section 7.3 – Energy and Climate Change). The Guidelines describe the tasks that a Local Authority needs to complete in order to develop, adopt and implement an Adaptation Strategy.'*

## PART TWO

---

*Fingal is working closely with Codema (Dublin's Energy Agency) and the 4 Dublin Local Authorities, who will act in unison and will work with all relevant stakeholders in order to deliver an inclusive and interconnected Climate Change Mitigation Action Plan. Internationally, Fingal will liaise closely with the Covenant of Mayors and is currently preparing documentation to become one of the international signatories (alongside the other Dublin Local Authorities). Fingal supports the international co-operation of Local Authorities facing the challenge of climate change mitigation and adaptation.*

*Preparing a Strategy is likely to be a task which will require significant resources and 'buy in' at all levels and from all Council departments. Due to the timeframes involved in terms of preparation of the Draft Plan, it is likely that the Strategy will be completed post-adoption of the Draft Plan and will therefore be incorporated into the adopted Development Plan by way of a statutory Variation at a later date.*

# PART TWO

## Chapter 2: Core Strategy and Settlement Strategy

### Submissions Received Relevant to this Chapter.

D00532, D00534, D00662, D00689, D00158, D00170, D00714, D00720, D00520, D00546, D00567, D00568, D00578, D00728, D00022, D00621.

### Summary of Issues

The main themes of the submissions received can be summarised as follows;

- Policy to ensure sufficient housing for social and affordable purposes with a focus on reuse of void properties.
- Additional zoning/rezoning requests.
- Requirement for a sustainable settlement strategy.
- Infrastructure required in line with growth.
- Include Dublin City and Dunsink in the Settlement Hierarchy.
- Additional zoned land required to meet housing targets.
- Include Dublin Airport in Core Strategy.
- Support delivery of homes.
- Revision of zoning land provision at Rowlestown/Naul.
- Consistency of Draft Plan with RPGs.

### Chief Executive Response:

The Core Strategy in line with the Housing Strategy seeks to ensure that the housing needs of Fingal are met for the coming six years in line with a defined Settlement Strategy for the County which is consistent with the RPGs for the GDA. Lands have been identified for development having regard to the position of settlements in the Regional Settlement Hierarchy, availability of services and infrastructure both planned and existing and the potential for economic and social development of the settlement. Detailed infrastructural requirements and phasing requirements are dealt with under the LAP and Masterplans associated with individual areas save for that as outlined at Chapter 7 of the Draft Plan. Policy is proposed (see response to Department of Housing, Planning Community and Local Government submission) to ensure that the Plan supports the implementation of the Housing and Urban Regeneration Act 2015.

The Council are satisfied that the provision of housing units within each of the settlements is sufficient to provide for the anticipated population growth as identified in the RPGs. In this regard the Department of Housing, Planning Community and Local Government and EMRA have indicated that the overall population and housing targets proposed in the core strategy and the policies and objectives contained in the Draft Plan 'are generally consistent with the Regional Planning Guidelines'.

Dunsink has been identified as an area with potential for development over a longer term horizon. In this regard the Council is committed to carrying out a feasibility study to examine the infrastructure required for this strategic landbank to meet its full development potential.

The inclusion of any additional/amendment of zonings as part of the Chief Executive Report will be taken into consideration in the findings of the Core Strategy where relevant.

The theory behind the request for the inclusion of Dublin Airport as part of the Core Strategy is considered to warrant merit, however, Core Strategy's as prescribed are relevant to residential land only. Core Strategies are required by the Planning and Development Act 2000 (as amended) to demonstrate that the development plan and housing strategy are consistent with the National Spatial Strategy and the regional spatial and economic strategy in respect of the area in the development plan already zoned for residential use or a mixture of residential and other uses. In

## PART TWO

---

this regard the inclusion of Dublin Airport as part of the current Core Strategy is considered inappropriate. It is considered that a submission to the upcoming Regional Spatial and Economic Strategy in relation to inclusion of Dublin Airport with regard to a similar type process with regard to economically developed zoned lands would be relevant.

Fingal County Council is currently engaged with the Department of Housing Planning and Local Government and the Dublin Housing Supply and Co-Ordination Task Force in response to the current Dublin Housing crisis. As part of this engagement Fingal County Council are in the process of identifying necessary infrastructure to facilitate the release of strategic land banks for housing in response to this crisis. The Draft Plan further includes policy which supports the growth of the metropolitan area in line with the RPGs. The allocation of projected population growth for the remainder of the County is set out to be reflective of the settlements position in the County Settlement Hierarchy. Specific densities and locations of this development is then guided by way of LAP/Masterplans relevant to the individual areas.

### **Recommendations:**

With respect to the above submissions, no changes are recommended.

# PART TWO

## Chapter 3 – Placemaking

### Submissions Received Relevant to this Chapter

D00016, D00034, D00035, D00043, D00052, D00186, D00189, D00190, D00233, D00386, D00432, D00434, D00443, D00445, D00446, D00448, D00449, D00454, D00450, D00478, D00489, D00491, D00507, D00514, D00519, D00523, D00525, D00528, D00543, D00577, D00578, D00582, D00621, D00622, D00643, D00662, D00681, D00734, D00766.

### Issues Raised

#### **Sustainable Communities**

A number of issues were raised in relation to sustainable communities. The majority were location specific, although the principal applies throughout the County.

Objectives PM2 & 3 were highlighted by Fáilte Ireland as being positive and good policy that would further benefit from the inclusion of tourism as a use/activity in each.

Issues expressed related, in general, to education, adequacy of infrastructure, delivery of infrastructure and facilities, and the needs of specific areas and for specific groups. Issues were also raised about specific community requirements for individual sites located throughout the County. These included issues such as restricting permeability in parts of Swords and restricting amount of fast food outlets and betting outlets in Balbriggan.

Submissions also referenced the need to increase provision of social infrastructure, recreation and sport. It was felt that infrastructure should be provided in tandem with residential developments and should meet the needs of future residents. Lusk Community Council request that further development of Lusk should be incremental and the focus should be on provision of social services. Community interaction is encouraged and will help ensure challenges are managed in a sustainable way.

Concern was raised about the growth of Kinsealy and a definition of a “rural village” is requested.

The need for additional housing was raised in a number of issues. It is considered this is one of the most pressing issues facing the Council. It is considered that housing must be made available on zoned land to allow citizens to find suitable, affordable social housing. Fingal County Council should have a proactive role in the direct building of social housing. A significant amount of new housing will be required throughout Fingal. Furthermore, Fingal should also refurbish and make available empty properties throughout the County. Another submission objects to the building of further social and private housing without adequate recreational infrastructure. Concern has been raised about the amount of housing development in Balbriggan and the densities proposed for future development in the Bremore area. A mix of house types in an area is considered positive.

The importance of maintaining the settlement hierarchy was underlined in a submission. This submitter noted that maintaining physically separate and distinct urban areas helps make sustainable communities.

The submission from the Department of Housing, Planning Community and Local Government notes that further detailed consideration needs to be given to the Development Plan's role in supporting implementation of this Housing and Urban Regeneration Act 2015.

# PART TWO

---

## LAPS, Masterplans and Urban Framework Plans

A number of submissions have raised questions about the provision of LAP's Masterplans and Urban Framework Plans.

The requirement to prepare a Masterplan prior to a planning application is considered to create major difficulties in relation to attracting major projects where time is of the essence – this was highlighted as a particularly difficulty for the Dublin 15 area. It is suggested that following the adoption of the Development Plan all master plans would be completed within an 18 month period.

Another submission outlines why an urban framework plan is more suitable for the Pavilions Shopping Centre area of Swords and seeks an objective to prepare the same.

The Dublin Airport Authority recognises the strong emphasis on Urban Framework Plans and Masterplans and requests that acknowledgement be given to the Masterplan prepared for Dublin Airport Central in this section of the Development Plan (Objective PM 11).

One submission calls for the removal of the requirement for Masterplans from the Development Plan. Fingal County Council should allow developer-led area plans which may then be agreed with the Local Authority at Planning Application stage.

Lastly the EPA note the Council's intention to prepare Local Area Plans for various settlements within the Plan area over the lifetime of the Plan and comments that these should be carried out, taking into account the requirements and obligations in relation to the SEA, Habitats and Floods Directives in particular.

## Public Realm

The issue of public realm and the need for improvement in this area was raised in a number of submissions. Specifically it is considered the visual appearance of a number of urban centres, towns and villages could be improved.

In particular it was noted:

- Residents at Chapel and Fullam Street, Balbriggan request better fencing and seating for this area of the town.
- Pedestrian areas, more trees and a better traffic management scheme is needed along the main street and surrounding roads in Balbriggan to encourage community participation and to entice business back in to the town
- The mobility and access needs of people with mobility impairment and/or disabilities should be supported, reference is made to Skerries, in particular. This can be achieved through a focus on placemaking and permeability in order to create street layouts that are suited to all users.
- Wiring and cabling on Rush Main Street should be underground. Appropriately designed lighting poles and other street furniture appropriate to the vision for Rush should be put in place. Specification should be outlined in relation to building heights, lines and materials for Rush Main Street.

Fáilte Ireland, in their submission, note these objectives are compatible with theirs for enhancement of the visitor experience and they are wholly supportive of these. In terms of the specific needs of the tourism sector, Fáilte Ireland would welcome additional policy coverage with respect to on-street information. In particular there needs to be a strategy to ensure key

# PART TWO

---

visitor attractions are increasingly accessible from public transport corridors. Additional wording is suggested.

The need for proper footpaths which are available for people of all ages and abilities whether walking or cycling, using wheelchairs, mobility scooters and adapted/recumbent cycles is outlined. These should not interfere with the usage open space but should improve accessibility and usage for all.

Lastly the need for good signage promoting open space is highlighted.

## **Sustainable Design and Standards**

Developments should be designed with the needs of the community in mind and proper facilities provided.

Specific design considerations were raised by a number of submissions. These include:

- The Draft Development Plan should be amended to state that where an infill, corner or backland site is being developed, construction traffic may not travel through any adjacent existing residential development where there is another route available.
- More commitment is needed in particular in relation to passive house standards, reference is made to Objective PM 24. Fingal County Council must take stronger steps to promote renewable energy.
- The housing developed to date does not allow for people to expand and grow within the same unit. There is a need for bigger units on bigger sites.
- Objective PM 29 could be strengthened with reference to tourism.

## **Open Space**

A number of submissions indicate the need for more open space at specific locations around the County. There is a need for a greater variety of activities and events that can be accommodated in the public parks.

The Board of Management of Rush and Lusk Educate Together School note the school has been developed on a small site and consequently they lack recreational facilities. The Council must deliver 'Lusk Recreational Hub/Lusk North Town Park' and ensure there are no encroachments on adjoining open space.

A detailed specific proposal for The Mill Pond Park in Balbriggan has been submitted.

Ballymun Kickhams request additional open space for their club, within Ballymun.

## **Community Infrastructure, Facilities and Services**

There is a need for facilities which cater for all elements of society, children, young people, the disabled and the elderly. All new development should be community focused and development should be on the basis of building communities. Social infrastructure should be provided for new communities. These facilities should be provided in tandem with residential development.

Again, a number of groups sought specific community facilities at specific locations. A community centre is requested at Meakstown, a swimming pool in Rush, recreational facilities in Ballymun, an Irish language cultural centre in Dublin 15, provision of multi-sports facilities at Baldoye and the protection of a radio station within the Blanchardstown Centre. Also groups

## PART TWO

---

requested they retain or gain exclusive use of Council owned facilities. Skerries Harps requested this of ground in Skerries.

The need for additional health care services is highlighted and the Irish Heart Foundation outlines the need for the promotion of healthy environments.

The Hare Krishna Community propose to develop a Cultural Centre with a place of worship, along with a horticultural community & recreational areas and outline what this would entail and their preferred locations.

A number of submissions outlined issues in relation to schools and education facilities. An amendment to Objective PM 72, regarding reservation of sites for such uses, is suggested. It is also suggested that the Development Plan prioritise improvement of pedestrian and cycling links on roads leading to schools, Lusk and Rush Education Together school is highlighted here.

A detailed submission has been received from the Department of Education and Skills which states that it is important that suitable sites are zoned to cater for this provision. The Department requests that the Council identify suitably located lands to meet the educational infrastructure needs within the Development Plan in accordance with Development Plans: Guidelines for Planning Authorities, Appendix F (DEHLG, 2007) and the Department of Education and Skills Technical Guidance Documents for primary schools and for post-primary schools. The Council is requested to consider favourable implementation strategies and phasing in the identification of school specific sites in order to ensure ready access to existing infrastructure and to avoid the risk of disproportionate costs by the Department towards such infrastructure to benefit the receiving communities.

The Department requests that site reservations are made, where possible, as close as possible to community facilities such as sports facilities, libraries etc. so that these can be shared between the school and the community. The Department is also open to the concept of multi-campus school arrangements. Where possible, land adjacent to existing schools should be zoned appropriately to allow for the potential future expansion of these schools. In addition, the Council is requested to consider a policy of introducing a buffer zone around existing school sites, where possible. This would facilitate adequate separation from housing while allowing reasonable scope for increased school heights particularly in established neighbourhoods identified for consolidation or intensification of population.

In this regard, the submission concludes that it is important therefore that sufficient lands in the areas where significant additional population is likely to arise, is zoned educational, to ensure that educational infrastructure can be put in place to meet the needs of these new communities.

In addition, this submission notes that the Draft Plan includes a paragraph referring to the Fingal Schools Model and requests this is replaced with the "Memorandum of Understanding" where necessary. Further text changes are suggested. The Council is requested to include specific provision within the Draft Plan to allow and support the intensification of use at existing school locations. This submission also requests that objective PM74 be modified to state that such green design and energy strategies for schools shall be specifically guided by the schools specific conservation measures promoted by the Department of Education and Skills and captured in its technical guidance documents.

# PART TWO

---

## **Chief Executive's Response**

### **Sustainable Communities**

The current Plan supports the development of a hierarchy of high quality, vibrant, consolidated and attractive urban settlements with open countryside and green belt lands that separate the urban areas. These characteristics along with the rural hinterland and villages help to define the character of Fingal, providing a sense of place and local identity.

The proposed changes to PM 2 and 3, as suggested by Failte Ireland are acceptable.

The maintenance of this general pattern of development is important for the sound and sustainable development of the County. The Draft Plan seeks to provide a well-designed built environment with a proportionate scale of development: of sufficient size, scale and density with the right layout to support basic amenities for the community, minimising the use of resources (including land), while maximising efficiencies (including energy); including a well-integrated mix of good quality homes of different types to support a range of household sizes, ages and incomes; buildings that can adapt to meet different needs over time.

The Council acknowledges there is a wide range of community facilities, civic facilities and social services existing in the County and there is a need to continue to develop these facilities. Specific requests such as that made for Swords is dealt with in Chapter 4 and specifically Objective SWORDS 20. In relation to the number of fast food units and betting outlets in Balbriggan, this is dealt with in more general terms in Chapter 6.

The Development Plan facilitates the development and expansion of facilities and services throughout the County and acknowledges the need for social infrastructure to be provided in tandem with residential and other development. Objective PM32 will ensure a holistic approach which incorporates the provision of essential and appropriate facilities, amenities and services, is taken in the design and planning of new residential areas, so as to ensure that viable sustainable communities emerge and grow. These social services will be provided in this way in Lusk and all other settlements. Strong interactions currently exist between the Council and existing community groups, and these relationships should continue to be fostered and strengthened.

Kinsealy is zoned as a Rural Village and will be subject to a Local Area Plan.

Provision of additional housing is a critical issue currently. Fingal are working with various stakeholders to facilitate the development of housing units, both social and private. Objectives PM36 & 37 of the Draft Development Plan requires density to be in accordance with national guidelines, and seeks to ensure increased densities where appropriate and where they do not have a negative impact on the existing environment or on the amenity of existing and future residents. New developments will be assessed with reference to the *Sustainable Residential Development in Urban Areas* Guidelines (2009). In subsection 'Design Criteria for Residential Development, Objective PM 33 ensures a mix of housing types in residential areas to accommodate the diverse needs of the community.

The Draft Plan supports the development of a hierarchy of high quality, vibrant, consolidated and attractive urban settlements with open countryside and green belt lands that separate the urban areas. The maintenance of this general pattern of development is important for the sound and sustainable development of the County.

# PART TWO

---

Section 3.2, subsection Areas of Disadvantage and Vacant and Derelict Sites outlines the requirements of the *Housing and Urban Regeneration Act, 2105*, more detailed guidance on the operation of this legislation has been published by the Department since the publication of the Draft Plan. This is dealt with as part of the EMRA response and the Department of Housing Planning and Local Government (DOHPCLG) response.

## LAPS, Masterplans and Urban Framework Plans

Section 3.2, subsection Strategic Development Zones, Local Area Plans, Masterplans and Urban Framework Plans, outlines the range of plans to give detailed guidance for future development for specific areas of the County. These plans are a mix of statutory and non-statutory guidance documents prepared to create a vision for particular area which must be consistent with the Development Plan and zonings. These plans are necessary to guide and inform both the community and developers as to how the area will develop. The location of certain areas for plans is dealt with in Chapter 4 and 6 of this report.

It is not considered necessary to amend Objective PM 11, as per the DAA's suggestion. Objective PM 11 relates to Swords and Blanchardstown as these are the County's main settlements.

All Local Area Plans will be carried out having regard to the requirements of all relevant environmental screening process and in particular, the SEA, Habitats and Floods Directives.

## **Public Realm**

An overarching aim of the Draft Development Plan is to create and sustain people-friendly places for the benefit of the residents and businesses of Fingal, whilst endeavouring to support developers seeking to deliver the highest quality design solutions.

Specific location requirements are dealt with in Chapter 4 of this CE report.

The Council recognise it is important to promote public spaces and routes that are attractive, safe, uncluttered and work effectively for all in society, including disabled and elderly people. Objective PM 22 seeks to enhance the visual amenity of existing town and village centres, minimising unnecessary clutter, and provide guidance on public realm design, including wirescape, shopfront design, street furniture and signage. It is considered this Objective addresses the issues raised.

## **Sustainable Design and Standards**

The Draft Plan continues to support the provision of a mix of developments in order to create sustainable communities. The policies and objectives in this Section of the Draft Development Plan outline the approach to issues such as design, density, location, height and open space. Government Guidelines, including the *Sustainable Urban Housing: Design Standards for New Apartments*, *Sustainable Residential Development in Urban Areas* and the companion *Urban Design Manual* have been followed. The Development Management process has a key role to play to ensure that development will respect the character of an area.

Appropriate infill development is encouraged in the Draft Development Plan through Objectives PM 39 and PM 40. The provision of access to and from infill sites is a matter for the Development Management process.

Objective PM24 specifically highlights the need for energy efficiency and conservation above Building Regulation standards. Objective PM 07 of the Draft Plan, in conjunction with Building

# PART TWO

---

Regulations, will ensure high levels of energy efficiency and the efficient use of resources. It is considered no additional wording is required.

In subsection 'Mix of Dwelling Types and Adaptable Homes' Objective PM 35 requires a mix and range of housing types in residential areas to accommodate the diverse needs of the community. In addition, detailed specification in relation to house size is set out in Table 12.1.

The proposed text change to Objective PM 29 is acceptable.

## **Open Space**

Sections 3.5 'Open Space' and 3.6 'Community Infrastructure, Facilities and Services' of the Draft Plan will result in the provision of new and/ or improved play, sporting and open space facilities throughout the County. The Council is working to accommodate a greater variety of activities and events in the public parks in conjunction with community groups and other stakeholders.

The delivery of specific areas and types of open space is outlined in Chapter 4 and will ultimately form part of the Development Management process.

Objective PM 50 seeks to ensure the coherent clustering of recreational and open space facilities into a recreational hub arrangement unless a more practicable solution is demonstrated.

## **Community Infrastructure, Facilities and Services**

The need for community facilities and the important role of community groups is recognised by the Council and a fully integrated approach to developing sustainable communities is a key facet of the Draft Plan.

Section 3.5 'Open Space' and Section 3.6 'Community Infrastructure, Facilities and Services' of the Draft Plan require facilities such as playgrounds, childcare facilities and community buildings be provided as part of new developments. The Council, through the 'Housing/Community, Culture & Sports & Libraries Department' supports the development of sporting, community and youth facilities throughout different locations in the County.

Objective PM61 in the Draft Plan is to 'ensure provision of accessible, adequate and diverse community facilities and services in new and established areas to provide for the well-being of residents'. Objective PM 65 is to 'ensure proposals for large scale residential developments include a community facility, unless it can be established that the needs of the new residents can be adequately served within existing or committed community facilities in the area'. The Draft Plan, aided by the Local Area Plan and Development Management processes, will ensure, where possible, the timely and accessible provision of community services and resources, including schools, religious, and community and health facilities.

The delivery of specific areas and types of open space is outlined in Chapter 4 and will ultimately form part of the Development Management process.

Objectives PM 80, PM 81 and PM 82 support the provision of health care facilities throughout the County.

The Draft Plan recognises the growth of faith communities in the County over the last decade and this has given rise to a demand for worship spaces and corresponding community facilities.

# PART TWO

---

Objectives PM 78 and PM 79 seek to facilitate the provision and development of new places of worship in appropriate locations throughout the County.

Educational Facilities have an important role to play in developing sustainable and balanced communities as well as encouraging families to live in the County. Fingal will continue to work closely with the Department of Education and Skills to identify and procure school sites where a shortfall in school places is identified.

An amendment is suggested to PM 72 which makes reference to population growth, anticipated growth based on residential zoned land and having regard to timelines of planning and constructing new school places. This amendment is unduly lengthy and does not add merit to the existing objective. It considered the existing text of Objective PM 72 is suffice.

Section 7.1 of the Draft Plan relates to Transportation Issues. Objective MT11 seeks to improve pedestrian and cycle connectivity to schools and identify and minimise barriers to children walking and cycling to primary and secondary schools throughout the County.

As stated in the Draft Plan the Council will work with the Department of Education and Skills to identify and procure school sites where required. Section 12.8, subsection 'Educational Facilities' acknowledges the specific requirements and guidance set out in within *'The Provision of Schools and the Planning System, A Code of Practice for Planning Authorities, the Department of Education and Science, and the Department of Environment, Heritage and Local Government, 2008'*.

Objectives PM 68 and PM 77 specifically encourage the development of multi-use buildings and the multiple use of school buildings. The Draft Development also encourages the clustering of such community buildings. PM 74 requires good quality sustainable design for all education buildings and should remain.

The provision of a buffer zone around school buildings is not considered necessary. The issue of separation distances and building heights is most appropriately dealt with through the Development Management process.

The Department of Education and Skills also suggest the inclusion of a new zoning for educational purposes. This is not considered necessary, the Draft Plan includes a Community Infrastructure zoning and the provision of Education facilities is either permitted in principle or open for consideration in the LC, MC, ME, RA, RS, RV and TC zoning objectives.

The text changes proposed by the Department of Education and Skills are acceptable.

## **Recommendations:**

### **CE CH 3.1**

#### **Sustainable Communities**

Amend Objectives PM 2 and PM 3 to read:

Protect the primacy and maintain the future viability of the existing major towns in the County and develop them with an appropriate mix of commercial, recreational, civic, cultural, leisure, *tourism* and residential uses.

### **CE CH 3.2**

Ensure each Rural Village develops in such a way as to provide a sustainable mix of commercial and community activity within an identified village core which includes provision for enterprise, residential, retail, commercial, *tourism* and community facilities.

# PART TWO

## CE CH 3.3

### Sustainable Design and Standards

Amend PM 29 to read:

Locate different types of compatible land uses, uses e.g. residential, employment, local retail, tourism and daily service needs close together so as to encourage a greater emphasis on the uses of sustainable transport modes

## CE CH 3.4

### Community Infrastructure, Facilities and Services

Section 3.6, subsection Educational Facilities

Fingal County Council will continue to work closely with the Department of Education and Skills under the Memorandum of Understanding for the acquisition of schools sites to identify and procure sites where a shortfall in school places is identified. Communication between the Council and different patron bodies will assist in allowing the Council to ascertain demand for schools that are based on very wide catchment areas or which do not use a catchment area approach.

In September 2015, a €3.8 billion capital plan was announced by the Government. This funding is for investment in primary, secondary and third level education facilities, combining the upgrade and extension of existing educational infrastructure and the provision of new buildings over the period 2016 – 2021.

~~One of the main educational issues currently facing the County that needs to be addressed includes the increasing numbers of post primary schools that are seeking permission to be accommodated at existing schools where existing open space is at a premium.~~

~~The Fingal Schools Model~~ The Memorandum of Understanding is designed to codify practice in relation to cooperation between the Department of Education and Skills and Local Authorities in the acquisition of sites suitable for the construction and development of buildings for educational purposes. Based on the school planning projections of the Department of Education and Skills, the Council identifies and acquires appropriate sites on behalf of the Department where schools with enhanced sporting, community and arts facilities will be built to the benefit of both the school and the wider community. The design of the schools can vary to meet community needs as identified by the Council. The range of enhanced shared facilities will include amenities such as full-size sports halls, dressing rooms, community meeting rooms, all-weather pitches and playgrounds. These additional facilities (which are over and above the standard specifications for schools) will be available not only to the school during normal school hours but also to the local community outside of these school hours. In the case of schools that are not part of the Fingal Schools Model, the use by the community of school facilities outside of school times is encouraged by the Council.

It is important that schools are located on easily accessible sites. The continued use and possible intensification of existing social infrastructure including schools is encouraged and is consistent with the consolidation strategy of the Draft Plan. Wherever possible, any detrimental impact that schools (or school extensions) may have on the environment of the immediate surrounding areas should be minimised. Therefore, all planning applications for education developments, whether for new development or extensions to existing schools, will be expected to meet the Council's standards regarding quality of design, vehicular movement/ parking and landscaping.

# PART TWO

---

## CE CH 3.5

New Objective

*PM XX*

*Encourage the continued use and possible intensification of existing educational infrastructure where appropriate.*

# PART TWO

## Chapter 4 – Urban Fingal

### Submissions Received During the Consultation Process

D00002 D00003 D00023 D00032 D00034 D00035 D00036 D00039 D00043 D00046 D00048  
D00049 D00050 D00052 D00056 D00057 D00058 D00067 D00163 D00185 D00189 D00190  
D00218 D00228 D00229 D00230 D00236 D00233 D00235 D00244 D00281 D00283 D00325  
D00328 D00332 D00333 D00334 D00336 D00338 D00357 D00373 D00388 D00401 D00403  
D00405 D00414 D00415 D00428 D00432 D00439 D00443 D00446 D00448 D00450 D00451  
D00454 D00456 D00458 D00465 D00475 D00489 D00491 D00492 D00497 D00507 D00508  
D00509 D00516 D00517 D00519 D00520 D00523 D00526 D00529 D00531 D00532 D00534  
D00538 D00539 D00547 D00554 D00555 D00557 D00564 D00567 D00569 D00570 D00571  
D00574 D00576 D00581 D00582 D00583 D00584 D00613 D00617 D00618 D00621 D00622  
D00626 D00627 D00629 D00633 D00635 D00636 D00644 D00662 D00663 D00681 D00689  
D00696 D00700 D00712 D00713 D00715 D00716 D00734 D00753 D00765 D00925 D00932  
D00933.

### Metropolitan Area

#### **Swords**

D00056

The above submission acknowledges and supports the 'ME' (Metro Economic Corridor) at Balheary Road and offers a commitment to work proactively with the Council in the future preparation of a Local Area Plan for the area. The submission also acknowledges and supports the provision of the 'GB' Greenbelt zoning in the context of demarcating the current division between urban and rural and also providing for rural amenity. It is also proposed that additional residential development capacity should be provided at Swords.

#### **Response of the Chief Executive to the issues raised.**

The positive support of policy is welcomed. Development is proposed in line with the requirement of the Regional Planning Guidelines (RPGs) and in line with the provision of identified infrastructure, including future roads infrastructure in the area. The allocation of projected population growth for the County is set out to be reflective of the settlements position in the County Settlement Hierarchy and in accordance with the RPGs.

#### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00058

The submission raises concerns in relation to traffic, including noise and air pollutants, on the Swords distributor road having regard to the extent of development in the area.

#### **Response of the Chief Executive to the issues raised.**

The contents of the submission are noted and in this regard the Draft Plan includes a range of policies supporting the provision of improved public transport and the reduction of pollution by cars and HGVs. Further, the delivery of future development is proposed in line with the requirement of the RPGs and in line with the provision of identified infrastructure provision and upgrades, including future roads infrastructure in the area.

#### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

# PART TWO

---

D00163

The submission seeks the provision of a Loop Walkway to be included in Broadmeadow Estuary.

### **Response of the Chief Executive to the issues raised.**

The merit of the submission is acknowledged. The Broadmeadow Way is a proposed pedestrian / cycle trail between Donabate and Malahide. It is a critical link in the Fingal Coastal Way route as it spans the Malahide Estuary, thereby linking the two peninsulas. The Council is currently progressing this project through the required statutory planning and environmental approvals process. The indicative route is illustrated on the relevant Sheets / Maps. All routes indicated on maps are indicative with scope for amending routes / including new looped routes to Swords Castle, etc, as required.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00235

The submission notes that the Highfield Link road is not mentioned in Chapter 7 MT 28 Table 7A. The submission also requests a need to clearly address how FCC proposes to cater for increased traffic coming from the west of Swords along the Brackenstown road. It is noted that there is currently serious congestion at the junction with Dublin Road/ Main St not just a peak times but also at weekends.

Objective Swords 8 is also referred to in this submission and specifically relates to a Traffic Management Plan for Swords. It is requested that this plan be prepared and issues such as one way systems and banning of right hand turns at certain junctions addressed. The submission notes MT 25 in Chapter 7 referring to improving traffic management at junctions.

The submission also refers to Objective Swords 20 which states that the Ward River Valley Crossing should be restricted to Cycles and Public Transport. This submission expresses concern that if the Traffic Management Plan is inadequate then private cars should not be banned from using the crossing.

### **Response of the Chief Executive to the issues raised.**

The Swords Masterplan has identified transport infrastructure to address the problems of traffic congestion in Swords. The main elements are included in the CDP. The Highfield Link should be in the table of road schemes. The Masterplan examined whether motorised traffic should be allowed on the Ward River Valley Crossing and concluded that there was insufficient demand.

It is considered appropriate rename the 'Brackenstown link' to the 'Highfield link' in the interest of clarity.

### **Chief Executive Recommendation.**

MT 28, Table 7.1:

~~the Brackenstown link~~ *the Highfield link.*

D00489

The submission sets out concerns associated with perceived constraints of the Swords Masterplan in supporting development proposals for the Pavilions.

# PART TWO

---

## **Response of the Chief Executive to the issues raised.**

The Swords Masterplan sets out a holistic framework relating to the future development of the MC (Major Town Centre), zoned lands within the Main Street and North Street areas, Pavilions development area, and Barrysparks development area. The plan supports the consolidation and strengthening of Swords historic Town Centre which is required to enable its continued development as a high quality, vibrant and multi-functional sustainable urban centre. Any amendments to the future development strategy for the area are best considered as part of any future review of the Masterplan save for the rezoning of the internal roads within the Pavilions to reflect existing permitted permission in the area.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended save for the rezoning of the internal roads within the Pavilions to Major Town Centre.

D00497

The submission sets out various suggestions for improved cycleways in Swords

## **Response of the Chief Executive to the issues raised.**

The merits of the submission are noted and in this regard the Plan supports the provision of high quality cycle facilities. It is considered however that the proposals are too specific for inclusion in the Plan and may be more appropriately considered as part of the implementation of the NTA's Cycle Network.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00523

The submission sets out a proposal that Objective 41 should only be considered (if at all) in conjunction with reopening the road between Highfield estate and river Valley estate.

The contents of the submission are acknowledged. Objective 41 proposes to improve pedestrian and cycle facilities for the link to Rathingle Road.

It is considered that whilst the reopening of the link between Highfield Green and Hilltown may improve vehicular permeability, the Design Manual for Urban Roads and Streets promotes filtered permeability (i.e. better permeability for pedestrians and bicycles than for motorised vehicles). Accordingly, opening this link would be contrary to DMURS guidance and Council policy.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00517

The submission relates to lands at Barrysparks with a text amendment sought in relation to Barrysparks Masterplan to reflect the Bovale Masterplan and facilitate a primarily residential development. Specific locations for other development within the Masterplan area are also requested to be included by way of text amendment. (It is also proposed to rezone 'HT' to 'RA', or alternatively rezone 'ME' as an extension to Barrysparks. An extension of Barrysparks Masterplan Area (MP8F) to encompass Bovale 'HT' lands is also sought (See Sheet 8 Response)).

# PART TWO

---

## **Response of the Chief Executive to the issues raised.**

The contents of the submission are acknowledged and in this regard it should be noted that ME zonings facilitate opportunities for high density mixed use employment generating activity and commercial development, and also support the provision of an appropriate quantum of residential development. Accordingly, the inclusion of specific text amendments for each Masterplan area (for 'ME' zoned lands) to reflect this, is not considered necessary. Further, it is the purpose of the Masterplan for these lands to assess and determine the location and of development subject to the delivery of the necessary infrastructure, proposed new Metro North and its potential extension. The Masterplan will assess and determine the appropriate location, scale and mix of uses of employment, residential and supporting community and retail facilities and as such the proposed text amendments are not considered appropriate as part of the Plan.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended (see sheet 8 for further recommendations).

D00539

The submission seeks an amendment to Objective Swords 20 restricting access across the Ward River Valley.

## **Response of the Chief Executive to the issues raised.**

The contents of the submission are acknowledged and in this regard it is considered that Objective SWORDS 20 is sufficiently robust in terms of facilitating the valley as a Regional Park.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00555

The submission sets out support for an LAP on lands at Lissenhall and requests that Objective Swords 27 be time specific.

## **Response of the Chief Executive to the issues raised.**

The Council welcome the support for the policies set out in the Plan. The objectives set out in the plan relate to a six year timeframe the delivery of which are best assessed by Fingal County Council operations department

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00581

The submission seeks the provision of a pedestrian link across lands at Brackenstown House and through phase 9 of Ridgewood to the bus stops on the Rathingle Road. It is stated that this would allow residents of Knocksedan to avail of the 41c, 41x and 102 bus services, and as Rathingle Road on the Dublin side of Swords, journey times into the city centre would be a lot less.

## **Response of the Chief Executive to the issues raised.**

The NTA's cycle network includes a greenway along the Ward River Valley. A link to Knocksedan could be considered as part of the design.

# PART TWO

---

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00644

The submission seeks the subdivision of Seatown Masterplan into two Masterplans

## **Response of the Chief Executive to the issues raised.**

The proposal to separate the Seatown Masterplan into two separate areas is acceptable. It is recommended two Masterplans are prepared, Seatown North and Seatown South. The existing distributor road through the area will be the boundary. New objectives will be prepared for each area.

## **Chief Executive Recommendation:**

Separate Seatown Masterplan (MP8D) into two separate Masterplans. The existing distributor road shall be the boundary. Include new objectives as follows:

### **Seatown North MasterPlan**

- *Future development shall provide a strong urban edge with attractive elevations which satisfactorily address, overlook and provide a high degree of informal supervision of the R132 and the east-west distributor road going through Swords Business Park.*
- *Provide for appropriate relationship and integration of development with the R132 and the proposed new Metro North at this location.*
- *Higher/denser development shall provide a key urban edge adjoining the R132 and the east-west distributor road.*
- *Lower density family houses may be considered along the northern part of these lands adjoining Seatown Road.*
- *Provide for the protection of the residential amenities of existing housing adjoining the subject lands by minimising visual intrusion, overlooking and overshadowing and additional traffic.*
- *Reserve a School site as required in consultation with the Department of Education and Skills.*
- *Retain and consolidate existing trees and hedgerows within and bounding the Master Plan lands in as far as is practicable.*
- *Develop direct, attractive and overlooked pedestrian and cycle routes within the subject lands and connecting these lands to the proposed new Metro North; Swords town centre, Seatown Road and the Malahide Estuary.*
- *Provide for the proposed Sutton to Swords cycle route along the east- west distributor road.*
- *Provide for appropriate uses and layout on lands adjoining the M1*

### **Seatown South Masterplan**

- *Future development shall provide a strong urban edge with attractive elevations which satisfactorily address, overlook and provide a high degree of informal supervision of the R132 and the east- west distributor road going through Swords Business Park.*
- *Provide for an appropriate relationship and integration of development with the R132 and the proposed new Metro North at this location.*
- *Provide for a vehicular connection between the subject lands and the Malahide Road.*
- *Higher/denser development shall provide a key urban edge adjoining the R132 and the east-west distributor road.*
- *Lower density family houses may be considered along the southern parts of these lands adjoining existing residential development.*

## PART TWO

- *Provide for the protection of the residential amenities of existing housing adjoining the subject lands by minimising visual intrusion, overlooking and overshadowing and additional traffic.*
- *Retain and consolidate existing trees and hedgerows within and bounding the Masterplan lands in as far as is practicable.*
- *Develop direct, attractive and overlooked pedestrian and cycle routes, within the subject lands and connecting these lands to the proposed new Metro North; Swords town centre and the Malahide Estuary.*
- *Provide for appropriate uses and layout on lands adjoining the M1.*
- *Reserve a school site as required in conjunction with the Department of Education and Skills.*

D00681

The submission seeks the amendment of Objective 26 (Lissenhall) to state that no residential development shall commence with the LAP unless and until the Government approves the awarding of the main infrastructural contract by TII for the construction of the new proposed new Metro North to Lissenhall.

### **Response of the Chief Executive to the issues raised.**

In accordance with the Regional Planning Guidelines, any large designation of new housing lands expanding the current footprint of the Metropolitan area should be directly linked to provision of new, existing or upgraded high quality rail based public transport services. By identifying Lissenhall as a key future development area, the Council is seeking to maximize the opportunities created by the delivery of key strategic infrastructure (Metro North) in accordance with the RPGs, best planning practice and the principles of sustainable development. The development of lands at Lissenhall will only be considered over a longer term horizon. The following provision has been included at Objective SWORDS 24, "as part of the Lissenhall LAP, facilitate and actively promote the provision of a Lissenhall Metro North Stop that would include significant Park and Ride capabilities and bus service facilities".

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00689

The submission seeks the application of a sustainable settlement strategy for Swords. The following issues are considered under the submission; there are too many housing units planned in areas LAP 8.A and LAP 8.C; there is an imbalance between population and planned facilities, infrastructural deficit i.e. road access. The submission also comments on a number of objectives, as follows: Objective Swords 4: 'Keep to planning guidelines/recommendations for area. No developer led developments. Obj S 5: 'Ensure planned critical links such as local bus service and future extensions in plan.' Obj S 6: 'The Western Distributor Road should commence immediately.' Obj S 7: same as objective Swords 5 suggestion. Obj S 8: 'Urgent, prioritize pedestrian use.' Obj S 9: 'Needs to be resurfaced in large parts, unsafe'. Obj S 10: 'Implement with objective Swords 8.' Obj S 11: 'Provide high quality cycle lanes that are safe.' Obj S 12: 'Provide connecting paths.' Obj S 13; 'Critical for the future development of Swords and should be number one priority.' Obj S 14: 'Broadmeadow River Park - designate type and quantity of planned sports facilities.' Obj S 15: 'Complete linking pathway on Bridge Street. Improve lighting.' Objective Swords 16: 'Provide safe pedestrian link/bridge at entrance to Dublin Road to Airside retail park.'

### **Response of the Chief Executive to the issues raised.**

The positive recognition of the objectives outlined is welcomed. It is considered that the policies provided in context of the specific amendments are sufficiently robust to cater for the

# PART TWO

---

recommendations set out whilst also being of a strategic nature to facilitate the wider development of the area.

The allocation of projected population growth for the County is set out to be reflective of the settlements position in the County Settlement Hierarchy. Specific densities and locations of this development are then guided by way of LAP/Masterplans relevant to the individual areas in line with infrastructural requirements. It is policy of the Plan to ensure adequate provision of accessible high quality open space and recreational facilities. The Council recognises the requirement for consultation with businesses and accordingly commits to implementation of the Action Plan for Jobs. The implementation of the strategy will be successfully achieved through engagement, collaboration and partnership with a number of key stakeholders. These include the new structures within Fingal that are focussed on the local economy, the Economic Development and Enterprise SPC and the LEO.

In terms of infrastructure and movement policy, the Plan seeks to develop integrated land use and transportation policy which seeks to link sustainable modes of transport. Other specific proposals cannot be delivered under the Plan however their delivery is supported in the policy set out.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00713

The submission seeks a new objective to be added to Chapter 4 within Fosterstown Masterplan text facilitate the accommodation of a major hotel / conferencing centre within a parkland setting as a landmark development adjacent to and accessed from the Pinnock Hill Roundabout and the R132 public transport corridor.

## **Response of the Chief Executive to the issues raised.**

It is considered that there is a need to promote the development of a 5 star hotel incorporating conference facilities in the County town of Swords. The Fosterstown lands located at the southern entrance to the town and adjacent to the proposed new Metro North is considered a good location for a well-designed landmark hotel and accordingly the Plan should include support for same.

## **Chief Executive Recommendation.**

Fosterstown Master Plan.

*Consider the provision of a hotel at a suitable location within the Fosterstown lands.*

## **Blanchardstown**

D0002

The submission sets out that there is no provision in the plan to provide a convenient cycling route between Castleknock and the Royal Canal cycle route. This submission links this statement with Objective GI 25, which states: *'Maximise the use and potential of existing parks, open space and recreational provision, both passive and active, by integrating existing facilities with proposals for new development and by seeking to upgrade existing facilities where appropriate.'*

## **Response of the Chief Executive to the issues raised.**

It appears that the proposed cycle link passes through lands in the ownership of Irish Rail and other third parties. While this proposal may best be considered in the detailed design of the Royal Canal Cycle Route, objective GI 29, which states: *'Develop a Cycle/ Pedestrian Network*

# PART TWO

---

*Strategy for Fingal that encompasses the Fingal Way and other proposed routes which will be screened for Appropriate Assessment and Strategic Environment assessment.*, would capture the feasibility of this proposal.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00003

The submission seeks the repair of the Silver Bridge (Guinness or Farmleigh Bridge) connecting to Farmleigh estate in Castleknock.

**Response of the Chief Executive to the issues raised.**

Proposals to improving pedestrian and cycle links across the River Liffey and increasing accessibility of the Liffey Valley SAAO lands are welcomed. Further studies are required to establish whether Silver/ Guinness/ Farmleigh Bridge would be accessible from either the Fingal County or South Dublin County sides.

This bridge is a protected structure (no. 754). The Draft Development Plan contains a local objective no. 148 which states: 'Restore the Metal Bridge on the Lower Road and utilise it as a strategic pedestrian /cycle link from Farmleigh car park to Waterstown Park via Coates lands in co-operation with South Dublin County Council.'

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00048

The submission states the need for recreational/playground facilities on open space at Laural Lodge.

**Response of the Chief Executive to the issues raised.**

The identification of recreational facilities needed at Laurel Lodge is acknowledged. Whilst the Plan is not the appropriate mechanism for the delivery of such facilities, it is policy of the Plan to ensure adequate provision of accessible high quality open space and recreational facilities.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00052

The submission sets out issues associated with an EPA licenced landfill in proximity to Dunsink zoning and the need to take account potential interactions.

**Response of the Chief Executive to the issues raised.**

The issues outlined are acknowledged and will be taken into consideration as part of any development proposals for the site. In this regard it is proposed that policy be included (see Chapter 2 Core Strategy) to carry out a feasibility study of lands at Dunsink, to include a full investigation of requirements in terms of infrastructure, water, access, drainage and any remedial measures associated with the former landfill area to inform the potential designation of these lands for future development.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

# PART TWO

---

D00454

The submission seeks the protection of the existing radio station within Blanchardstown town centre

**Response of the Chief Executive to the issues raised.**

The role of the existing radio station to the community is recognised and the existing use on the site is supported by the zoning to which it relates. Accordingly it is not considered that a further objective is necessary in this instance.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00519

The submission seeks the creation of an Irish Language Cultural Centre (also Chpt 3 & 10)

**Response of the Chief Executive to the issues raised.**

The Council supports the proposals set out. The Draft Plan contains policy as set out at Section 10.4 which supports this concept.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00529

The submission welcomes the expansion of Blanchardstown Core Retail Area welcomed however the expansion to include Verona Clubhouse is questioned. Clarification is sought concerning the relationship between the Masterplan referred to in the vision for the MC zoning and the UFP referred to in Objective Blanchardstown 1. Request for the removal of Metro West Route and references to same are also sought.

**Response of the Chief Executive to the issues raised.**

The contents of the submission are acknowledged and positive support of the strategy is welcomed.

The role of the urban framework plan for Blanchardstown Village to guide and inform future development of previously developed brownfield areas which includes the consideration of improvements to the existing Village streetscape and environment through appropriate high quality infill development. The proposed masterplan will consider the wider holistic development of the area in relation to both greenfield and brownfield development having consideration to urban conservation, public transport requirements, pedestrians and cyclists facilities and proposals to minimise the impact of private car based traffic whilst enhancing and developing the existing urban fabric.

Having regard to the extent of the existing and established Core Retail area of Blanchardstown Town Centre, it is considered appropriate to remove the playing pitches at Verona from Figure 6.2 Blanchardstown Core Retail Area.

While Metro West has not been included in the Government's capital programme 2016 -2021, a significant amount of preliminary design work has already been carried out. Although the exact route has not been approved, it is prudent to maintain a corridor free from development to facilitate the delivery of a light rail system in the future.

# PART TWO

---

**Chief Executive Recommendation:**

Remove the playing pitches at Verona from Figure 6.2 Blanchardstown Core Retail Area.

D00531

The submission seeks to remove requirement for a Masterplan (MP13.A) from Part A lands the development of which has been approved and is the subject of extant planning permissions. Amendments sought to remove requirement for a LAP (LAP 13.B) from the Ashtown Business Centre site as it is suggested that the site is accessible to the N3 and forms a logical extension of the Ashtown Business Centre. There is also a request to remove the requirement for a Local Area Plan (LAP 13.B) from the Railway Station Site which has existing access from the N3 Interchange and directly adjoins an existing main line railway station.

**Response of the Chief Executive to the issues raised.**

It is considered that the development of the above referenced lands is best considered in the context of a planning framework which considers the holistic development of their area.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00547

The submission seeks an amendment to the zoning of the lands to the north of Connolly Hospital which are utilised as part of the healthcare facilities on campus, currently zoned RS and OS to CI. An amendment of the wording of policy Objective Blanchardstown 14 and Local Objective 104 to ensure that future healthcare needs in line with Government policy can be provided for at Connolly Hospital is also sought.

**Response of the Chief Executive to the issues raised.**

It is considered reasonable that the CI zoning at Connolly Hospital be reassessed to cover all the land where CI activities of the campus are occurring in the interest of the future orderly consolidated development of existing facilities.

**Chief Executive Recommendation:**

Amend zoning to reflect CI activities.

D00569

The submission relates to Hansfield SDZ and Barnhill LAP and seeks a local objective regarding access into development on the east side of the Barnhill Road (R149).

**Response of the Chief Executive to the issues raised.**

The merit of the submission is acknowledged. Access to Hansfield SDZ was determined as part of a transportation assessment to guide the development of these lands as part of the SDZ process. Access in respect of Barnhill is best considered as part of the preparation of Barnhill LAP with the evaluation of these lands for development carried out in the context of access and infrastructure.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00581

The submission seeks the provision of a bus-only link between Huntstown Wood and Littlepace, where pedestrian and cycle connections already exist.

# PART TWO

---

## **Response of the Chief Executive to the issues raised.**

It is considered that there is merit implementing the Huntstown bus gate and the feasibility of same should be investigated.

## **Chief Executive Recommendation:**

Insert a Local Objective to provide for a bus-gate between Huntstown Wood and Littlepace.

D00613

This submission supports the residential zoning [RA] objective relating to the Barnhill LAP lands and cites a number of reasons in the submission for the development of these lands.

## **Response of the Chief Executive to the issues raised.**

The positive recognition of policy is welcomed.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00621

The submission seeks an additional sub section on the Royal Canal.

## **Response of the Chief Executive to the issues raised.**

The merit of protecting the Royal Canal is acknowledged. In this regard the Draft Plan contains a number of policies which relate to the protection and enhancement of the Canal in the context of the development of individual areas. The Canal is also designated as a proposed Natural Heritage Area to conserve species and habitats of national importance. The Council will normally only grant permission where it is clearly demonstrated that a proposal will have no significant adverse impact on the habitats and species of interest in the designated area and its ecological integrity. Further, objective Ch41 seeks to 'protect and enhance the built and natural heritage of the Royal Canal and ensure that development within its vicinity is sensitively designed and does not have a detrimental effect on the character of the Canal, its built elements and its natural heritage values and that it adheres to the (DRAFT) Waterways Irelands Heritage Plan 2016-2020'.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00712

The submission relates to lands at Ashton House and Demesne where proposals are set out for courtyard town houses, nursing home, leisure centre and a new apartment scheme. The submission seeks rezoning of the eastern part of lands initially from 'HA' to 'RS' and wants these lands excluded from the study area shown on Sheet 13 (Dunsink Lands study area).

## **Response of the Chief Executive to the issues raised.**

The subject lands are situated within the Tolka Valley and are strategically located between the Royal canal and Tolka River with a protected Structure located in situ. Any development on this site needs to be undertaken in the context of the overall development of the area which the Dunsink Study seeks to facilitate. It is considered that to encourage isolated development within the study area would undermine the principle of the proper sustainable development of the area.

# PART TWO

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

## **Castleknock Village**

D00002

The submission sets out a request to facilitate a cycling route between Castleknock and the Royal Canal cycle route.

## **Response of the Chief Executive to the issues raised.**

A cycle route from Castleknock to the Royal Canal is included as a secondary route within the NTA cycle network and will be subject to public consultation and detailed design. Objective 151 of the Draft Plan promotes a strategic pedestrian and cycling link across the River Liffey. A connection from Castleknock to the Liffey could be examined within the public consultation and design stage of this strategic link.

The Council's Transportation Section reports that a realignment of the NTA's Cycle Route 5 to Castleknock College would be disruptive for commuter cycle traffic from Diswellstown/Carpenterstown to Dublin, using White's Road to access the Phoenix Park. In this context, the map based local objective relating to the NTA's 'Dublin 15 Priority Cycle Route 5' for the Greater Dublin Area should remain to facilitate a direct route to the City Centre

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00373

This submission requests that the Development Strategy for Castleknock Village acknowledges the adjacent location to the historic Phoenix Park. The submission also notes the location of the Village as an important gateway to Fingal and in this regard requests the inclusion of an objective in the Development Plan to promote and enhance the gateway. A further objective is requested to be included to improve the cyclist facilities within the Village, in particular the linkage of these facilities with the network of cycle lanes within the Phoenix Park.

## **Response of the Chief Executive to the issues raised.**

The role of Castleknock as a gateway to Fingal is acknowledged however given the requirements of the RPGs the inclusion of such terminology is not considered appropriate for inclusion in the Draft Plan. It is suggested that specific details in relation to the village are best considered in the context of an Urban Framework Plan for Castleknock to guide and inform future development.

In terms of the improvement of cycle facilities and linkages, the merit of the submission is welcome and it should be noted that Objective MT09 seeks to 'promote walking and cycling as efficient, healthy, and environmentally-friendly modes of transport by securing the development of a network of direct, comfortable, convenient and safe cycle routes and footpaths, particularly in urban areas. The Council will work in cooperation with the NTA to implement the Greater Dublin Area Cycle Network Plan subject to detailed engineering design and the mitigation measures presented in the SEA and Natura Impact Statement accompanying the NTA Plan'.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

# PART TWO

---

D00401

The submission seeks the retention of TC zoning and supports the preparation of a new Urban Framework Plan for Castleknock. Reference to appropriateness of Level 4 retail description is also set out.

**Response of the Chief Executive to the issues raised.**

The positive support of policy is welcomed. Retail policy is set out in the Plan in line with the Retail Planning Guidelines for the greater Dublin Area as required.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00508

The submission relates to Hollywoodrath and Hollystown and states that the proposed provision of schools is considered to be excessive. It is requested that the objective for a proposed school on subject lands to the east of the R121 be removed from the land use zoning Sheet 11.

**Response of the Chief Executive to the issues raised.**

It is noted that the provision of new schools is primarily the responsibility of the Department of Education and Skills. In this regard the Department is guided by the Code of Practice on the Provision of Schools and the Planning System (2008). The Code of Practice sets out co-ordinated actions to be taken by Planning Authorities and the Department in planning for the provision of school sites within the planning system.

Indicative school site icons are identified at strategic locations within new development areas, with the exact location, layout and detail to be finalised at planning application stage.

It should be noted that if alternative sites are considered more suitable, become available or are required in the future, the Council will work with the Department of Education and Skills and other bodies to ensure the development of schools at the optimum locations. It is considered that the removal of this schools objective would be premature at this juncture.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00534

The submission requests that lands at Castleknock College campus be incorporated into the 'development area' of Castleknock and that the proposed cycle route along the southern campus perimeter be redirected to the north. It is requested that identified land, which are not used for recreational or other useful purposes by the school, be rezoned Residential zoning.

**Response of the Chief Executive to the issues raised.**

A cycle route from Castleknock to the Royal Canal is included as a secondary route within the NTA cycle network and will be subject to public consultation and detailed design. Objective 151 of the Draft Plan promotes a strategic pedestrian and cycling link across the River Liffey. A connection from Castleknock to the Liffey could be examined within the public consultation and design stage of this strategic link.

The Council's Transportation Section reports that a realignment of the NTA's Cycle Route 5 to Castleknock College would be disruptive for commuter cycle traffic from Diswellstown/Carpenterstown to Dublin, using White's Road to access the Phoenix Park. In this

# PART TWO

---

context, the map based local objective relating to the NTA's 'Dublin 15 Priority Cycle Route 5' for the Greater Dublin Area should remain to facilitate a direct route to the City Centre.

The inclusion of the lands at Castleknock College as part of the designated development area of Castleknock is considered appropriate.

**Chief Executive Recommendation:**

Lands at Castleknock College to be incorporated into the 'development area' of Castleknock.

**Clonsilla Village**

D00583

The submission supports Objective Clonsilla 6 and other objectives relating to the Royal Canal. It is sought that the Plan prioritises the completion of Royal Canal Greenway. Other changes are propose including Blanchardstown 1 - to include 'at all times respect the historic nature of the Village'

The submission considers that the Blanchardstown Plan focuses on the Shopping Centre and not the Village. A similar development strategy to Castleknock is sought with a new objective included that will 'recognise the importance heritage character of the Village (Blanchardstown) as an attractive gateway to the Blanchardstown Centre. The submission seeks a new objective to be added to the Plan to 'develop a bridge from Royal Canal over Railway to St Catherine's Park'.

**Response of the Chief Executive to the issues raised.**

The support of policy is welcomed. The Council are committed to working in cooperation with the NTA to implement the Greater Dublin Area Cycle Network Plan which included the delivery of the Royal Canal Greenway. The delivery of further cycle links should be considered in the context of the NTA's proposed cycle network and as part of the detailed design of the Royal Canal Cycle Route. The inclusion of such routes and facilities in the CDP is however considered premature.

The Plan recognises the role of Blanchardstown as the largest commercial and residential centre within the Metropolitan Area of Fingal and promotes the development of its social, cultural, leisure and administrative services in addition to that of the retail function associated with the Shopping Centre.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00629

The submission seeks the rezoning of lands from 'OS' to RA at Weavers Walk, Clonsilla.

**Response of the Chief Executive to the issues raised.**

It is considered that the existing 'OS' zoning is appropriate for these lands given the relationship of the land to the existing adjacent residential development. Having regard to the physical extent of the existing development it is considered appropriate that the lands are reserved for recreational and amenity purposes.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

# PART TWO

---

D00663

The submission relates to lands at Old School House, Poterstown. The zoning of the lands is welcomed however concerns are expressed in relation to Masterplan Brief MP 13.B and the ability to redevelop the site.

### **Response of the Chief Executive to the issues raised.**

The support for the Plan policy is welcomed. It is considered that the policy in respect of the lands are appropriate having consideration to the sensitivity of the protected structure on the site and the need to protect the architectural heritage of the County. In this regard, in the interest of feasibility, it is recommended that the wording be strengthened to provide for a recreational/tourism hub with tourism related uses.

### **Chief Executive Recommendation:**

Old School House Masterplan.

Insert additional bullet point.

*Provide for a recreational/tourism hub at this location facilitating a linear public park in addition to tourism related uses such as short-stay accommodation, restaurants and craft shops to be scaled and designed in a sensitive manner to reflect the sensitive environment.*

### **Coolmine Industrial Estate**

D00388

states that at a large number of the Units in the area designated to be reviewed LC are in the region of 200 sq.m.

The submission relates to Coolmine Industrial Estate and states that a number of existing units are greater than 200 sq m. and therefore not in compliance with Objective COOLMINE 2 regarding site sizes.

### **Response of the Chief Executive to the issues raised.**

The submission is acknowledged however it should be noted that the policy refers to the development of future units in the industrial estate and therefore no further amendment is necessary.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00583

The submission relates to Coolmine Industrial Estate and requests that Fingal County Council takes action regarding signage / advertising / hoarding. It is also requested that the number of signs and advertisements in the area be limited and businesses be required to remove excess (and enforce same).

### **Response of the Chief Executive to the issues raised.**

The issues set out in the submission are acknowledged. The enforcement of planning and litter regulations are covered by statute and therefore Fingal County Council are required to deal with such issues under relevant regulations regardless of the policies contained in a Development Plan.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

# PART TWO

---

## Hollystown

D00328

The submission states that additional lands should be zoned 'RV' where there is a demand for 3 / 4 bedroom houses. It is suggested that the Council should prioritise the acquisition of adjacent 'OS' to create recreational place for existing and future residents and improve the footpaths and cycle routes to Tyrellstown during the life of the Development Plan, if not earlier.

### **Response of the Chief Executive to the issues raised.**

The proposed request is not acceptable for a number of reasons:

The Draft Plan has proposed a change in zoning at Hollystown from 'RV' to 'RS' for practical reasons as the majority of the lands have been built out. There is no longer a requirement for 'RV' at this location.

All the 'Green Belt' lands are located outside of the development boundary of Blanchardstown. This proposed rezoning would allow a greater level of land uses outside this development boundary.

The reason for the provision of a 'Green Belt' is to create a rural/urban zone that permanently demarcates the boundary between rural and urban area, to check unrestricted sprawl of urban areas, to prevent countryside encroachment and to protect the setting of villages and towns. Allowing this change of zoning would erode the overarching greenbelt zoning and would act as a precedent for further encroachment of the rural countryside.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

## Donabate

D00023

The submission raises concerns relating to access to Turvey Avenue.

### **Response of the Chief Executive to the issues raised.**

The issues outlined are acknowledged. It is considered that these issues are best assessed by Fingal County Council operations department.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00032

Issues raised in the submission in relation to bollards in Donabate Village and fencing including road safety concerns at Beaverstown Rd.

### **Response of the Chief Executive to the issues raised.**

The issues outlined are acknowledged. It is considered that these issues are best assessed by Fingal County Council operations department.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00163

The submission raises concerns in relation to the wording of Objective Donabate 4 in terms of potential to impact on the viewing of swans.

# PART TWO

---

## **Response of the Chief Executive to the issues raised.**

The above objective seeks to improve the permeability of the area whilst ensuring the protection of designated European sites as required under legislation. It is the intention of the objective to facilitate future pathways and cycleways in the area. It is not intended that the policy should have any implication for existing swan viewing areas

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00185

The submission seeks a new objective to provide a pedestrian / cycleway route along eastern side of railway embankment (Beaverstown Golf Club).

## **Response of the Chief Executive to the issues raised.**

The alignments shown on the CDP maps are indicative and subject to detailed design and public consultation and according no further amendment is necessary.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00570

The submission seeks the provision of a cycle lane on the Hearse Road to facilitate passage for cyclists between Donabate Village, Newbridge House and Swords – in keeping with Objective Donabate 16.

## **Response of the Chief Executive to the issues raised.**

The merits of the submission are noted and in this regard the Plan supports the provision of high quality cycle facilities. There are a number of constraints associated with the proposed route and accordingly, it is considered that the proposals may be more appropriately considered as part of the implementation of the NTA's Cycle Network. The NTA Cycle Network includes a link to the Broadmeadow Way and through Newbridge House to Lissenhall and Swords.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00571

The submission seeks inclusion of an objective to provide for a Hearse Rd 'Gateway Space' linking Donabate Village to Newbridge Demense and a new objective to be added to map and written text in Ch 4 'Donabate' including consolidation of Donabate footprint.

## **Response of the Chief Executive to the issues raised.**

It is not considered necessary to attach a new Local Objective to provide for a Hearse Road 'Gateway Space' linking Donabate Village to Newbridge Demesne. The Donabate LAP provides sufficient guidance in relation to the development of walkways and key linkages on the Peninsula and their indicative routes are included within the LAP and accompanying phasing maps. Any proposed 'Gateway Space' to link Donabate Village to Newbridge Demesne can be dealt with as part of the development management process.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

# PART TWO

---

D00633

The submission seeks the inclusion of various new walkways and cycle routes including Newbridge Demesne and to coast and Portrane

## **Response of the Chief Executive to the issues raised.**

A key feature of the development strategy of Donabate LAP is the delivery of approximately 30km of inter-connecting pedestrian and cycle routes on the Peninsula and these routes are detailed in Section 4 of the LAP. These routes will provide linkages throughout the Peninsula Lands, which will connect the LAP lands to the Village Centre, the Rail Station, existing residential areas and schools, Newbridge Demesne, Turvey Nature Reserve, St Ita's and the beaches at Donabate and Portrane.

It is an objective of the Local Area Plan to improve access to Newbridge Demesne and to implement the Turvey / Newbridge Loop – a pedestrian and cycle route which links Turvey Nature Reserve to Newbridge Demesne, the Broadmeadow Way and Donabate Village via the new and existing developments areas at Turvey and Corballis.

It is considered that the footpath improvements proposed along Turvey Avenue and the improved access arrangements to the Demesne from the Beverton / Beresford estate (i.e. opening the red door access point to the Demesne) will provide greater flexibility and ease of access. The Council is fully committed to the planning, development and implementation of these routes and their delivery is dependent on a multi-agency approach between landowners, environmental bodies and funding agencies with Fingal as the lead agency. The Council is currently progressing with the planning of various sections of these routes.

It is acknowledged that existing pedestrian infrastructure on Hearse Road is poor with very restricted potential for roadside footpaths. A new pedestrian / cycle bridge over the rail line is proposed to connect new development in the Corballis West area to the Village and Train Station. The Council is actively working towards resolving identified constraints in this area and, to this end, an Action Plan is currently in preparation, which will ensure that the necessary funding and resources are identified to deliver the critical pieces of infrastructure in this area. The Action Plan will include a full traffic assessment to examine the delivery of a pedestrian crossing from Newbridge Demesne to Beresford Estate / Turvey Avenue. Similarly, an Action Plan will be prepared for the provision of a footpath along Hearse Road identifying potential constraints and identifying the funding and resources required to deliver a footpath at this location.

It is considered that the process of identifying and seeking resource allocation for the upgrade and provision of footpaths and cycleways is more appropriately addressed through the established Area Committee procedure rather than in a strategic Development Plan document.

The cliff walk between Portrane and Donabate is included as part of the Fingal Coastal Way. This route is a long standing objective of the Fingal Development Plan and is a strategic greenway for pedestrians and cyclists along the coastal corridor from Howth to Balbriggan. An audit of these existing trails including 'rights of way' will form part of the planning and development of the strategic greenway of the 'Fingal Coastal Way' and the coastal path linking Donabate and Portrane is included in this audit. There are a number of relevant policies and objectives included within the Draft Plan to progress the Fingal Coastal Way, including Objective ED61, which seeks to: 'Promote and facilitate opportunities to create an integrated pedestrian and cycle network linking key tourist destinations in the County, by advancing the proposed Fingal Coastal Way, through carrying out a route evaluation study within two years of the adoption of

## PART TWO

---

this Plan, ensuring a balance is achieved between nature conservation and public use and through identifying public rights of way in consultation with all relevant stakeholders, and by exploiting former rail networks for use as potential new tourist and recreational walking routes.'

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00636

The submission outlines the importance of the new Bypass being completed immediately. It is also indicated that community facilities should be identified for the Parish Hall and adjacent lands. It is indicated that the siting of schools while welcome should be looked at more carefully. It is suggested that the School on Turvey side of the bridge should be looked at, e.g. Beverton, to stop traffic congestion. Issues are identified in relation to Footpaths and Access to Newbridge Park and House, parking requirements, civic open space and graveyard upgrades. Pontoons and a hatchery beside the old Balleally dump are also proposed.

### **Response of the Chief Executive to the issues raised.**

The merits of the submission are noted and in this regard the Plan supports the provision of the bypass in the CDP. The Donabate LAP recently set out detailed framework for the development of Donabate over a six year horizon and any amendments to land use is best considered as part of any future review to said Plan. It is considered that the remaining issues on ground are best assessed by Fingal County Council operations department.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

## **Malahide**

D00635

The submission seeks the removal of the Masterplan designation for the lands (MP9A) as lands fall within the Streamstown LAP. Amendment is also sought for Local Objective 49 to read as follows 'No new or widened vehicular entrances will be allowed onto the Dublin Road between Back Road and the Swords junction' as is the removal of density cap of 10 units per hectare. There is a request for the removal of the requirement to provide pedestrian/cycling linkages to adjoining lands at Abington (shown on Streamstown LAP) as Abington estate is gated and as such full public access to the Auburn lands could not be facilitated.

### **Response of the Chief Executive to the issues raised.**

It is considered that a master plan is necessary for the subject lands to provide for a detailed design framework which best guides the development of the area. Having consideration to the location of the subject lands, it is considered that low density development, reflective of the area and to be determined by way of a wider masterplan, is appropriate and in line with the County Settlement Hierarchy. The extent of the area to which Local Objective 49 relates is considered appropriate. The promotion of walking and cycling is considered a key element of the Draft Plan and accordingly policy to facilitate the delivery of associated infrastructure is promoted throughout.

### **Chief Executive Recommendation:**

Remove reference to density of 10 units per hectare on Sheet 9.

Streamstown Masterplan

*Facilitate low density residential development reflective of the character of the area.*

# PART TWO

---

The lands will be the subject of a detailed flood risk assessment. (See also sheet 9 for related recommendations).

## **Baldoyle**

D00230

The submission requests the maintenance of green belt lands between Portmarnock and Baldoyle while providing appropriate recreational uses within Baldoyle Racecourse Park. In relation to Objective Baldoyle 2 it is stated that Howth Junction Train Station requires a redesign plan in terms of layout and public safety.

### **Response of the Chief Executive to the issues raised.**

The merits of the submission are noted and in this regard the Draft Plan provides for a strategic greenbelt between Baldoyle and Portmarnock with no proposals to dilute this reservation. The adopted Baldoyle/Stapolin and Portmarnock LAPs includes a Green Infrastructure and Landscape Strategy for the Racecourse Regional Park lands. The focus for the strategy is on integrating a network of natural habitat/biodiversity locations, parkland for recreational uses, green routes, heritage features, surface water and flood risk management successfully with these development areas. Both these LAPs include a phased approach to the delivery of this proposed green infrastructure in tandem with development. The specific elements of this required green infrastructure will be delivered as part of the Development Management Process. The Draft Plan contains an objective to facilitate improvements to pedestrian access to and from Howth Junction Station. Further works both within the station and to the station itself are within the remit of Iarnród Éireann.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

## **Portmarnock**

D00557

The submission refers to Objective PORTMARNOCK 4 which seeks to 'Protect and manage the flood plain of the Sluice River to the south of Portmarnock and ensure that its integrity as a natural habitat is maintained; and investigate the potential of a riverside walkway'; and seeks to ensure that future users of the walkway are not endangered by mishit golf balls, raising particular concern to the proximity of the third and sixth holes which run parallel to the river on its northern bank. It is indicated that in the event that proposals for a walkway are advanced the Golf Club wish to be consulted.

### **Response of the Chief Executive to the issues raised.**

The merits of the submission are noted and will be taken into consideration as part of any future development proposals in the area on the part of the Council.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00564

This submission refers to a number of strategic objectives regarding Portmarnock as set out in Chapter 4 and recommends a number of new objectives relating to various issues as set out below.

Objective Portmarnock 4 is referred to in this submission and specifically states that the flood plain of the Sluice River should be managed to preserve and conserve the freshwater marsh.

# PART TWO

Objective Portmarnock 5 is referred to in this submission and specifically requests that Portmarnock car-parking facilities be urgently increased at Portmarnock Railway Station.

This submission requests new objectives for Portmarnock to address the following;

- The provision of cycleway and footpaths on, a. The Moyne Rd. /Coast Rd. to Baldoyle b. Portmarnock to Malahide - taking due care not to damage the flora of the bank on the footpath between the two areas c. Drumnigh Rd. and the Moyne Rd. to Balgriffin d. Chapel Lane to Malahide Rd.
- The route from the Moyne Rd to the Drumnigh Rd. and down Station Rd. The submission requests that all other roads upgrades in the new County Development Plan for Portmarnock should be dropped off the list until this upgrade is completed. The Moyne Rd. which is listed is of a very high standard by comparison.
- Upgrading of all access routes from the roundabout at the end of Station Rd. to Dublin Airport. This route is the main road from Baldoyle, Sutton and Howth to Dublin Airport. It requires major upgrading for cars, trucks, cyclists and walkers.

## **Response of the Chief Executive to the issues raised.**

Access for the proposed school at the Teagasc lands is a matter for the Development Management process. Additional footpath and cycle paths are included in existing and proposed LAPs. The protection and management of the flood plain of the Sluice River to ensure that its integrity as a natural habitat is maintained is provided for at Objective Portmarnock of the Draft Plan. The Draft Plan supports the delivery and expansion of rail infrastructure and its associated requirements including 'supporting an increase in car parking space provision'. Proposed cycleways are identified in the NTA's Cycle Network. Additional cyclepaths will be considered as part of any significant road or development scheme or LAP/MasterPlan.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

## **Balgriffin And Belcamp**

D00520

The submission seeks the rezoning of lands at Snugborough, Mayne Road (northern part) from 'GB' to 'RS', and (southern part) from 'GB' to 'OS'

## **Response of the Chief Executive to the issues raised.**

The Ministerial Planning Guidelines on Development Plans, issued under Section 28 of the Planning and Development Act 2000, state that 'zoning that is not responsive to or justifiable by reference to reasonable needs, or that substantially exceeds such needs, is not consistent with proper planning and sustainable development.' The Guidelines also make clear that in order to support public confidence in the planning system and the Development Plan process, decisions to zone land must be clearly justified on the basis of established need and must support the aims and strategy of the plan taking the following specific matters into account:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage policy, including conservation of habitats and other sensitive areas.

# PART TWO

---

This rezoning submission seeks to allow residential development on lands located within strategic Greenbelt areas and sensitive High Amenity lands and they cannot be justified based on the specific issues outlined above, whilst significant residential zoned lands remain undeveloped.

Such a development pattern would result in deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns, a poor quality, fragmented rural environment and the erosion of Greenbelt areas.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

## **Santry**

D00526

The submission relates to lands between Old Ballymun Road and the R108 within the Masterplan lands MP11A. The removal of the subject lands from the Masterplan lands is sought or alternatively an objective stating that 'the lands between the R108 and the Old Ballymun Road shall be allowed to bring forward proposals for development in advance of the preparation of a Masterplan for the area (11.a), and applications will not be dependent upon the preparation and agreement of a Masterplan or prepare the Masterplan for the area without any further delay, after the making of the Development Plan and within the first year of the new Plan', is sought. The submission also seeks the rezoning of lands from "ME" to "LC" and the inclusion of the site "Northwood West" in the Fingal County Retail Hierarchy, as a level 4 Local Centre to allow for the development of a supermarket in accordance with footnote 26 of the zoning matrix. There is also a request for further detail on Local Objective 80 (underpass) to include an indicative location.

## **Response of the Chief Executive to the issues raised.**

There is no evidence based justification for a change to the retail status as set out in the Draft Development Plan in chapter 6, Economic Development, other than to seek a change to a zoning objective from ME to LC to allow a supermarket of a certain size that requires a level 4 retail classification. (It should be noted that a retail supermarket of ≤ 2500m<sup>2</sup> is permitted in principle use within ME zoned lands.)

This site in the context of the Masterplan lands MP 11A has been given consideration. Having regard to the existing permission for development which is in place in respect of the site, it is recommended that the Masterplan MP 11A area be revised to exclude this site.

The specific details in relation to the provision of any underpass at this area will be subject to a detailed design process and public consultation procedure which will inform its exact location having consideration to any on site constraints.

## **Chief Executive Recommendation:**

Remove lands from Masterplan.

## **Charlestown And Meakstown**

A number of submissions have been received relating to the need for community facilities, particularly a school and that the area to be given better identity through for example signage.

D00035 (need for community facilities)

# PART TWO

---

D00036 (dumping and need for landscaping)

D00039 (signage and identity)

D00516 (rezoning of the 'GE' lands to the south of Charlestown Place (referred to Phase 4 lands) to facilitate a primarily residential development on these lands as part of the Charlestown Centre development. Amendment is also sought to Objective Charlestown and Meakstown to read as follows; 'Develop an enhanced community identity within Fingal through the improvement of residential amenities and the promotion of mixed uses, including residential, in Charlestown Centre. In particular, the development of the TC lands to the south of Charlestown Place for residential use will be supported.

## **Response of the Chief Executive to the issues raised.**

The merits of the above submissions are recognised and the Council recognises the importance of providing a framework which supports the provision of facilities and allows the area to develop and enhance its identity. In this regard the Draft Plan seeks to 'improve and deliver enhanced community and recreation amenities to the area with particular emphasis on a community centre to provide for the community and sporting needs of the area including the provision of changing rooms if required and improvements to the quality of open space. It is not considered that the proposed zoning amendment is suitable at this location having regard to the extent of residential lands in the vicinity and the need to facilitate general employment in a consistent fashion to the remainder of the surrounding lands.

It is noted that the provision of new schools is primarily the responsibility of the Department of Education and Skills. In this regard the Department is guided by the Code of Practice on the Provision of Schools and the Planning System (2008). The Code of Practice sets out co-ordinated actions to be taken by Planning Authorities and the Department in planning for the provision of school sites within the planning system. If further sites are considered necessary in the future, the Council will work with the Department of Education and Skills and other bodies to ensure the development of schools at the optimum locations.

Other issues outlines are considered to fall within the remit of operational functions of Fingal County Council.

## **Chief Executive Recommendation.**

Objective CHARLESTOWN AND MEAKSTOWN 1

Develop an enhanced community identity within Fingal through the improvement of *social, cultural, community and residential amenities*. *Support the development of a sense of identity for the area including improvements to signage, landscaping and physical appearance and through the promotion of mixed uses, including residential, in Charlestown Centre.*

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

## **Ballymun**

D00753.

Submission welcomes the publication of the Draft Fingal Dev Plan, at a strategic level and Dublin City Council (DCC) supports the Dublin Airport expansion and optimised Metro North Investment projects for the overall benefit of the city and Dublin region.

DCC own c.27 ha of undeveloped lands to the south of the M50 and west of the R108 within administrative boundary of Fingal known as the 'M50 lands'. The proposed land use zonings (HT, ME, GE) will facilitate the City Council's vision for these lands as the employment generating and economic driver for Ballymun (in tandem with lands on Main Street).

# PART TWO

---

Retention of Objective SANTRY 5 to provide the underpass under the R108 to integrate the M50 lands and the Northwood lands strongly supported by DCC given the investment in the new St. Margaret's Road and will facilitate the future build out of Northwood and the M50 lands; important strategic land banks for the Dublin region.

DCC welcome participation in the preparation of the Masterplan for Northwood, MP11A in line with objective PM09.

Due to proximity of the Northwood lands to the Ballymun town centre and its location on the optimised Metro North route, critical to improve connectivity between Northwood and surrounding areas, to facilitate the complementary growth and development of the area as one integrated unit.

DCC supports Objective SANTRY 4 and notes receipt of submissions during the Issues Paper stage to improve linkages between Ballymun and Santry Demesne.

Retention of the current retail objective no. 448 (map based) and Retail Objective no. 31(Retail Strategy, Appendix 2 current Dev Plan) for local retail in Northwood is sought to support and reinforce the Level 4, Neighbourhood Centre guidance and designation as set out in the RSGDA. (further rationale for their retention set out in submission).

DCC welcomes and supports initiatives to promote and co-ordinate the integrated development of strategic land banks.

## **Response of the Chief Executive to the issues raised.**

The positive support for and recognition of the Fingal Development Plan and its associated policies are welcomed as is the support for Dublin Airport expansion and Metro North Investment projects for the overall benefit of the city and Dublin region.

The Council recognise the positive advances made under the Ballymun regeneration program and support the preparation of a Local Area Plan for Ballymun.

The council notes and supports the current higher density employment zoning in Ballymun and also supports the provision of underpass under the R108 to provide access from Ballymun to Metro North and Northwood.

ME zonings seeks to facilitate opportunities for high density mixed use employment generating activity and commercial development, and support the provision of an appropriate quantum of residential development within the Metro Economic Corridor. In this regard the ME zoning allows for comparison retailing of  $\leq 500$  sqm nfa, retail-local  $<150$  sqm nfa and retail-supermarket  $\leq 2,500$  nfa. Accordingly the inclusion of LO 448 and retail objective 31 from the current Development Plan in the ME zone would be contrary to the underlining zoning objective for the area.

Recommendations in respect of the reinstatement of retail objectives are dealt with under Chapter 6.

## **Chief Executive Recommendation.**

With respect to the above submission, no changes are recommended.

## **Portrane**

D00547

The submission seeks to have the lands at St. Ita's rezoned from HA 'High Amenity' to C1, 'Community infrastructure'.

# PART TWO

## **Response of the Chief Executive to the issues raised.**

It is considered that the existing zoning at St. Ita's is appropriate having regard to the special character and distinctiveness of this highly sensitive landscape- and the unique Landscape Character in Fingal and the Greater Dublin Area

Designated as an ACA also, the zoning facilitates the protection of the built heritage of the area whilst also supporting;

[i] the long term planning and sustainable development of the St Ita's Hospital complex and demesne into the future by supporting the implementation of the objectives laid down in the completed Feasibility Study of St Ita's (Local Objective 245 Fingal County Development Plan 2011 – 2017) and with particular regard to the conservation of the historic buildings within the designated ACA at St Ita's and .

(ii) scope for appropriate re use of the historic structures at St. Ita's, including the accommodation of new modern health care and ancillary facilities within the historic hospital lands at St. Ita's.

The above mentioned Feasibility Study prioritized the re-use of the existing hospital buildings (many of which are Protected Structures) together with their maintenance and management into the future, the ongoing maintenance and management of existing trees and woodland and the maintenance and provision for an appropriate level of public accessibility through the site

The 'HA' zoning at St. Ita's reflects the very special character and distinctiveness of this highly sensitive landscape- a uniquely special place in Fingal and the greater Dublin area which needs to be carefully protected and managed into the future.

The proposed change in zoning to 'C1' would undermine the ability of the Council to protect or conserve St. Ita's Demense into the future and it is considered that the existing objective on these lands is sufficiently robust to accommodate the future sustainable development of the site in an appropriate fashion.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00626

The submission sets out a development proposal for lands at the Burrow, Portrane abutting the estuary (14 acres approx.) to be given to Fingal County Council for the benefit of the local community to provide walkways and a nature reserve with residential development proposed to accommodate the proposal. Owners to provide flood defence, access road to be made available, footpath etc. 12 one-acre sites for single storey housing to be provided. A proposed rezoning from HA to accommodate the proposal is suggested.

## **Response of the Chief Executive to the issues raised.**

The contents of the submission are acknowledged and the unique character of lands at The Burrow is recognised. Accordingly, any development in this area must be sensitively designed and must respect the unique character, landscape and visual amenities of the area, taking account of the ecological sensitivity of qualifying features of nearby European Sites. It is not considered appropriate to zone these lands for residential development and the 'RU' zoning with the attached map based local objective currently allows for an appropriate level of small-scale residential infill at a relatively low density.

# PART TWO

---

Having regard to the existing development at the Burrow, it is considered appropriate to carry out a study to decide on the optimal future development of lands in this area, having regard to the local issues of coastal erosion and the significant landscape and biodiversity sensitivities in the area including a Flora Protection Order, Special Protection Area (SPA), Natural Heritage Area (NHA), Special Area of Conservation (SAC) and designated Ecological Buffer Zone.

## **Chief Executive Recommendation:**

Objective Portrane xx

*Prepare a study to decide on the optimal future development of lands in the Burrow area, having regard to the local issues of coastal erosion, flooding, drainage and the significant landscape and biodiversity sensitivities in the area including a Flora Protection Order, Special Protection Area (SPA), Natural Heritage Area (NHA), Special Area of Conservation (SAC) and designated Ecological Buffer Zone.*

D00681

The submission seeks to amend the written statement to state that the plan will promote the provision of a marine slipway for community recreational use at a suitable location. In relation to St Ita's Walled garden it is requested that the ensure that restoration and re-use of the St Itas historic walled garden for joint community and hospital use. A zoning request if also set out for the Burrow Portrane for two areas from RU to RC.

## **Response of the Chief Executive to the issues raised.**

The walled garden is owned by the HSE and is located within the Strategic Infrastructure Development application site for the National Forensic Mental Health Service Hospital. In the approved development granted by ABP for the hospital the HSE stated that its aim is to bring the walled gardens back into use as a therapeutic garden in the long term.

Refer to Rural Cluster response as set out at Chapter 5.

The inclusion of an objective for the provision of a slipway is considered premature pending the completion of a feasibility study.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

## **Hinterland Area**

### **Balbriggan**

D00049/ D00050/ D00281

The above submissions state the need for accessible outdoor basketball courts.

## **Response of the Chief Executive to the issues raised.**

The site in question is subject to a Landscape masterplan for Bremore Regional Park lands. The merits of the submission are acknowledged and it is considered that the Council should liaise with the local community to investigate potential for such a court in context of any future Masterplan for the area. Any future Masterplan will include statutory consultation from interested parties and residents regarding uses.

## **Chief Executive Recommendation:**

With respect to the above submissions, no changes are recommended.

# PART TWO

---

D00189

The submission suggests changes to town centre traffic management through one-way systems in addition to the need to complete proposed link roads.

## **Response of the Chief Executive to the issues raised.**

The contents of the submission are noted. It is considered that one-way streets have benefits (eg more space for parking/footpaths) and disbenefits (e.g. higher vehicular speeds, longer routes for cars and buses). The feasibility of the proposed one-way / pedestrianisation would need to be established in detail before implementation of such measures.

The plan supports the provision of the link roads outlined (Table 7.1) the delivery of which will be related to operational plans. A Traffic management scheme is required for Balbriggan and a suggested one-way system proposed for Clonard Street, Chapel Street, Fulham Street, Railway Street, George's Street, Mull Street, Convent Lane, Quay Street, Hampton Street and Drogheda Street. Urban Framework Plans and Local Area Plans scheduled for preparation within the lifetime of the Development Plan will address other local traffic management issues including car parking, pedestrian safety, streetscape and public realm.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00190

The submission states the need for greater business diversity in the town centre, restrictions on fast food outlets and removal of illegal advertising.

## **Response of the Chief Executive to the issues raised.**

The Draft Plan includes policy which supports the provision of a vibrant business and a varied retail offer that is sufficient in terms of scale, type, and range in Balbriggan. The consideration of particular uses should be assessed on their own merits as part of the Development Management process in line with the zoning objective for the area.

The enforcement of planning and litter regulations are covered by statute and therefore Fingal County Council are required to deal with such issues under relevant regulations regardless of the policies contained in a Development Plan. Objective ED532 prevents an oversupply of such uses.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00283

The submission acknowledges the need for social housing in a fair and equally distributed manner throughout the County. It is stated that social housing should be spread amongst housing developments so no single development has more than an acceptable number. Also include properties of private investors. Preference should be given to those on the housing list the longest and locally based.

## **Response of the Chief Executive to the issues raised.**

The submission is acknowledged and in this regards the provision of social housing is carried out in line with an evidence based Housing Strategy which has been prepared for the County having regard to the most recent summary of social housing assessments prepared under section 21 (a) of the Housing (Miscellaneous Provisions) Act 2009.

# PART TWO

---

To ensure a fair distribution of social housing across housing developments, the introduction of the Urban Regeneration and Housing Act 2015 sets out recently revised Part V arrangements in respect of residential developments including elimination of previous options allowing for the fulfilment of Part V obligations by means of the transfer of sites or land elsewhere, or of making cash payment in lieu of Part V obligations. There is a fresh focus on the provision of an element of social housing as an integral part of new housing projects.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00332

The submission relates acquisition of a building for 'Culture and Arts' uses located in the old town centre to be put into community ownership and be converted into a civic centre. Support for sailing and water based activities is also sought.

**Response of the Chief Executive to the issues raised.**

The merits of the submission are acknowledged, however, having consideration to the nature of the building in question which is in private ownership, the conversion of same for Arts and Culture is considered to be outside of the remit of the Council.

The support for sailing and water based activities are recognised and in this regard the Draft Plan supports the preparation of a Regeneration Strategy for Balbriggan Harbour which is considered the appropriate mechanism to investigate the detailed potential for sailing and water based activities.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00333

The submission recognises tourism as a key economic driver and sets out the need to tie in sites such as Bremore Castle and Balbriggan Harbour. Suggestions for an interpretive centre at Martello Tower/Boat house and good walking/cycling links are suggested. A number of initiatives for the development of the town into the future are also set out in relation to the potential of the Harbour.

**Response of the Chief Executive to the issues raised.**

The Draft Plan supports this submission in recognising the tourism potential in town. It is considered that the issues and initiatives outlined as part of the submission are sufficiently catered for under Objective Balbriggan 4.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D000334

The submission raises concerns with respect to anti-social behaviour and the requirement for better policing, youth projects and educational facilities, neighbourhood participation strategies, CCTV, and 'grafitti cleaning'.

**Response of the Chief Executive to the issues raised.**

The issues outlined are acknowledged. It is considered that these issues are best assessed by Fingal County Council operations department where appropriate. In relation to the specific activities suggested in relation to anti-social behaviour and policing it is considered that a

# PART TWO

submission to Joint Policing Committee in this regard would be relevant. This process offers an opportunity to develop greater consultation, cooperation and accountability between An Garda Síochána, Local Authorities and elected local representatives, with the participation of the community and voluntary sector, on the management of policing and crime issues.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00336

The submission outlines a perspective of the town as being very disjointed and spread out making access for sport and recreation a problem for youth. It is set out that more facilities, eg. Water sports, cycle network, re-build lake and arts projects are required.

## **Response of the Chief Executive to the issues raised.**

The issues outlined in the submission are acknowledged and in this regard the Draft Plan includes policy to 'facilitate the implementation of the Urban Design Framework Plan and Balbriggan Public Realm Plan for the town centre to encourage the regeneration of the identified potential development sites within the town centre. This strategy includes specific objectives and proposals throughout the town including proposals for linkages of open spaces and amenity areas. The Council have also developed a new pathway linking Bremore Regional Park with the town centre and the plan to continue to develop the town. Further specific objectives as set out in the submission are best considered as part of any future Local Area Plan and proposed Master Plans for the area.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00338

This submission from Balbriggan Chamber of Commerce requests the promotion of a range of objectives in the Development Plan under a number of themes as follows;

- Economic/Enterprise Development (development of a Master Plan and Marketing Plan- Enterprise Zone, Enterprise and Training Centre (BEaT) , promotion of the area from a commercial/industrial location for prospective industry, inclusion of a hotel and conference centre use, provide for ancillary retail, café and marketing uses, promote commercial clusters, stakeholder engagement, promote Food/Agri and green energy and production, promote 3<sup>rd</sup> level education facility, promote and facilitate the development of the disused factory site, to the north of the beach/harbour as a mixed residential, hotel, leisure and entertainment precinct, carry out environmental improvements).
- Town Centre (promote core retail area and quality of retail, commercial, civic, cultural, leisure, community and other services, promote owner occupier business/residential on the main streets, review the commercial rates, retain the Main Street as the core of the town centre, promote high quality shop-front design, promote and develop the Balbriggan Creative Quarter (BCQ) as a hub for new and emerging entrepreneurs.
- Social Diveristy (ensure an even spread of social diversity).
- Zoned Residential Land (encourage Balbriggan as a residential destination with great amenities and public transport nodes).
- Residential Housing (encourage Balbriggan to develop as a life-long option for socially inclusive residency).
- Sports, Amenities, Recreation and Open Space (promote lands for amenity, recreation and sporting purposes at Bremore Regional Park (St Molaga's) to incorporate Bremore Castle, all weather pitch and surrounding lands).

## PART TWO

---

- Harbour and Beach (prepare regeneration plan for the harbour area in consultation with local fishermen, business and community groups, to promote and facilitate local tourism opportunities).
- Tourism and Heritage (restore “Bells Cottage” at the entrance to Bremore Castle lands to facilitate a community group e.g. scout troop, restore the Boat and Bath House Building North East of Bremore Castle, restore the Martello Tower at Bremore, promote and facilitate the development of a raised boardwalk along the beach trail, promote a salt water tidal swimming pool at the location of Black Rock Beach North of Martello Tower, promote the development of a Civic Theatre for Balbriggan, protect the main street of Balbriggan from the proliferation of take aways/ fast food outlets, create visual aspect to denote a Seaside Town at all entrances to Balbriggan, develop and promote a heritage trail).

### **Response of the Chief Executive to the issues raised.**

The detailed contents of the submission are noted and the Council welcomes the positive contribution of the Balbriggan Chamber of Commerce. Fingal County Council seeks to engage with local business and chambers and will continue to progress in this joint manner. The Council recognises the requirement for consultation with businesses and accordingly commits to implementation of the Action Plan for Jobs. The implementation of the strategy will be successfully achieved through engagement, collaboration and partnership with a number of key stakeholders. These include the new structures within Fingal that are focussed on the local economy, the Economic Development and Enterprise SPC and the LEO.

Balbriggan is located in the Hinterland area and will continue to function as the primary centre for economic development and for essential supporting infrastructure provision. The importance of Balbriggan is recognised in Objectives ED82 and ED83, as follows: ED82: ‘Support economic growth within the Hinterland Area through strengthening and promoting the importance of Balbriggan as the major urban centre and directing appropriately scaled growth opportunities into the other urban centres in the Area.’ ED83: Ensure that settlements and locations within the Hinterland Area follow policies of directional development to ensure that the required economies of scale are achieved in specific centres such as Balbriggan, and that other lower tier settlements perform to their economic strengths and competitive advantages such as Skerries and Rush for tourism and marine activities.’ Fingal County Council is committed to working with representative stakeholders such as the IDA, Enterprise Ireland and the local Chamber of Commerce, to attract and facilitate new employment generators into the town. There may be an opportunity for the aforementioned groups to consider the development of a Balbriggan Enterprise Zone similar to the Dublin 15 Enterprise Zone.

The request for an Enterprise Development Officer and new local Enterprise representative specifically employed for Balbriggan is a matter for the Economic, Enterprise and Tourism Development Department and not for the Development Plan process.

Given the strategic nature of the Development Plan, it is considered that the specific items set out in the submission are best dealt with by way of any future Local Area Plan and proposed masterplans for the area while the Local Economic and Community Plan provides a framework of objectives and actions needed to promote and support the economic development and the local and community development of the area (a number of specific action are set out in relation to Balbriggan), both by itself directly and in partnership with other economic and community development stakeholders.

While a number of requests are considered most suitably addressed by the operations department of Fingal County Council, it is noted that the Draft Plan already contains support for

## PART TWO

---

a number of initiatives outlined e.g. provision of Castlelands Link Road, development of Bremore Regional Park, policy to facilitate the restoration and use of Bremore Castle, Bells Cottage, Boat House and the Martello Tower and preparation of a Regeneration Strategy for Balbriggan Harbour. Specific works to property outside of Council ownership is outside the remit of the Council.

Policy has been provided to facilitate the implementation of the Urban Design Framework Plan and Balbriggan Public Realm Plan for the town centre and the delivery of an open space park at Flemington is ongoing.

Having consideration to the functioning nature of the Harbour it is not considered feasible to restrict use of the area to pedestrian access only. The provision of a swimming pool cannot be considered as part of the current plan in absence of a feasibility assessment.

The consideration of particular uses should be assessed on their own merits as part of the Development Management process in line with the zoning objective for the area.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00405

The submission seeks a Development Plan Objective to “facilitate the development of an Islamic community centre including a mosque/place of worship in Balbriggan, and a burial ground at a suitable separate location, for the Muslim community of Balbriggan.”

### **Response of the Chief Executive to the issues raised.**

The merits of the submission are acknowledged. Social inclusion is embedded in the Draft Development Plan with policies in particular focused on aiming to improve access to all groups within society. The Council is committed to developing a more socially inclusive society and promoting participation and access for all. Specific objectives are contained in the Draft Development Plan for a Place of Worship, these are Objectives PM78, PM79, DMS95 and DMS96. A Place of Worship and burial grounds are facilitated within a number of zoning objectives in the Draft Development Plan. Development proposals for the habitual use of a building as a place of public worship or religious instruction will be considered in the context of the land use zoning and the need to protect the amenities of established uses from impacts arising from traffic, noise or other disturbance. There is considerable scope within the Draft Development Plan and through the Development Management process to facilitate the development of a place of worship and burial ground in Balbriggan. Therefore, a new objective is not considered necessary.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00414

The submission seeks an amendment to Flemington Lane Masterplan (MP 4.A) to allow a residential density which reflects the urban edge context (25 per hectare/10 per acre) and respects adjoining residential amenity.

### **Response of the Chief Executive to the issues raised.**

The subject site is located at the northern boundary of Balbriggan. Recent developments in the area have tended to be mainly terraced town houses and apartments. The approach with this Masterplan and density objective is to provide a different style of dwellings to balance the existing residential proposition in Balbriggan. The Plan indicates that a suitable mix of housing

## PART TWO

---

types should be provided in residential areas to meet the needs of residents. Homes, whether apartments, traditional houses or otherwise, should be adaptable to the life stage of those living there. The needs of a family with children are very different to those of a single person or an elderly couple. It is therefore important that a choice of dwelling types, tenure and size are provided to reflect the changing needs in the community.

Having considered the existing housing composition in Balbriggan and in particular northwest Balbriggan, it is clear there is a risk that the existing housing stock will not meet the needs of all life stages of those living in the community. To this end, it is proposed to facilitate a higher proportion of detached low density housing catering for the needs of the varying age profile and household compositions / housing needs of the wider community in the Balbriggan area.

Accordingly, it is considered that low density development to be determined in accordance with a masterplan for the area (no density is proposed in the Plan), is the appropriate mechanism to inform the future development of the area and therefore no change is recommended.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00443

This submission sets out a number of comments and recommendations in relation to the role of the Development Plan and the future development of Balbriggan which can be summarised as follows;

- Potential of Mill Pond Park as a recreational space for the town.
- Request for walking paths and fitness equipment.
- Need for signage and lighting.
- Measures to reduce anti-social behaviour.
- Measures to improve Vauxhall Street.
- Additional OS zoning requested to west of Bridge Street.

### **Response of the Chief Executive to the issues raised.**

The detailed comments of the submission are noted and welcomed. A Part 8 Development was prepared earlier this year for a skateboard park at Mill Pond Park, Balbriggan. As part of the public advertising for this development, reference was made to a masterplan for the immediate area being undertaken by the Parks Department of Fingal County Council. This Masterplan will provide the opportunity for public participation and it is considered a more appropriate local level for which detailed proposals such as those contained in the submission can be considered. Notwithstanding the above, the Draft Development Plan under Chapter 4, Urban Fingal contains objectives relating to Balbriggan which include Objectives Balbriggan 10 & 11 which provide for the improvement of pedestrian and cycle facilities.

It should be noted that policy is in place in the Draft Plan to 'promote and facilitate the development of an ecological corridor along the Matt Stream, including the Town Park west of Vauxhall Street'. The implementation any plan for the area including specific initiatives as set out under the submission is best considered under the operations section of the Council with any private development assessed by way of the Development Management process.

It is considered that adequate open space provision has been zoned in Balbriggan and it is not recommended that additional land are zoned at this location having regard to the topography and site constraints associated with the development of the area for open space purposes

# PART TWO

---

## **Chief Executive Recommendation:**

Objective Balbriggan 16  
*Mill Pond Masterplan*

### *Mill Pond Masterplan*

*Facilitate the development of Mill Pond to provide for passive and active recreational facilities and amenities including a feasibility study to develop the lake for the purposes of wildlife promotion.*

Update Sheet 4 to include Mill Pond Masterplan.

D00446

The submission relates to Chapel and Fullam Street, Balbriggan and requests that tall iron fencing be mounted atop the current low level wall with access via gated entrances at either side of the area with proper level pathway across the area, to reduce/ eliminate anti-social behaviour and seating/benches so the residents can enjoy spending time sitting outside.

## **Response of the Chief Executive to the issues raised.**

The issues outlined are acknowledged. It is considered that these issues are best assessed by Fingal County Council operations department where appropriate and under Council ownership. In relation to the specific activities suggested in relation to anti-social behaviour and policing it is considered that a submission to Joint Policing Committee in this regard would be relevant. This process offers an opportunity to develop greater consultation, cooperation and accountability between An Garda Síochána, Local Authorities and elected local representatives, with the participation of the community and voluntary sector, on the management of policing and crime issues.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00492

Footpaths are sought on road from M1 Exit 6 to Stephenstown Roundabout to make safe for pedestrians who currently share road with traffic.

## **Response of the Chief Executive to the issues raised.**

Proposals for improved connectivity and permeability through a network of convenient and safe walking and cycling routes including pedestrian zones will be examined within the context of the various Local Area Plans, Masterplans, Urban Framework Plans and Public Realm Plans proposed in the Draft Plan for these areas. The Folkstown Little Masterplan MP 4.C will examine issues such as access, safe walking and cycling routes in the preparation of the Masterplan, which will guide development in the Stephenstown area. The associated works raised in the submission will be assessed in the planning and design of the R122 Naul Road Upgrade which is supported at Table 7.1, Chapter 7 of the Draft Plan. The Development Management Process and Capital Works Programme will also facilitate the development of pedestrian and cycling infrastructure.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00507

The submission acknowledges recent growth in population and sets out concerns about more housing, particularly at Bremore. Concerns are also expressed regarding density and lack of facilities in the area.

# PART TWO

---

## **Response of the Chief Executive to the issues raised.**

The recent growth in the area is acknowledged however a range of new social and physical infrastructure such as the roll out new primary and secondary schools (new primary health care centre nearing completion) has been delivered in line with this development.

The Plan includes policy to develop Bremore Regional Park incorporating an Active Recreational Hub including integrated sports facilities to serve Balbriggan and the surrounding area, including plans to facilitate the restoration and use of Bremore Castle, Bells Cottage, Boat House and the Martello Tower as community facilities, with a maritime museum/museum and civic facility to serve the town.

Infrastructural upgrades by way of water, sewerage and roads infrastructure as well as environmental improvements in the town centre has been delivered and Fingal County Council is also committed to the continued development of infrastructure, facilities and services in the area.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00532

The submission seeks to rezone lands at the southern side of Clonard Road from 'RA' to 'MC' to form an extension of the existing Major town Centre lands.

## **Response of the Chief Executive to the issues raised.**

The Fingal Retail Hierarchy has been devised having regard to the classifications of the Retail Strategy for the GDA and through ensuring consistency with the settlement hierarchy of the RPGs for the GDA. The Fingal Retail Hierarchy includes a categorisation of urban centres within the County into retailing levels, identifies the locations of each level, and the type of retail format that is considered appropriate for each level of the hierarchy. The Fingal Planning Department has undertaken analysis of planning applications and retailing trends within the County over the last several years, and completed on-the-ground-surveys of various urban and rural centres throughout the County with differing retail offer and function. Analysis of these investigations and reviews has concluded that retail provision in Fingal remains within the future allocation given to the County by the Retail Strategy for both convenience and comparison floorspace up to 2016. The Retail Planning Guidelines require the planning authorities within the GDA to prepare a multi-authority retail strategy. It is anticipated that a retail strategy for the EMRA will be required within the lifetime of the Development Plan. Due to this Ministerial requirement and mindful of the regional considerations involved in retail planning, it is considered appropriate that any quantitative indications of additional retail floorspace for Fingal over the coming Plan period be guided and determined by a new retail strategy for the EMRA. In this context, it is considered that no new MC zonings/changes to MC zonings should occur in Balbriggan particularly having regard to the extent of the existing zoned land in the town.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00538

The submission seeks inclusion of an objective for Stephenstown Masterplan (MP 4.D) for 'Development of the land to be informed by the guiding principles contained in the 'Stephenstown Urban Design and Landscape Masterplan (2009)'.

# PART TWO

---

## **Response of the Chief Executive to the issues raised.**

The merits of the submission are noted and it is considered appropriate that a policy acknowledging the status of the Stephenstown Urban Design and Landscape Masterplan be included.

## **Chief Executive Recommendation.**

Include bullet point at Stephenstown Masterplan (MP 4.D)

*'The development of lands in this area will be guided by the principles contained in the 'Stephenstown Urban Design and Landscape Masterplan (2009)'*

D00584

The submission raises various traffic related issues e.g. Naul Rd-motorway, Castlelands Road to Skerries Road and proposes that traffic should be directed to the town centre via coast road. It is suggested that a Maritime Museum at Cardy Marina should be provided. The submission also requests a public swimming pool be provided for Balbriggan and that the construction and opening of playgrounds and skate-park be prioritised.

## **Response of the Chief Executive to the issues raised.**

The merits of the submission are acknowledged, however the Plan is not the appropriate mechanism for the delivery of infrastructure. Provision has however been included in the Plan to support the improvement (D00335) of the Naul road (R122) from M1 into Balbriggan and the Castlelands Link Road to the R127. Objective Balbriggan 9 and Objective Balbriggan 4 also support the development of a swimming pool with a sports complex within the town.

Chapter 4 of the Draft Development Plan sets out objectives for the development of Balbriggan. Objective Balbriggan 4 states: 'Develop Bremore Regional Park incorporating an Active Recreational Hub including integrated sports facilities to serve Balbriggan and the surrounding area, including plans to facilitate the restoration and use of Bremore Castle, Bells Cottage, Boat House and the Martello Tower as community facilities, with a maritime museum/museum and civic facility to serve the town.' A Masterplan is currently being prepared for Bremore Regional Park by the Parks and Green Infrastructure Division. Objective Balbriggan 6 states: 'Prepare a Regeneration Strategy for Balbriggan Harbour in consultation with local fishermen, businesses and community groups having regard to its historic character subject to Screening for Appropriate Assessment.' The Masterplan process for Bremore Regional Park and the Regeneration Strategy for Balbriggan Harbour will both provide the opportunity for public participation and it is considered a more appropriate local level for which detailed proposals such as those contained in the submission can be considered.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00621

Balbriggan Objective 7 provides: preserve and improve access to beaches and seashore. It is submitted that this should be replicated in other coastal areas.

## **Response of the Chief Executive to the issues raised.**

The merits of the submission are acknowledged and it is considered appropriate to include reference to other coastal areas.

# PART TWO

---

## **Chief Executive Recommendation:**

Objective BALBRIGGAN 7

Preserve and improve access to the harbour, beaches ~~and~~ seashore, *and other coastal areas* while protecting environmental resources including water, biodiversity and landscape sensitivities.

D00933

The submission sets out a number of recommendations in relation to the future growth of Balbriggan including a request for the allocation of the annual budget based on population size and forecast of population for that area. The submission also seeks zoning changes and planning criteria to facilitate lower density housing in Balbriggan and requests amendments to the procedures associated with the allocation of social housing. A timescale for the delivery of local objectives is sought as is the prioritisation of 78 local objectives relating to Balbriggan. Finally the submission lists a number of items to be tidied or maintained within Balbriggan to make town more attractive to business.

## **Response of the Chief Executive to the issues raised.**

The detailed merits of the submission are acknowledged and welcomed and in this regard the Development Plan is committed to facilitating the development and growth of Balbriggan as the primary service, social, cultural and local tourist centre in north Fingal.

It should be noted, however, that the Development Plan is not considered the appropriate mechanism to deal with budget allocation.

The allocation of projected population growth for the County is set out to be reflective of the settlements position in the County Settlement Hierarchy. Specific densities and locations of this development are then guided by way of LAP/Masterplans relevant to the individual areas in line with infrastructural requirements.

The provision of social housing is carried out in line with an evidence based Housing Strategy which has been prepared for the County having regard to the most recent summary of social housing assessments prepared under section 21 (a) of the Housing (Miscellaneous Provisions) Act 2009.

To ensure a fair distribution of social housing across housing developments, the introduction of the Urban Regeneration and Housing Act 2015 sets out recently revised Part V arrangements in respect of residential developments including elimination of previous options allowing for the fulfilment of Part V obligations by means of the transfer of sites or land elsewhere, or of making cash payment in lieu of Part V obligations. There is a fresh focus on the provision of an element of social housing as an integral part of new housing projects.

The objectives set out in the plan relate to a six year timeframe the delivery of which are best assessed by Fingal County Council operations department

In terms of improvements to the public realm in Balbriggan, in making it an attractive location for business, it should be noted that Objective Balbriggan 2, seeks to 'facilitate the implementation of the Urban Design Framework Plan and Balbriggan Public Realm Plan for the town centre to encourage the regeneration of the identified potential development sites within the town centre'. Further, Objective, Balbriggan 3, seeks to 'cooperate with representative stakeholders in particular the IDA, Enterprise Ireland and the local Chamber of Commerce to attract and facilitate new employment generators into the town'. Specific maintenance issues

# PART TWO

---

associated with publically owned lands are best considered by Fingal County Council's Operational Department.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

**Lusk**

D00034

Concerns are raised regarding the mix of units being provided within the settlement and the need to allow for greater flexibility of movement in the area. Provision of larger units and associated site areas are proposed. Impacts of recent development on the rural community are also highlighted.

**Response of the Chief Executive to the issues raised.**

The merits of the submission are acknowledged and in this regard the Plan is committed to the preparation of the North Lusk Masterplan which will seek to 'provide for larger family type houses to facilitate the upgrading of homes for families of existing two and three bedroom houses. A minimum of 80% of the housing units shall be 4 or more bed family homes, of which a minimum of 50% shall be detached houses'. Chapter 3 also provides policy to support the development of sustainable communities with distinct identities and sense of place in order to create vibrant communities as opposed to spaces for mere functional movement.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00233

The submission outlines a broad range of priorities for Lusk ranging from economic development to infrastructural priorities over the coming years, in the context of community facility requirements. The majority of the requests are dealt with elsewhere throughout this report with the remaining elements addressed hereunder.

The following is sought;

- Residential development to be incremental in line with service provision.
- Urban Framework Plan is welcomed.
- Community requirements.
- Car parking.
- Prioritise ongoing economic development for Lusk. In this regard, promote tourism facilities, sporting and recreational facilities.
- Restoration of Balleally Landfill for open space and recreational uses.
- Improve linkages.
- Preservation of the historic architectural resources of Lusk to be prioritised.
- Objective Lusk 8 to be amended to delete the reference to the 're-thatch'.

**Response of the Chief Executive to the issues raised.**

The merits of the submission are acknowledged and in this regard each masterplan includes a comprehensive phasing mechanism to ensure development of facilities occurs in tandem with residential development. The Plan already provides policy support for a range of the issues outlined including a commitment to protect and conserve the special character of the historic core of Lusk including the area of archaeological potential in the centre of the Town. It is

# PART TWO

intended that the development of a heritage trail to serve Lusk and the surrounding area will contribute towards the future economic development potential of the town.

The former Balleally Landfill site is currently being decommissioned and it is proposed to develop the lands as a Regional Park. This park will include recreational trails and other appropriate recreational uses in the context of the sensitive nature of the lands adjoining Rogerstown Estuary. This park will benefit the residents of Lusk and Rush and the surrounding areas. Pedestrian linkages to this park will be examined as part of the proposed Recreational Trails Plan set out in the Draft Plan.

Having consideration to the specific nature of Objective Lusk 8 which seeks to 'encourage the refurbishment and re-thatch the existing (former thatched shop premise) cottage abutting Church Road' is considered appropriate to remove this objective. Any application for permission on the site should be considered on its own merits as part of the Development Management process and having regard to relevant policy relating to protected structures, where appropriate. In this regard Objective CH37 to commission a study on the thatched buildings of Fingal to examine how to ensure their continued survival still applies with respect to the building.

## **Chief Executive Recommendation.**

Objective LUSK 8

Encourage the refurbishment ~~and re-thatch~~ of the existing (former thatched shop premise) cottage abutting Church Road.

## **North Lusk Masterplan**

*Ensure the preparation of the Masterplan facilitates the development of the lands for the development of a secondary school, community facilities, playing pitches, park land and residential Development to enable comprehensive development of the lands in a proper manner and development is phased accordingly to ensure development of facilities occurs in tandem with the residential Development. Together, these Draft Development Plan commitments are considered to address the issues relating to the RAlet submission and recreational activities, including sports areas in and around the Lusk area. Other elements of the submission are dealt with in Chapters 4 and 8.*

D00244

The submission outlines concerns in respect of sports and recreation amenity provision within Lusk and requests the delivery of the 'Lusk North Recreational Hub prior to the commencement of any further development to serve the town and surrounding area.

## **Response of the Chief Executive to the issues raised.**

The merits of the submission are acknowledged and in this regard each Local Area Plan includes a comprehensive phasing mechanism to ensure development of facilities occurs in tandem with residential development. The Plan already provides the policy support for the development of an active Recreational Hub to serve Lusk and the surrounding area.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00448

The submission states the need for additional recreational facilities to support the existing school and highlights the importance of the delivery of the full 'Lusk Recreational Hub/Lusk

## PART TWO

---

North Town Park'. In relation to access to schools on Raheny Lane it is indicated that vehicular access is limited & congested and it is requested that the Plan considers the provision of parking near RaLET, either in conjunction with the parking for the Recreational Space or at the disused water treatment plant next door to the school. Likewise, the improvement of pedestrian and cycle links on the roads feeding into Raheny Lane are identified as a priority.

### **Response of the Chief Executive to the issues raised.**

The merits of the submission are acknowledged and in this regard each Local Area Plan includes a comprehensive phasing mechanism to ensure development of facilities occurs in tandem with residential development. The Plan already provides the policy support for the development of an active Recreational Hub to serve Lusk and the surrounding area. Access to Rush Lusk ETNS is being dealt with as part of the planning for a new school on the campus, which will increase the length of set-down area. It should be noted that a set-down area has also been constructed within the existing school.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00497

The submission set out suggestions for enhanced cycling and walking routes.

### **Response of the Chief Executive to the issues raised.**

The merits of the submission are noted and in this regard the Plan supports the provision of high quality cycle facilities. Local Area Plans and Masterplans and Recreation Trails plans will promote and facilitate walking routes at a strategic town and village level. It is considered however that the proposals are too specific for inclusion and may be more appropriately considered as part of the implementation of the NTA's Cycle Network.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00571

The submission seeks a study to facilitate a cycle-route connecting Lusk station with Lusk town and to 'carry out an assessment of the area between Lusk station and Lusk By-pass to inform the feasibility of providing a segregated cycle path along this route'

### **Response of the Chief Executive to the issues raised.**

The merits of the submission are noted and in this regard Objective LUSK 9 seeks to create pedestrian/cycle links between Lusk and Balleally; and Lusk and the railway station.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00567

The submission proposes text changes relating to objective LUSK 11 and the text relating to 'Station Road Masterplan' to accommodate a mixed use development. The re-instatement of Objectives 179 and 185 are also requested. Text changes are also proposed to the 'Development Strategy' for Lusk to include reference to 'lands zoned Town Centre.

# PART TWO

---

## **Response of the Chief Executive to the issues raised.**

The inclusion of LO 179 and 185 are considered appropriate in the context of the Station Road Master Plan. It is considered that the designation of lands for particular specific uses are best considered in the context of the masterplan for the area.

## **Chief Executive Recommendation.**

At Station Road Master Plan.

Insert two additional bullet points.

*Ensure, in relation to the phasing and siting of development within the Masterplan boundary area, that the main retail anchor be developed within the central section of this area in a manner which provides for appropriate sustainable integration with the existing town core.*

*Consider a second smaller retail anchor, as well as local commercial/office development, at the eastern end of the Masterplan area, which shall be designed as a nodal gateway building with a strong streetscape urban edge at the eastern approach to Lusk town and which shall only be developed in tandem with a comprehensive development and expansion of the town centre, commencing with the delivery of the main retail anchor centrally within the scheme.*

## **Rush**

D00043

The submission sets out that housing must have infrastructure such as open space, recreation facilities, footpaths, shops etc. in place from the outset of development.

## **Response of the Chief Executive to the issues raised.**

The merits of the submission are acknowledged and in this regard the plan seeks to ensure that development is phased to ensure that the development of facilities occurs in tandem with future development.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00067

Submission seeks relocation of secondary school to the town centre.

## **Response of the Chief Executive to the issues raised.**

It is noted that the provision of new schools is primarily the responsibility of the Department of Education and Skills. In this regard the Department is guided by the Code of Practice on the Provision of Schools and the Planning System (2008). The Code of Practice sets out co-ordinated actions to be taken by Planning Authorities and the Department in planning for the provision of school sites within the planning system.

It should be noted that if alternative sites are considered more suitable, become available or are required in the future, the Council will work with the Department of Education and Skills and other bodies to ensure the development of schools at the optimum locations. The delivery of same will be subject to the requirements of a planning permission including the opportunity for public comment.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00218 / D00415 / D00451/ D00475

# PART TWO

---

## **Response of the Chief Executive to the issues raised.**

The above submissions raise concerns regarding Objective RUSH 21 (MP 6.D), with a request that the provision for Masterplan be removed until further discussions are held with stakeholders. In relation to the proposed master plan it is felt that the objective of having houses facing north is unnecessary. Consultation in relation to the proposed linear park is also sought. Further concerns are set out in respect of the impact of the masterplan on the future development of said lands.

## **Chief Executive Recommendation:**

Objective Rush 21

~~Kilbush Lane Masterplan (see Map Sheet 6B, MP 6.D)~~

Remove MP 6.D from Map Sheet 6B and associated masterplan boundary.

Remove Kilbush Masterplan from text.

## **Response of the Chief Executive to the issues raised.**

The contents of the submission are acknowledged. Having regard to the extent of recent development at Kilbush Lane which has resulted in remaining lands being of an infill nature, it is considered that the removal of the above master plan from the current Plan is appropriate.

The future development of lands in the area are best considered as part of the Development Management process in accordance with the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended) having regard to relevant zoning and policy provision associated with individual sites.

D000236

This submission expresses concern regarding the relocation of St. Josephs School to Kenure and requests that this not occur. The submission also requests that the Council take ownership of the derelict dwellings on Main Street, Rush and provide a park or carpark.

## **Response of the Chief Executive to the issues raised.**

It is noted that the provision of new schools is primarily the responsibility of the Department of Education and Skills. In this regard the Department is guided by the Code of Practice on the Provision of Schools and the Planning System (2008). The Code of Practice sets out co-ordinated actions to be taken by Planning Authorities and the Department in planning for the provision of school sites within the planning system.

It should be noted that if alternative sites are considered more suitable, become available or are required in the future, the Council will work with the Department of Education and Skills and other bodies to ensure the development of schools at the optimum locations.

It is proposed to include a number of objectives (see Chapter 2 Core Strategy and Settlement Strategy) in relation to urban regeneration, areas of disadvantage and derelict sites.

An objective should be included in the Plan which seeks to investigate the potential for a public car park at Rush.

## **Chief Executive Recommendation:**

After Objective Rush 8.

*Investigate the feasibility of a public car parking facility in the Town.*

# PART TWO

---

D00357

The submission expresses serious concerns regarding Objective Rush 12, in relation to the cemetery extension at Whitestown Rush. In this regard it is requested that this objective be revised or removed until a more detailed proposal for facilities at Whitestown Cemetery is agreed. The submission also expresses concerns regarding the proposed carpark proposed in Objective 12 to serve Whitestown Cemetery and it is requested that this objective is reviewed in discussion with local residents prior to the finalisation of any proposals.

### **Response of the Chief Executive to the issues raised.**

The contents of the submission are acknowledged and it should be noted that any future proposal to extend the existing cemetery at Whitestown will involve a full public consultation process where traffic safety and the residential amenities of the area will be fully considered.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00439

The submission acknowledges recent pedestrian improvements in the town however it is stated that pedestrians from Channel Road, South Shore and Rogerstown areas in Rush still have to negotiate Sprout Road where street lighting and traffic calming is requested.

### **Response of the Chief Executive to the issues raised.**

The contents of the submission are acknowledged however it is considered that this issue is best assessed by Fingal County Council operations department.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00450

The submission sets out a number of issues relating to roads, housing, facilities, access/parking, burial spaces at Whitestown cemetery, hotel and slipway provision amongst other issues. The reinstatement of Objectives 5,10,12 from the previous Development Plan is also requested. Comments are also set out in relation to densities, the appearance of the town and the need for an Urban Centre Plan. Public Transport (Objective 8) is acknowledged as important in the development of tourism in the area. The importance of Cultural Identity (Objective 1 of previous Plan) is outlined and the submission seeks the inclusion of a number of Local Objectives as set out in the previous Plan.

### **Response of the Chief Executive to the issues raised.**

The detailed contents of the submission are acknowledged and welcomed. In support of the submission it should be noted that objectives 5 and 10 from the previous Plan have been retained as part of the Draft Plan and the Draft Plan includes provision for the preparation of Kenure Local Area Plan and Kenure South Masterplan which are considered the appropriate mechanisms for the consideration of the remaining specific proposals as set out under the submission including the identification of specific lands for parking. The allocation of projected population growth for the County is set out to be reflective of the settlements position in the County Settlement Hierarchy. Specific densities and locations of this development are then guided by way of LAP/Masterplans relevant to the individual areas in line with infrastructural requirements. The support of policies contained in the Draft Plan are welcomed and it is considered that Objective Rush 1 to Objective Rush 21 are sufficiently robust to facilitate the development of Rush as a vibrant town whilst maintaining its market gardening tradition.

# PART TWO

---

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00458

The submission seeks the removal of MP 6E (Kenure South Masterplan) and the proposed school site in Rush, sheet 6.

**Response of the Chief Executive to the issues raised.**

The merits of the submission are acknowledged, however, the provision of a masterplan at this location is considered necessary to facilitate a co-ordinated, high quality development which provides a relationship with open space and the proposed linear park. The consideration of piecemeal development at this location would be considered contrary to the proper planning and sustainable development of the area. It should be noted that submission of an overall concept/masterplan for the area may be considered as part of any future planning application for development on the subject lands.

It is noted that the provision of new schools is primarily the responsibility of the Department of Education and Skills. In this regard the Department is guided by the Code of Practice on the Provision of Schools and the Planning System (2008). The Code of Practice sets out co-ordinated actions to be taken by Planning Authorities and the Department in planning for the provision of school sites within the planning system.

Indicative school site icons are identified at strategic locations within new development areas, with the exact location, layout and detail to be finalised at planning application stage.

It should be noted that if alternative sites are considered more suitable, become available or are required in the future, the Council will work with the Department of Education and Skills and other bodies to ensure the development of schools at the optimum locations.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00497

The submission requests that no planning permissions be granted until Rush has appropriate waste water treatment provision.

**Response of the Chief Executive to the issues raised.**

The consideration of individual planning applications is determined as part of the Development Management process in accordance with the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended) in consultation with prescribed bodies including Irish water. It should be noted that The Rush network upgrade is currently being progressed by Irish Water and a completion date of late 2018 is envisaged.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00622

The submission states the need for a swimming pool in the area.

# PART TWO

## **Response of the Chief Executive to the issues raised.**

The contents of the submission are acknowledged and in this regard Objective RUSH 18 seeks to 'encourage and facilitate the provision of a swimming pool in Rush'.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00627

The submission sets out a number of comments in relation to Kenure LAP and Rush in terms of consultation on the LAP, better facilities and services, housing, green infrastructure, cultural heritage, roads, public transport, sewage, schools and tourism. In relation to Kenure LAP, concerns are set out in relation to sewerage, roads, cycleways, footpaths, residential areas and sports facilities. It is set out that housing should be provided with appropriate facilities, green infrastructure, better quality low density units and restricted to 2 storeys. The need for additional facilities is set out in line with proposals to regain blue flag status, develop coastal walkways, and develop state of the art health centre. Support for economic development is sought as is a request to reinstate Objective 8 (retail) of previous plan. Green infrastructure/cultural heritage are highlighted alongside the need to preserve the unique horticultural heritage of the area. The need for urban realm improvement is highlighted and it is stated that any development in the area of Church, New Library, Theatre and the Milbank should be in keeping with the cultural heritage character of the town. It is requested that an objective to support feeder buses to/from train station be included and support for a new secondary school is stated however a revised location is suggested.

## **Response of the Chief Executive to the issues raised.**

The detailed contents of the submission are acknowledged and welcomed. The Draft Plan includes provision for the preparation of Kenure Local Area Plan and Kenure South Masterplan which are considered the appropriate mechanisms for the consideration of the specific proposals as set out under the submission. The allocation of projected population growth for the County is set out to be reflective of the settlements position in the County Settlement Hierarchy. Specific densities and locations of this development are then guided by way of LAP/Masterplans relevant to the individual areas in line with infrastructural requirements. The identified site for a school has been carried out in line with Department of Education as part of a consultation process and the delivery of same will be subject to the requirements of a planning permission including the opportunity for public comment. The support of policies contained in the Draft Plan are welcomed and it is considered that Objective Rush 1 to Objective Rush 21 are sufficiently robust to facilitate the development of Rush as a vibrant town whilst maintaining its market gardening tradition. Additional policy is has been provided at Chapter 6 of the plan in relation to retail provision in Lusk in line with the requirement for retail impact assessment (Objective ED37, ED 40 and ED41). Support for a shuttle bus in the town has also already been provided for under the Draft Plan.

### **Chief Executive Recommendation.**

With respect to the above submission, no changes are recommended.

D00696

The submission relates to various issues in Rush. It is stated that the Plan should enshrine the objectives set out in the Fingal Heritage Plan (including the potential of the horticultural sector) and should be community led. It is requested that Heritage and Biodiversity (including open space requirements) should be promoted and concerns are raised regarding the proposed location of the school. The importance of the promotion of sports and provision of addition

# PART TWO

---

facilities is highlighted. It is requested that lower density housing be facilitated in areas where traffic safety is not compromised. The submission sets out recommendations for public realm improvements and states the need to protect the smaller harbours of Fingal.

## **Response of the Chief Executive to the issues raised.**

The detailed contents of the submission are acknowledged and welcomed. The Draft Plan includes provision for the preparation of Kenure Local Area Plan and Kenure South Masterplan which are considered the appropriate mechanisms for the consideration of the specific proposals as set out under the submission. The allocation of projected population growth for the County is set out to be reflective of the settlements position in the County Settlement Hierarchy. Specific densities and locations of this development are then guided by way of LAP/Masterplans relevant to the individual areas in line with infrastructural requirements.

It is noted that the provision of new schools is primarily the responsibility of the Department of Education and Skills. In this regard the Department is guided by the Code of Practice on the Provision of Schools and the Planning System (2008). The Code of Practice sets out co-ordinated actions to be taken by Planning Authorities and the Department in planning for the provision of school sites within the planning system.

It should be noted that if alternative sites are considered more suitable, become available or are required in the future, the Council will work with the Department of Education and Skills and other bodies to ensure the development of schools at the optimum locations. The delivery of same will be subject to the requirements of a planning permission including the opportunity for public comment.

The support of policies contained in the Draft Plan are welcomed and it is considered that Objective Rush 1 to Objective Rush 21 are sufficiently robust to facilitate the development of Rush as a vibrant town whilst maintaining its market gardening tradition.

Fingal County Council has a very proactive Heritage section which includes Heritage, Conservation and Biodiversity officers together with a Heritage Network and Community Network Unit. Fingal's Biodiversity Plan contains a wealth of information on biodiversity in Fingal including sections that enable the public to get involved. The Biodiversity programme on Fingal County Council's website equally provides much scope for Fingalians to participate on specific projects. The Heritage Plan, the Heritage Forum and the Heritage Network provides a stream of information that facilitates and assists in the dissemination of Fingal's Heritage. Additional policy is however recommended in relation to the Fingal Heritage Plan.

## **Chief Executive Recommendation.**

Before Objective GI01.

*Support the implementation of the Fingal Heritage Plan in relation to the provision of Green Infrastructure.*

Before Objective NH01.

*Support the implementation of the Fingal Heritage Plan in relation to the promotion and protection of Fingal's Natural Heritage.*

Before Objective CI01.

*Support the implementation of the Fingal Heritage Plan in relation to the promotion and protection of Fingal's Cultural Heritage.*

# PART TWO

---

D00925

The submission requests the delivery of an astro pitch complex at St Catherine's Rush.

## **Response of the Chief Executive to the issues raised.**

The merits of the submission is noted and in this regard the delivery of infrastructure is not within the remit of the Development Plan however the Draft Plan does support the development of an active Recreational Hub on open space lands north of St. Catherine's to serve Rush and the surrounding area. The issue of delivery of specific pitch developments is best assessed by Fingal County Council operations department.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00932

This submissions seeks that vacant sites in Rush are promoted for use as elderly housing. It also requests that the Council would review the use of an existing road (at the end of Channel Rd, towards Balleally, near Blake's Cross) to act as an alternative for traffic in the Rush area. The submission further seeks for improvements to the green area of boat park at Rogerstown for greater amenity use by locals suggesting the inclusion of benches and picnic tables at this location. In addition, this submission raises issues on the bathing status at Rush.

## **Response of the Chief Executive to the issues raised.**

The contents of the submission are acknowledged and welcomed and in this regard a number of policies are recommended for inclusion in relation to implementation of the Vacant Sites register as provided for under the Urban Regeneration and Housing Act 2015, to address issues of vacancy and underutilisation of lands in town and village centres in Fingal. It is also proposed to include objectives to identify obsolete and potential renewal areas within the County and to encourage and facilitate the re-use and regeneration of derelict land and buildings in the County's urban centres.

The issues outlined in relation to the reopening of previous roads corridors, bathing and the improvements to public amenities are acknowledged, however it is considered that these issues are best assessed by Fingal County Council operations and environment departments.

## **Chief Executive Recommendation:**

See CE DOHPCLG 1.7, CE DOHPCLG 1.8 and CE DOHPCLG 1.9.

## **Skerries**

D00046

The submission is supportive of the provision of facilities for sporting bodies and particularly supportive of Holmpatrick Masterplan and its open space requirements. Open space areas in Kellys Bay, Mourne View and Skerries Rock and under the Ballast pit Masterplan are also supported positively.

## **Response of the Chief Executive to the issues raised.**

Support for the Plan policies is welcomed and the council is committed to the improvement of facilities across the County.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

# PART TWO

---

D00057

Submission acknowledges the development plan is excellent in addressing many of the overarching concerns regarding to development in Fingal. Specifically the submission raises how these should be reflected with regard to Barnageeragh Cove and associated Masterplan 5.A.

A number of proposed amendments are set out in relation to Chapter 4 the following suggested amendments are made:

Master Plan 5.A: Scope (and map) should be extended to include R127 coastal route and also Barnageeragh road link. The Open Space to the south and east should also be included. Completed residential areas and potential links to Kellys Lane should be within the boundary and scope of the Masterplan.

Objective SKERRIES11 & Barnageeragh Masterplan should refer to the need for a safe pedestrian passage to be provided as a matter of urgency along the R127 towards Skerries as well as the broader need to integrate the Barnageeragh Cove development that is nearing completion.

A Local Map Based Objective should be added to Map 5 (and described in Appendix 6) to the effect of “investigate provision of a safe pedestrian walking route from Barnageeragh Cove development to the existing footpath on the R127 at the earliest opportunity”. These are consistent with facilitating the broader objectives of the Development plan and Masterplan, relating to provision of roads, a coastal walk / cyclepaths integrating the new development to local services and amenities.

Objective SKERRIES 11: Barnageeragh Masterplan should refer to the completion of the road infrastructure, the Barnageeragh Link and the R127 upgrade at Barnageeragh. A Local Map Based Objective should be added to Map 5 (and described in Appendix 6) to the effect of “complete construction of the Barnageeragh Link and upgrades to the R127 at Barnageeragh”, especially given the inclusion of a similar reference to the design of a Southern Relief road.

The Recreational Strategy should also include Barnageeragh Cove (in addition to Kellys Bay, Mourne View and Skerries Rock mentioned), including pedestrian connectivity between the same residential areas

Amendments proposed to facilitate a public pool in place of a hotel proposed under the Holmpatrick Masterplan.

Objective SKERRIES 4 & Objective SKERRIES 11 (Barnageeragh Masterplan). Bus route and scheduling suggestions are set out.

It is proposed that Objective Skerries 11 & Barnageeragh masterplan is amended to also refer to the expired Local Area Plan, indicating that the plan’s objectives remain relevant under the new Development Plan and can be incorporated in the Masterplan where relevant.

## **Response of the Chief Executive to the issues raised.**

Support for the Plan policies is welcomed and it is considered that the Masterplan for the area will address issues such as enhanced permeability and connectivity within Masterplan lands and adjoining areas. It is considered that the existing objectives of the Draft Plan are sufficiently robust and cater for the issues set out in the submission in promoting the future development of Skerries as a vibrant local centre. The extension or review of any LAP is subject to its own statutory process with the County Development remaining the parent document in the interim. The delivery of specific projects is best assessed by Fingal County Council operations department.

In relation to the Barnageeragh Masterplan MP 5.A, while it is noted that a planning permission F05A/1818 is in place on the site which deals with the holistic development of the area, it is considered appropriate that the requirement for a Masterplan be retained on Sheet 5, pending implementation of said planning permission.

## PART TWO

---

It is noted that the OS zoning as proposed in the Draft Development Plan does not align with the original landscape and open space proposals for the overall lands and may prejudice the overall phased delivery of Open Space in tandem with residential development. This zoning should be amended accordingly.

It is a requirement for the Barnageeragh Cove development to tie-in to the R127. The detailed design of the junction is currently being developed having regard to a number of constraints. Any additional walking routes should be investigated but not included in the CDP.

**Chief Executive Recommendation:**

Rezone lands in Barnageeragh from OS to RA.

D00403

The submission relates to lands within Holmpatrick Masterplan MP5C and requests the removal of an area which has been indicated for housing. Concerns are raised in relation to any future proposal to in terms of impact on the surrounding area, traffic implications for the R128 (Rush Road), visual impact and associated concerns.

**Response of the Chief Executive to the issues raised.**

Lands have been identified to meet the needs of the County over the duration of the Plan period in line with the Core Strategy and County Settlement Strategy. The preparation of Masterplans has been identified to assist in achieving quality developments in terms of, inter alia, urban design, structure, delivery of community/amenity facilities and permeability. Subsequent planning applications will be required to adhere to the approved Masterplans. Each application for permission is then assessed on its own merits having consideration to range of considerations (such as the need for high quality design at this sensitive location) including those issues outlined in the above submission with opportunity for public engagement in the process.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00428

This submission sets out a request for exclusive use of the Ballast Pit for foreseeable future including a zoning to ensure long term availability of lands to GAA. Additional ground work has been identified as being required to prevent subsidence which is identified as occurring during long periods of rain. There is a request that consideration is given for an additional GAA pitch for exclusive use of club.

**Response of the Chief Executive to the issues raised.**

The contents of the submission are acknowledged however the importance of the Ballast Pit as a recreational amenity in Skerries to cater for the wider community should be recognised. Having consideration to the aim of the proposed Ballast Pit Masterplan MP 5.B to 'facilitate mixed use development requiring the inclusion of community/recreational uses and park and ride facilities to serve the railway station' it is considered that any revision to restrict its future use would be inappropriate. Fingal County Council recognises the important role played by the local GAA Club and is committed to future engagement and co-operation with all clubs in the community. The issues of maintenance of the grounds are not considered to fall within the remit of the Development Plan and are best assessed by Fingal County Council operations department.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

# PART TWO

---

D00432

The submission seeks exclusive use of Kelly's Bay pitch for the local soccer club, with the provision of an additional car drop of area and widened entrance. It is indicated that an additional pitch is also required at Barnageeragh Cove. Finally it is requested that, in the event of a grant of planning permission in the vicinity of Holmpatrick Cove, that open space is provided for an additional pitch for exclusive use by club.

## **Response of the Chief Executive to the issues raised.**

The Council will fully engage with all community groups/sports organisations in the provision of open space for recreational purposes within the County. While the Council acknowledges the submissions seeking exclusive use of certain pitches in Skerries, it is not considered to be in the best interests of the community to limit the use of recreational facilities to one group/organisation at the expense of other groups within the community. This is explicitly set out in Objective PM53 as follows: 'Ensure intensive recreational/amenity facilities are not used exclusively by any one group.'

Chapter 4 of the Draft Development Plan sets out a number of objectives to address recreational issues in Skerries, as follows: Objective Skerries 5: 'Prepare a Recreational Strategy for open space lands at Kellys Bay, Mourne View, and Skerries Rock'; Objective Skerries 8 states: 'Prepare an Urban Framework Plan to guide and inform future development of the harbour area incorporating mixed-use development including community/recreational and marina/water sports facilities with improved accessibility including enhanced off-street car-parking. Both of these objectives will provide an opportunity for the public and interested parties to participate in the location of recreational activities in Skerries. Masterplans for Barnageeragh (MP 5.A) and Holmpatrick (MP 5.C), both named in the submission, are provided for in the Draft Development Plan. With respect to recent planning activity in the Barnageeragh area, the landscaping plans that include playing pitches are currently going through the transfer procedure from the developer to the Council.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00491

This submission sets out a number of comments and recommendations in relation to the role of the Development Plan and the future development of Skerries which can be summarised as follows;

- Removal of both GE zoning and the MP 5D relating to same (Skerries map 5) with the designated lands relocated east of the railway line or at the Ballast Pit site where the General Employment zoning can either replace or be incorporated into the Ballast Pit Masterplan.
- Amendment to the Ballast Pit Masterplan, to extend the proposed cycleway to the Skerries Point Shopping Centre.
- References in the Development Plan to the provision at the Ballast Pit site of park and ride facilities to serve the railway station are welcome however parking concerns are outlined.
- Request for the preparation of an accessibility/permeability assessment to inform a public realm strategy focusing on accessibility and permeability for all.
- Removal of the Milverton master plan.
- Provision of a swimming pool is welcomed and policy in this regard should be strengthened.
- Inclusion of a masterplan for Town Park.

## PART TWO

---

- Support the provision of a performance and exhibition space.
- Provision of youth facilities.
- Update all reference to Fingal Coastal Way to include cycling.
- Policy to support town centre and retail function whilst protecting distinctiveness of the town (reference Shenick & Skerries Point).
- Support the provision of co-working spaces.
- Inclusion of Balbriggan-Skerries-Coastal & Rural Circulation Route.

A number of further map based recommendations are also set out in the submissions which are dealt with at Map Sheet 5: Skerries.

### **Response of the Chief Executive to the issues raised.**

The detailed submission is noted and it is considered appropriate that the Plan be extended to include an indicative pedestrian cycle line to Skerries Point centre.

The Draft Plan is supportive of increased accessibility and permeability and recognises its contribution to placemaking. In this regard the Plan supports the implementation of the Design Manual for Urban Roads and Streets (DMURS) which sets out design standards for urban roads and streets which balance the “place function” (i.e. the needs of residents and visitors) with the “transport function” (i.e. the needs of pedestrians, cyclists, public transport, cars and goods vehicles). The manual gives guidance on the layout of new developments (with a view to maximising permeability for sustainable modes), and on the design of individual roads and streets taking into account streetscape, and urban design as well as engineering. The focus is on providing streets that are good places to live, work and play in, while providing appropriate capacity for pedestrians, cyclists, public transport and cars. The use of the Manual is mandatory for all Local Authorities. An additional objective supporting improved permeability should however be considered in this context.

It is considered that the existing long established GE zoning which forms part of the consolidated town is appropriate and necessary to facilitate the future employment potential of Skeeries and as such should be retained in its current format. Further the preparation of the Milverton master plan is necessary to provide a framework for the future development of these lands which ensures the provision of integration to the zoned lands at Ballast Pit.

It is considered that Objective Skerries 6 is sufficiently robust to encourage and facilitate the provision of a swimming pool in Skerries.

The important role that Skerries plays in contributing to the County’s cultural heritage is recognised and in this regard support for the arts and literature is provided at Objective Skerries 1, which seeks to promote the development of Skerries as a vibrant local service, social and cultural centre and promote local tourism.

The provision of a number of masterplans in Skerries will seek to ensure that the town develops in line with the provision of necessary infrastructure including community infrastructure and in this regard an additional objective setting out this aim should be included in the Plan. It should be noted that a recreational masterplan for Town Park has been prepared and policy supporting its implementation should be included in the Plan.

Having regard to the sensitive nature of the landscape designation, the inclusion of reference to cycling as part of the Fingal Coastal Way is considered inappropriate in the absence of a feasibility assessment with associated environmental assessments.

## PART TWO

Skerries is classified as a Level 3 centre in Table 6.1 Fingal Retail Hierarchy. Level 3 of the Fingal Retail Hierarchy includes key urban centres well distributed geographically throughout the County, with significant resident-populations and also serving wider catchment areas, some into rural areas. This retail tier includes Balbriggan, Malahide, Skerries, Charlestown, Donabate, Lusk and Rush. While these towns are unique with distinctive characters and historic development, they perform and have further potential to perform over the Draft Plan period to a higher retailing level due to the strength of their resident-population and catchment-population. These Town Centre locations have at least one convenience store, a range of middle order comparison retailers and a range of supporting retail services. The Council's policy in relation to these Town Centres is to consolidate and enhance their retailing functions balanced with the wider range of leisure, community and civic functions they offer. Objectives ED40-42 set out the retail objectives relating to Level 3 centres.

The submission made with regard to retail centres at Shenick Road and Skerries Point is welcomed. These centres in Skerries are Holmpatrick Shopping Centre located on Shenick Road, and Skerries Point Shopping Centre, Kelly's Bay Parade, Skerries. Both of these centres contain the LC Local Centre zoning and are important centres which support residential development at Hacketstown and Barnageeragh respectively. It is recommended that these two Local Centres be included as Level 5 centres in Table 6.1 Fingal Retail Hierarchy. The designation of Skerries as an ACA is provided in the interest of protecting the distinct character of the town.

The Draft Plan supports the co-working spaces and home based economic activity and it is considered that additional text and an objective should be included to address the issue of co-working spaces.

The proposed Balbriggan to Skerries pedestrian and cycle scheme has been subject to detailed design and the CPO process is being finalised. The Council is fully committed to the development of this route and it is considered appropriate to include such an objective in the Draft Plan.

### **Chief Executive Recommendation:**

Include an indicative pedestrian cycle line to Skerries Point centre– Sheet 5 mapping change.

Before Objective SKERRIES 4

*Promote and facilitate increased permeability and accessibility for those using active travel modes, prams, wheelchairs, personal scooters and other similar modes.*

Before Objective SKERRIES 4

*Support the delivery of the Balbriggan to Skerries pedestrian and cycle scheme.*

Before Objective SKERRIES 2

*Continue to support the delivery of enhanced recreational, community, social, youth and educational facilities to the area.*

Objective SKERRIES 11

*Skerries Town Park Masterplan*

Update Map Sheet 5

Include additional text in 2<sup>nd</sup> paragraph of Page 232, Chapter 6 under the heading 'Incubation Units, Workshops, Starter Units and Home Working', as follows:

## PART TWO

*Co-working is a style of work that involves a shared working environment, often an office, and independent activity. Unlike in a typical office environment, those co-working are usually not employed by the same organisation. The concept of co-working is suitable for start-ups, entrepreneurs and freelancers. Opportunities exist where vacant/underused properties are available and can be used for co-working. The Council will support the concept of co-working, where appropriate.*

Objective ED103:

Promote the provision of workspace units, *including co-working* for SMEs, start-up companies and *freelancers* in general and with particular emphasis on ensuring their provision within large schemes to offer opportunities associated with clustering and networking.

D00618

The submission sets out a need for additional facilities for the local athletics club, including training track with flood lighting and an open for all national standard track and field Astro running track in conjunction with all-weather pitches and ancillary facilities.

### **Response of the Chief Executive to the issues raised.**

The content of the submission is acknowledged and Fingal County Council will fully engage with any specific clubs regarding future requirements within the context of the Town Park generally.

### **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00700

The submission relates to lands south of Balhavil Lane and seeks a local objective to develop a Retirement/Nursing Home facility. It is indicated that there is a willingness to cede land for coastal path as part of the submission.

### **Response of the Chief Executive to the issues raised.**

The insertion of a Local Objective for a 'Retirement/Nursing Home Facility, Sheltered Accommodation and 20 detached residential units' at Balhavil Lane, Skerries is not considered appropriate. The proposed uses included in the Local Objective are not permitted under the GB and HA zonings on the site. The inclusion of a map based Local Objective, which would not be consistent with the policies and objectives contained in the provisions of the relevant chapter of the Development Plan or Appendices are legally flawed and open to legal challenge. Any local objectives that render nugatory relevant policy considerations including Guidelines cannot be considered to be consistent with the principles that inform these policy considerations and adopted criteria. There is a lack of an evidence based need or planning rationale for the objective, therefore the inclusion of the proposed objective would conflict with the policy and guidance outlined above. Chapter 3 of the Draft Plan recognises that the provision of residential care is an essential community requirement. Although there has been pressure for such facilities in rural areas, there is presumption against this type of development in the open countryside for reasons relating to sustainability, poor accessibility and lack of public transport, social exclusion and isolation. Best practice dictates that residential care, retirement and nursing homes should be located in built-up areas and should be located close to shops and other community facilities required by the occupants, and should be easily accessible to visitors, staff and servicing traffic. Objective PM 43 specifically requires that residential care homes, retirement homes, nursing homes and retirement villages be located in towns and villages for reasons of sustainability, accessibility, social inclusion, and proximity to the availability of services, except where a demonstrated need to locate in a rural environment because of the nature of the care required can be clearly established.

# PART TWO

## Chief Executive Recommendation:

With respect to the above submission, no changes are recommended.

## Balrothery

D00554

A detailed submission has been received from Balrothery Community Association, requesting that existing objectives in the current Development Plan are carried out and broadly welcoming the new Objectives in the Draft Plan subject to some amendments as follows;

Objective Balrothery 3 -Facilitate and encourage improved village facilities, both commercial and community to meet the needs of the existing and expanding village community, *but not to permit any additional fast-food/take-away outlets or bookmakers.*

Objective Balrothery 5 -Seek the development of a new pedestrian & cycle route from Balrothery to Ardgillan Demesne from Old Coach Road, Darcystown Road or any other approved route.

Request a number of new objectives BALROOTHERY 7 - 14 - these are specified in the submission and cover a range of subject matters. In particular proposal Objective BALROOTHERY 7 which seeks a for a new Masterplan to be prepared for works and phasing of works ( list of 31 items specified - with accompanying map) particularly as LAP has expired.

Seek an additional Objective requesting that a Masterplan be prepared.

OB8: To facilitate the extension of the existing community centre having regard to current and future needs of the community.

OB9: Develop a Village Heritage Trail interpreting the built and natural Heritage of Balrothery.

OB11: To preserve Blackhall House and Glebe House and their grounds.

OB12: To ensure any future residential development on the periphery of balrothery is to be low-density housing i.e. maximum of 10 houses per Hectare to provide a natural transition from existing high-density housing within the village into the rural area surrounding Balrothery. This objective to apply to existing 'RS' zoned lands that are undeveloped and any future 'RS' zoned lands.

OB13: To develop a traffic management and public parking strategy for Balrothery in conjunction with Balrothery Community association.

OB14: To include continuation of existing limestone walls around graveyard and to compliment same with wall along Bracken River.

## Response of the Chief Executive to the issues raised.

The detailed issues raised in the submission are acknowledged and welcomed. The proposals outlined are considered overly specific having consideration to the strategic nature of the Development Plan and it is considered that the existing objectives which seek to 'protect and enhance the unique physical character and environment of this historic village' are sufficient to accommodate the additional proposals asset out under the submission save for those recommended below. Further the above considerations are considered best addressed as part of the preparation of the Balrothery East Masterplan. It is not considered that any further masterplans are required in this area having consideration to the existing physical development of the village. The existing density for the area is considered appropriate and in line with the County Settlement Hierarchy.

Objective Balrothery 5 seeks 'the development of a new access route to Ardgillan Demesne from either the Old Coach Road or Darcystown Road, Balrothery; or Tanner's Lane, Balbriggan'. Additionally Local Objective 5 seeks to 'prepare a Recreational Strategy for Ardgillen Demesne with an emphasis on enhancing access'. Having regard to these objectived and given the sensitive landscape context, it is considered that the potential for future pedestrian and cycle routes should be carefully examined in consultation with community interests and associated landowners.

# PART TWO

---

In terms of traffic management for the village and car parking the Council is currently investigating traffic management through its Operations Department and it is considered that a landscape master plan at Glebe Park is the most suitable mechanism for the consideration of parking in this area.

The recommendations set out in association with Objective 7 are acknowledged, however they are best considered by Fingal County Council operations department working in conjunction with Community association.

It is considered that an objective to support the preparation of a landscape Masterplan for Glebe Park to facilitate active and passive recreation and improved connectivity with other open spaces and recreational amenities in Balrothery should be included.

In response to the proposed change to Balrothery 5, the consideration of particular uses should be assessed on their own merits as part of the Development Management process in line with the zoning objective for the area.

Blackhall House and Glebe House are listed for protection as Protected Structure at Appendix 2 of the Plan. Associated policy seeks to 'encourage the sympathetic and appropriate reuse, rehabilitation and retention of Protected Structures and their grounds including public access seeking that the Protected Structure is conserved to a high standard, and the special interest, character and setting of the building preserved. In certain cases the relaxation of site zoning restrictions may be considered in order to secure the preservation and conservation of the Protected Structure where the use proposed is compatible with the existing structure and this will only be permitted where the development is consistent with conservation policies and the proper planning and sustainable development of the area'. Accordingly, no further objective is necessary in this regard.

## **Chief Executive Recommendation.**

After Objective BALROTHERY 6

*Prepare a Masterplan for Glebe Park, to improve passive supervision, improved connectivity, accessibility and permeability of the park and to develop additional passive and active recreational facilities and amenities.*

*Support the development of a Village Heritage Trail interpreting the built and natural Heritage of Balrothery in conjunction with local community groups.*

Update Sheet 4 to include Masterplan for Glebe Park.

## **Loughshinny**

D00465

The submission suggests that it would be prudent to carry out an LAP for the village identifying future facility requirements in line with its recent incremental development.

## **Response of the Chief Executive to the issues raised.**

The submission shows an indicative LAP boundary which includes an extensive area of RU and HA lands encircling the existing village. While the submission does not seek the rezoning of these lands, their inclusion as part of a LAP boundary would serve no purpose other than perhaps raise expectations for future rezoning where it has not been demonstrated that a need exists at this sensitive landscape location.

# PART TWO

---

Given the built out nature of Loughshinny, it is not considered that there is an evidence based need for a further land use plan for the area is necessary with future development proposals most appropriately dealt with through the development management process.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

**Kinsealy**

D00228

The submission raises concerns relating to traffic arising from new developments, particularly at the Kinsealy church junction.

**Response of the Chief Executive to the issues raised.**

The issues set out in the submission and acknowledged and in this regard the Plan provides for the realignment of the R107 to address the issue in the medium- to long-term. Any short term solutions are best considered in the context of any future LAP for the area.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00229

The submission considers that housing types and densities associated with Kinsealy are not appropriate (Coopers Wood and Emsworth). Chapter 5

**Response of the Chief Executive to the issues raised.**

The allocation of housing unit numbers for the entire County area has been thoroughly analysed and addressed in the context of the Core Strategy of the Draft Plan 2017-2023 based on the directions contained in the RPG's. The allocation of new population growth and housing numbers within Kinsaley supports the settlement hierarchy contained within the settlement strategy as defined within the Draft Plan. In terms of housing type, the Draft Plan contains policy to ensure that a suitable mix of housing type and tenure is available within the villages. Specific house types will be subject to Development Management process.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00456

The submission supports proposals to rezone lands to a GE Zoning and to include these lands in the MP 12A Study (Kilshane masterplan).

**Response of the Chief Executive to the issues raised.**

The positive support of the submission is welcomed.

**Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00621

The submission sets out concerns that objectives have been carried forward from the previous Development Plan with no timelines and therefore look aspirational.

# PART TWO

---

## **Response of the Chief Executive to the issues raised.**

The objectives included in the Plan are considered to be strategic in nature and appropriate to the themes to which they relate. The Development Plan provides a policy framework against which future development proposals are assessed and facilitates the delivery of said objectives on the ground.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

D00582

The submission seeks the removal of the provision for the creation of Masterplans from the Development Plan to be replaced by developer-led area plans which may then be agreed with the Local Authority at planning application stage.

## **Response of the Chief Executive to the issues raised.**

It is the purpose of masterplans are to consider the wider holistic development of areas having consideration to urban conservation, public transport requirements, pedestrians and cyclists facilities and proposals to minimise the impact of private car based traffic whilst enhancing and developing the existing urban fabric. Accordingly it is considered that this existing framework is appropriate to guide future development and no further amendment is necessary.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

## **Other.**

D00765

The above submission seeks the promotion of harbours through the inclusion of the following; 'Fingal County Council will seek to develop facilities in those harbours for which it is responsible, in part by maintaining good communications and cooperation between recreational and commercial harbour users, achieved by the appointment of a qualified and proactive Fingal County Council Harbour Master and staff.'

## **Response of the Chief Executive to the issues raised.**

The content of the submission is acknowledged and the Draft Plan includes a number of objectives at Chapter 6 and Chapter 10 of the plan which seek to promote the development and regeneration of harbours within the County. Specifics in relation to the running of any harbours are best considered by Fingal County Council operations department.

## **Chief Executive Recommendation:**

With respect to the above submission, no changes are recommended.

## **Summary of Chief Executive Recommendations:**

### **CE CH 4.1**

MT 28, Table 7.1:

~~the Brackenstown link~~ – the Highfield link.

### **CE CH 4.2**

Separate Seatown Masterplan (MP8D) into two separate Masterplans. The existing distributor road shall be the boundary (see appendices).

# PART TWO

Include new objectives as follows:

## **Seatown North MasterPlan**

- *Future development shall provide a strong urban edge with attractive elevations which satisfactorily address, overlook and provide a high degree of informal supervision of the R132 and the east-west distributor road going through Swords Business Park.*
- *Provide for appropriate relationship and integration of development with the R132 and the proposed new Metro North at this location.*
- *Higher/denser development shall provide a key urban edge adjoining the R132 and the east-west distributor road.*
- *Lower density family houses may be considered along the northern part of these lands adjoining Seatown Road.*
- *Provide for the protection of the residential amenities of existing housing adjoining the subject lands by minimising visual intrusion, overlooking and overshadowing and additional traffic.*
- *Reserve a School site as required in consultation with the Department of Education and Skills.*
- *Retain and consolidate existing trees and hedgerows within and bounding the Master Plan lands in as far as is practicable.*
- *Develop direct, attractive and overlooked pedestrian and cycle routes within the subject lands and connecting these lands to the proposed new Metro North; Swords town centre, Seatown Road and the Malahide Estuary.*
- *Provide for the proposed Sutton to Swords cycle route along the east- west distributor road.*
- *Provide for appropriate uses and layout on lands adjoining the M1*

## **Seatown South Masterplan**

- *Future development shall provide a strong urban edge with attractive elevations which satisfactorily address, overlook and provide a high degree of informal supervision of the R132 and the east- west distributor road going through Swords Business Park.*
- *Provide for an appropriate relationship and integration of development with the R132 and the proposed new Metro North at this location.*
- *Provide for a vehicular connection between the subject lands and the Malahide Road.*
- *Higher/denser development shall provide a key urban edge adjoining the R132 and the east-west distributor road.*
- *Lower density family houses may be considered along the southern parts of these lands adjoining existing residential development.*
- *Provide for the protection of the residential amenities of existing housing adjoining the subject lands by minimising visual intrusion, overlooking and overshadowing and additional traffic.*
- *Retain and consolidate existing trees and hedgerows within and bounding the Masterplan lands in as far as is practicable.*
- *Develop direct, attractive and overlooked pedestrian and cycle routes, within the subject lands and connecting these lands to the proposed new Metro North; Swords town centre and the Malahide Estuary.*
- *Provide for appropriate uses and layout on lands adjoining the M1.*
- *Reserve a school site as required in conjunction with the Department of Education and Skills.*

## **CE CH 4.3**

Fosterstown Master Plan.

*Consider the provision of a hotel at a suitable location within the Fosterstown lands.*

## **CE CH 4.4**

Remove the playing pitches at Verona from Figure 6.2 Blanchardstown Core Retail Area (see appendices).

# PART TWO

---

## **CE CH 4.5**

Amend zoning to reflect CI activities at Connolly Hospital (see appendices).

## **CE CH 4.6**

Insert a Local Objective to provide for a bus-gate between Huntstown Wood and Littlepace.

## **CE CH 4.7**

Lands at Castleknock College to be incorporated into the 'development area' of Castleknock (see appendices).

## **CE CH 4.8**

Old School House Masterplan.

Insert additional bullet point.

*Provide for a recreational/tourism hub at this location facilitating a linear public park in addition to tourism related uses such as short-stay accommodation, restaurants and craft shops to be scaled and designed in a sensitive manner to reflect the sensitive environment.*

## **CE CH 4.9**

Remove reference to density of 10 units per hectare on Sheet 9 (see appendices).

Streamstown Masterplan

*Facilitate low density residential development reflective of the character of the area.*

The lands will be the subject of a detailed flood risk assessment.

(See also sheet 9 for related recommendations).

## **CE CH 4.10**

Remove lands between Old Ballymun Road and the R108 from Masterplan 11 A.

## **CE CH 4.11**

Objective CHARLESTOWN AND MEAKSTOWN 1

Develop an enhanced community identity within Fingal through the improvement of *social, cultural, community and residential amenities. Support the development of a sense of identity for the area including improvements to signage, landscaping and physical appearance and through the promotion of mixed uses, including residential, in Charlestown Centre.*

## **CE CH 4.12**

Objective Portrane xx

*Prepare a study to decide on the optimal future development of lands in the Burrow area, having regard to the local issues of coastal erosion, flooding, drainage and the significant landscape and biodiversity sensitivities in the area including a Flora Protection Order, Special Protection Area (SPA), Natural Heritage Area (NHA), Special Area of Conservation (SAC) and designated Ecological Buffer Zone.*

## **CE CH 4.13**

Objective Balbriggan 16

*Mill Pond Masterplan*

*Mill Pond Masterplan*

*Facilitate the development of Mill Pond to provide for passive and active recreational facilities and amenities including a feasibility study to develop the lake for the purposes of wildlife promotion.*

Update Sheet 4 to include Mill Pond Masterplan (see appendices).

# PART TWO

---

## **CE CH 4.14**

Include bullet point at Stephenstown Masterplan (MP 4.D)

*The development of lands in this area will be guided by the principles contained in the 'Stephenstown Urban Design and Landscape Masterplan (2009)'*

## **CE CH 4.15**

Objective BALBRIGGAN 7

Preserve and improve access to the harbour, beaches and seashore, and other coastal areas while protecting environmental resources including water, biodiversity and landscape sensitivities.

## **CE CH 4.16**

Objective LUSK 8

Encourage the refurbishment and re-thatch of the existing (former thatched shop premise) cottage abutting Church Road.

## **CE CH 4.17**

### **North Lusk Masterplan**

*Ensure the preparation of the Masterplan facilitates the development of the lands for the development of a secondary school, community facilities, playing pitches, park land and residential Development to enable comprehensive development of the lands in a proper manner and development is phased accordingly to ensure development of facilities occurs in tandem with the residential Development. Together, these Draft Development Plan commitments are considered to address the issues relating to the RAlet submission and recreational activities, including sports areas in and around the Lusk area. Other elements of the submission are dealt with in Chapters 4 and 8.*

## **CE CH 4.18**

At Station Road Master Plan.

Insert two additional bullet points.

*Ensure, in relation to the phasing and siting of development within the Masterplan boundary area, that the main retail anchor be developed within the central section of this area in a manner which provides for appropriate sustainable integration with the existing town core.*

*Consider a second smaller retail anchor, as well as local commercial/office development, at the eastern end of the Masterplan area, which shall be designed as a nodal gateway building with a strong streetscape urban edge at the eastern approach to Lusk town and which shall only be developed in tandem with a comprehensive development and expansion of the town centre, commencing with the delivery of the main retail anchor centrally within the scheme.*

## **CE CH 4.19**

Objective RUSH 21

~~Kilbush Lane Masterplan (see Map Sheet 6B, MP 6.D)~~

Remove MP 6.D from Map Sheet 6B and associated masterplan boundary (see appendices).

Remove Kilbush Masterplan from text.

## **CE CH 4.20**

After Objective RUSH 8.

*Investigate the feasibility of a public car parking facility in the Town.*

# PART TWO

---

## **CE CH 4.21**

Before Objective GI01.

*Support the implementation of the Fingal Heritage Plan in relation to the provision of Green Infrastructure.*

## **CE CH 4.22**

Before Objective NH01.

*Support the implementation of the Fingal Heritage Plan in relation to the promotion and protection of Fingal's Natural Heritage.*

## **CE CH 4.23**

Before Objective CI01.

*Support the implementation of the Fingal Heritage Plan in relation to the promotion and protection of Fingal's Cultural Heritage.*

## **CE CH 4.24**

Rezone lands in Barnageeragh from OS to RA (see appendices).

## **CE CH 4.25**

Include an indicative pedestrian cycle line to Skerries Point centre– Sheet 5 mapping change.

## **CE CH 4.26**

Before Objective SKERRIES 4

*Promote and facilitate increased permeability and accessibility for those using active travel modes, prams, wheelchairs, personal scooters and other similar modes.*

## **CE CH 4.27**

Before Objective SKERRIES 4

*Support the delivery of the Balbriggan to Skerries pedestrian and cycle scheme.*

## **CE CH 4.28**

Before Objective SKERRIES 2

*Continue to support the delivery of enhanced recreational, community, social, youth and educational facilities to the area.*

## **CE CH 4.29**

Objective SKERRIES 11

*Skerries Town Park Masterplan*

Update Map Sheet 5 (see appendices).

## **CE CH 4.30**

Include additional text in 2<sup>nd</sup> paragraph of Page 232, Chapter 6 under the heading 'Incubation Units, Workshops, Starter Units and Home Working', as follows:

*Co-working is a style of work that involves a shared working environment, often an office, and independent activity. Unlike in a typical office environment, those co-working are usually not employed by the same organisation. The concept of co-working is suitable for start-ups, entrepreneurs and freelancers. Opportunities exist where vacant/underused properties are available and can be used for co-working. The Council will support the concept of co-working, where appropriate.*

## **CE CH 4.31**

Objective ED103:

# PART TWO

---

Promote the provision of workspace units, *including co-working* for SMEs, start-up companies *and freelancers* in general and with particular emphasis on ensuring their provision within large schemes to offer opportunities associated with clustering and networking.

## **CE CH 4.32**

After Objective BALROTHERY 6

*Prepare a Masterplan for Glebe Park, to improve passive supervision, improved connectivity, accessibility and permeability of the park and to develop additional passive and active recreational facilities and amenities.*

Update Sheet 4 (see appendices)

## **CE CH 4.33**

*Support the development of a Village Heritage Trail interpreting the built and natural Heritage of Balrothery in conjunction with local community groups.*

## **CE CH 4.34**

Update Sheet 4 to include Masterplan for Glebe Park.

# PART TWO

## Rural Fingal Chapter 5

### Submissions received relevant to this Chapter

D00022, D00052, D00071, D00186, D00171, D00191, D00229, D00239, D00272, D00282, D00321, D00330, D00350, D00369, D00380, D00398, D00413, D00421, D00444, D00449, D00459, D00496, D00498, D00513, D00546, D00535, D00537, D00551, D00578, D00596, D00598, D00601, D00615, D00621, D00623, D00628, D00641, D00659, D00677, D00696, D00707, D00709, D00721, D00728, D00731, D00742, D00764, D00767, D00769, D00770, D00771, D00772, D00773, D00774, D00775, D00776, D00786, D00787, D00788, D00789, D00790, D00791, D00794, D00795, D00796, D00797, D00798, D00799, D00800, D00801, D00804, D00805, D00809, D00810, D00811, D00812, D00813, D00815, D00816, D00817, D00818, D00819, D00820, D00825, D00826, D00829, D00831, D00832, D00833, D00835, D00837, D00838, D00839, D00841, D00843, D00845, D00846, D00851, D00852, D00857, D00860, D00861, D00862, D00863, D00864, D00865, D00874, D00882, D00883, D00884, D00885, D00886, D00887, D00890, D00895, D00897, D00900, D00908, D00909, D00910, D00911, D00912, D00913, D00914, D00915, D00916, D00918, D00919, D00920, D00921, D00922, D00926, D00927.

### Summary of Issues

#### Rural Settlement Strategy - Housing in the Countryside

A number of submissions require the following amendments to the Rural Settlement Strategy and specifically to housing in the countryside as follows:

- To recognise the difficulty in providing proof of part-time employment on a small family farm in the green belt land use zone where there is no monetary aspect to this work.
- To allow for the favourable treatment of established farming families from large landholdings with bloodline links to the land, an additional dwelling is sought within the RU, GB and HA rural land use zones across the County.
- Amend the distance requirement from the family home under Objective RF58 from 2 kms to 3 kms.
- Include provision for returning emigrants and Table RF03 be amended accordingly.
- Prioritise planning permission for a rural house for a relative with special needs where the 15 year residency requirement cannot be met.
- Include provision for persons who have a need to live adjacent to and provide care for an elderly parent. In this regard, amend Objective RF30 and Table RF03.
- Include provision for persons with close family ties to the rural area in the Inner and Outer Noise Zones for Dublin Airport.
- Omit recognition of housing need for established farming families within the Airport Inner Noise zone from Objective DA07 to minimise potential for conflict between sustainable airport growth and adjacent residential communities.
- Amend objective RF27 such that the conversion/extension of an existing dwelling since 19<sup>th</sup> October 1999 does not qualify in the consideration for a rural house.

# PART TWO

- Include a new objective to cater for existing rural dwellings displaced by airport infrastructure.
- Allow for an additional dwelling on the basis of close family ties in the RU – agriculture zoned lands within the County.
- Allow for dwellings on the basis of close family ties in the HA – high amenity zoned lands of the County. In this regard amend Objective RF36 and Table RF03.
- Allow a rural house within the high amenity zoned lands within the north Liffey Valley area of the County on the basis of ownership of lands greater than 2 has. for a period of 7 years. In this regard, amend Objective RF30 and Table RF02.

## Rural Villages

A number of submissions request the following in relation to Fingal's Rural Villages:

- Increase the quantum of RV zoned lands within Naul in lieu of backland residential lands in the village core as identified in the adopted Naul LAP and VDFP so as to maintain a distinct separation from the historic village core.
- Allocate an additional housing allocation to Rivermeade to create a critical mass to sustain a mix of uses, services and amenities.
- Rezone RV lands to the north of the River Ward in Rivermeade to RS.
- Replace the LAP requirement for Rivermeade with a Masterplan to facilitate a more immediate response to the overall development of the village resulting in the early delivery of housing and associated physical and social infrastructure.
- Review the Core Strategy housing allocation as it relates to Rowlestown and provide for an increase in the overall housing allocation, an additional quantum of RV zoned lands and a change in the overall zoning of the village from RV to a residential zoning. Omit the village of Rowlestown from 'Objective PM13' to allow for an increase in density in the village. In addition, increase the density of Development Area 6 identified in the adopted Rowlestown Local Area Plan to 11.26 units per hectare in the context of the Core Strategy review. These changes are required having regard to its Metropolitan status and the need to create a critical mass to sustain a mix of uses.
- Increase the quantum of RV zoned lands in the vicinity of the rural villages of Balscaddan, Ballyboughal, Oldtown, Coolquay and Kinsaley.
- No further development to occur in Kinsaley village due to infrastructural deficiencies particularly relating to roads and sewerage. Details required on the long-term plans for sewerage disposal for the village.
- Retain the character of the rural village of Kinsaley and future housing types to reflect the village setting. Details required regarding future house types.
- Protect existing development within Kinsaley. Concerns expressed regarding the likely negative impacts on privacy and amenity on existing residential development on Chapel Road arising from the future development of any 2-storey dwellings. Concerns also expressed regarding the future development of elevated lands attached to Kinsaley House and the likely negative impacts on adjoining property.

## Residential Accommodation for Seasonal Workers

The provision for seasonal worker accommodation in the Draft Plan is welcomed. However amendments are proposed to Objective RF49, i) increasing the maximum number of seasonal workers to 5 per hectare for each viable landholding to facilitate the intensive horticulture industry, (ii) increasing the maximum 10 bed space unit provision for seasonal worker

# PART TWO

---

accommodation to a maximum 25 bed space unit and iii) replacing the requirement for an en-suite, shower, toilet and basin for each bedroom with a requirement that each bedroom suite provides showers, toilets and basins.

## **Rural Economy and Enterprise**

The issues raised in relation to the rural economy and enterprise are dealt with under and responded to under the following headings.

### **Agriculture and Forestry**

The protection of the rural resource for its visual/scenic amenity value from adverse impacts of agriculture and forestry should be promoted in the Draft Plan. Farmers should be encouraged to see themselves as custodians of the countryside for current and future generations. A Land Use Strategy shall be promoted at National level. The potential of forestry for recreation and tourism shall be recognised and promoted in the Draft Plan. In this context, Coillte's 'Open Forest' policy shall be recognised. Encourage broadleaf forestry development in sensitive rural landscapes only and consider afforestation only in areas identified in a Landscape Character Assessment. Proposals for forestry development shall be in accordance with Forest Service Guidelines and Department of Housing, Planning Community and Local Government Guidelines relating to Forestry Development. Develop an Indicative Forestry Strategy for the County.

### **Land Reclamation and Aggregate Extraction**

Development relating to extraction shall not be permitted in high amenity areas, in the vicinity of recorded monuments and zones of archeological potential. In other areas of the County, such development shall be permitted only where it is carefully sited and designed while protecting the natural and built heritage of an area through mitigation and rehabilitation/restoration on a phased basis. Positive engagement is required with lobby groups, the National Parks and Wildlife Service and state bodies in the management and control of land reclamation development.

The policy and objectives relating to the extractive industries within the Draft Plan should not result in the sterilisation of aggregate resources by other land-uses nor prevent the secure, long term supply of construction aggregates and value added products such as construction materials. Furthermore, the potential role of recycled aggregates in reducing the demand for primary aggregates should not be over-emphasised or used as criteria to prevent the development of primary aggregate resources. While it is acknowledged that C&D waste can make an important contribution to sustainability by replacing primary aggregates, it is maintained that this source of building materials has not yet reached the scale of production in Ireland where it can significantly reduce the need for extraction of primary aggregates. It is further maintained that a serious obstacle to the use of recycled aggregates within this country arises from the absence of any end of use criteria for recycled aggregates at national level, which is currently under review by the EPA.

The importance of promoting the benefits of the extractive industry for the wider economy and society against the need to protect the environment from adverse impacts is recognised. It is considered that the inclusion of the words 'fully protected' in Objective RF84 is not balanced or appropriate. It could be construed to infer that that no changes will occur from the existing baseline.

### **Renewable Energy Projects**

The integration of both a Wind Energy and Green Infrastructure Strategy and the recognition that renewable energy offers sustainable alternatives to fossil fuels in the Draft Plan is welcomed. The preparation of a Solar Energy Strategy is proposed for the County to include provision for solar photovoltaic (PV) systems and this study to be undertaken on a regional basis

# PART TWO

---

across various Local Authorities to ensure consistency of approach. The requirements of the SEA and Habitats Directive shall be considered in the preparation of the Renewable Energy Strategy for the County.

## **Farm Diversification**

The Draft Plan to include a policy regarding the re-use/replacement of redundant farm buildings including details for potential uses of farm buildings located in green belt locations of the County. Business and residential uses are cited as examples for re-use.

## **Rural Tourism**

Fáilte Ireland welcomes the inclusion of a comprehensive range of tourism specific policies and objectives in the Draft Plan. References to tourism as an economic driver in the development of rural settlements are also welcomed and a number of specific text additions and objectives are proposed for inclusion in Chapter 5 Rural Fingal in this regard. Promote the development of rural tourism within the County including agri-tourism, farm-house accommodation and other rural related tourism uses without adverse impacts on the visual/scenic amenity of an area.

## **Recreational Pursuits Requiring Natural and Built Landscape Features**

The development of way marked walking trails should be promoted and developed within the low lying areas of the rural countryside where there is an abundance of biodiversity, notably hedgerows and associated flora and fauna. Promote and develop greenways and forest trails throughout the County. A Recreational Trails Plan to be prepared within two years of the adoption of this Development Plan. The economic value of walking trails to a rural area is noted particularly for the additional rural income that can be generated through activities such as walking festivals and value added food opportunities. In the context of walking trail development, the protection and retention of hedgerows requires a more proactive commitment and the value of hedgerows as green biodiversity corridors should also be promoted. Provision shall be made for the recreational use of agricultural land.

Protect existing rights of way for recreational purposes. Identify existing rights of ways in consultation with the general public and carry out a formal process of display and consultation. This shall include existing public rights of way which give access to seashores, rivers and other areas of natural recreation and landscape value. A subsequent variation of the Development Plan is required to include a list and map of all public rights of way. Way-marking to apply to public rights of way.

## **Chief Executive's Response:**

### **Rural Settlement Strategy - Housing in the Countryside**

Having regard to the Sustainable Rural Housing Guidelines for Planning Authorities 2005, rural Fingal can be classified as an area under 'Strong Urban Influence' due to its location in close proximity to Dublin City and major transport corridors. Managing the settlement of the rural part of the County poses a significant challenge. As a starting point, Fingal's Rural Settlement Strategy, asserts the "value" and benefits of the rural area of the County. The rural countryside is recognised as a valuable asset both environmentally and economically. It is critical that the asset is protected and enhanced. It is the Council's policy to promote a balance between reinforcing and strengthening sustainable rural communities whilst protecting the rural environment from over-development.

To protect and manage the rural countryside for future generations, the Rural Settlement Strategy [RSS] permits rural housing in limited and controlled circumstances. The RSS manages change in a way which attempts both to promote and protect the value of the rural resource in a

## PART TWO

---

sustainable manner and address rural generated housing needs of those functionally related to the area. The RSS fully complies with the provisions of the National Spatial Strategy, Regional Planning Guidelines and Sustainable Rural Housing Guidelines.

Fingal's Rural Settlement Strategy for housing in the open countryside serves to meet the settlement needs which are the result of a genuine rural-generated housing need. Rural-generated housing needs are considered to be the housing needs of people who have long standing existing and immediate family ties, or occupations which are functionally related to the rural areas of the County. The RSS also considers those with exceptional health circumstances in the context of the definition of rural generated housing need.

Fingal's RSS facilitates farming families and is considered just, fair and reasonable. In recognition that farming is no longer a full-time occupation for many farmers, the RSS includes provision for farmers whose income is supplemented by off-farm work. It is accepted that part-time farming can have a limited monetary aspect. All applications for rural housing are considered on a case by case basis and assessed on its own merits in terms of compliance with the RSS of the Development Plan through the Development Management process. Genuine rural generated housing need for farming families will be facilitated.

There is no planning rationale or reasonable justification for linking the size of the farm to the number of people who need to reside full time on the farm for operational reasons. This would give an unfair and unreasonable advantage to these large landowners by allowing more favourable treatment in terms of the number of rural houses. To allow this change would seriously undermine the accepted and established RSS which is considered fair and reasonable and would have serious impacts for the proper planning and sustainable development of rural Fingal.

The RSS is based on the requirement to locate new dwellings adjoining the family home within the rural countryside. The clustering of rural housing for family members serves to protect the rural countryside and its environmental features through the use of existing common entrances and roads infrastructure. Only in exceptional circumstances, where such clustering is clearly not possible, will a dwelling be permissible within 2 kms of the family home as set out in Objective RF58 of the Draft Plan. This policy requirement is considered reasonable and to allow a change to this policy would seriously undermine the established RSS and the requirement for clustering and as such would be contrary to proper planning and sustainable development.

The RSS facilitates those who have strong links to the particular rural area and who are an intrinsic part of the rural community. Such persons would normally have spent substantial periods of their lives living in the rural area as part of the established rural community including those originally from the rural area and wishing to return. The policy does not preclude a returning emigrant local to the rural area once compliant with the policy for New Housing for the Rural Community and the eligibility criteria as set out in Table RF03. The 15 year requirement can be at different intervals of an applicant's lifetime.

Where an applicant can demonstrate 'exceptional health circumstances', a rural house will be considered within the definition of rural generated housing need without having to comply with the 15 year residency requirement. To provide care for an elderly relative, the Draft Plan includes provision for a family flat linked directly to the family dwelling. Applications for family flats will be considered favourably subject to criteria set out in Objective DMS43.

The RSS facilitates persons with close family ties within the Outer Noise Zones for Dublin Airport within the definition of rural generated housing need. Within the area delineated by the inner noise zone for Dublin Airport, the development of new housing on the basis of close family ties

## PART TWO

---

will be actively resisted. This is to ensure the avoidance of conflict between airport operations and land uses and to ensure that new developments will not be subject to unacceptable levels of aviation generated noise and undue impact on residential amenity.

The caveats contained within the Draft Plan to mitigate against inappropriate residential development in the Inner Noise Zone whilst providing for the housing needs of the limited number of farming families in the area are considered appropriate.

The Draft Plan requires that that the maximum number of dwellings permitted under any of the rural land-use zonings will be less any additional house which has been granted planning permission since 19th October 1999. In the interests of clarity, the conversion/extension of an existing dwelling is not included in the assessment for a rural house.

The RSS recognises the situation of rural dwellers whose houses must be acquired, whether compulsorily or by agreement, to facilitate infrastructural improvements and works which are in the interest of the common good as set out in Objective RF51 of the Draft Plan. This objective will facilitate any dwellings displaced by infrastructural works relating to airport development.

Importantly, even with the rural housing policy limits, rural houses are dispersed in significant numbers across the rural part of the County. A significant area of rural land within the County has been integrated into sites for rural houses. The present dispersion of rural houses within the County, and the need to maintain and protect the rural countryside which is a finite resource combined with the likelihood that the rate of rural house development will revive with the economic “upturn”, indicate that there is a continued need for a strong controlled approach to rural housing.

It is important to recognise that each rural house has the potential to incrementally increase the number of new rural houses by virtue of the rural policy facilitating additional housing on the basis of close family ties within the RU-agricultural zoned lands across the County. The cumulative impact of each rural house would lead to inappropriate and unsustainable settlement patterns of development and serious detrimental impacts on the agricultural resource, giving rise to:

- Extensive land take of agricultural lands within the County (minimum 0.2 has. per house) resulting in the loss of farming land and farm production capacity. Rural Fingal has a ‘wide’ capability for agriculture and food production with a national reputation for its horticultural sector.
- Undermine the viability of normal farming activities.
- Erosion of the rural character and visual quality of the countryside and the potential loss of the rural landscape as a resource for tourism.
- Loss of biodiversity.
- Threats to surface water and ground water quality from private wastewater treatment systems, having regard in particular to the poor percolation characteristics of much of Fingal's soil,
- Unsustainable car dependent commuting patterns, and
- High costs of public services in comparison to more consolidated development patterns.

The Draft Plan is explicit in the protection and promotion of the value of the rural area of Fingal and the Council is firmly committed to the continued protection of this valuable resource that cannot be inconsequentially exhausted.

# PART TWO

---

Areas which are particularly sensitive to ongoing incremental housing growth, i.e. the High Amenity zoned areas, are limited to more essential needs, with the broader rural community who wish to remain in the rural area qualifying for housing in villages and rural clusters.

The areas within the County that are covered by the HA- High Amenity zoning objective include the Garristown uplands, Naul Hills, the Liffey Valley and the Coastal Corridor. These high amenity areas and particularly the Coastal Corridor contain the County's most important EU, National and local resources in terms of natural environment, landscape and heritage. The sensitive development and conservation of these environment resources is critical to their long term sustainability. Notably, the areas of greatest development pressure within the County coincides closely with these areas of high amenity value. In this regard, a careful balance has to be achieved between new development and the on-going need to protect its high landscape value. The Draft Plan affords a high level of landscape value and protection to these high amenity areas. These landscape areas meet one or more of the following criteria:

- Contain scenic landscape of high quality
- Afford expansive or interesting views of surrounding areas
- Are components in important views and prospects
- Are unique or special within the County
- Are important elements in defining the coastal character of the County
- Act as a backdrop to important coastal views
- Contain important groups of trees or woodland
- Are elevated or ridge sites on which development would be obtrusive
- Provide public access to interesting attractive landscapes or to semi-natural areas

The High Amenity zoning objective seeks to, 'Protect and enhance high amenity areas.' The vision associated with the objective seeks to, 'Protect these highly sensitive and scenic locations from inappropriate development and reinforce their character, distinctiveness and sense of place. In recognition of the amenity potential of these areas opportunities to increase public access will be explored.' The primary objective of the Council over the past ten years has been to limit housing development in particular within the rural areas with a HA-High Amenity zoning objective in order to promote more sustainable settlement and protect the most sensitive parts of the County. In the high amenity areas, only housing need related to farming and exceptional health circumstances [1 (+1 for exceptional health circumstances)] is to be facilitated.

The density of housing in high amenity areas relative to other rural areas within the County indicates the success of the policy objective, and that the objective has been relatively successful in limiting the relative land take of housing development within these High Amenity areas. The Council will continue to concentrate efforts to protect high amenity areas. Additional housing based on close family ties would be a significant and potentially detrimental force for change for the County's high amenity landscapes which are important for inherent ecological, biodiversity, historic and cultural interest and which are highly sensitive in visual terms. The cumulative impacts from an incremental increase in the number of new rural houses by virtue of the rural policy facilitating those with close family ties would gradually erode the distinctive character and identity of all high amenity areas, fragmenting and destroying this valued landscape and valuable habitat features.

To favour those located in the high amenity zoned lands and specifically within the north Liffey Valley area of the County for a rural house on the basis of ownership of lands greater than 2 has. for a minimum period of 7 years would give an unfair and unreasonable advantage to such landowners. To allow this change would seriously undermine the accepted and established RSS which is considered fair and reasonable, would seriously contravene the zoning objective and vision for high amenity lands of which it is Council policy to protect and would have serious

# PART TWO

impacts for the proper planning and sustainable development of rural Fingal and its valued sensitive landscapes. The Council is fully committed to the continued protection and enhancement of existing high amenity areas within the County.

## Rural Villages

The Rural Village – ‘RV’ zoning objective seeks to,

*‘Protect and promote the character of the Rural Village and promote a vibrant community in accordance with an approved local area plan and the availability of physical and community infrastructure’.*

Fingal’s Rural villages are important rural assets providing a viable alternative housing experience to the open countryside with the advantages of a rural setting. A key aim of the Draft Plan is the need to control expansion to prevent excessive development so as to protect the unique identity of these villages. These villages will be allowed to grow to support sustainable development in the context of the Council’s Core and Settlement Strategies. Both these strategies aim to physically consolidate the majority of future growth in the County in the Metropolitan area in accordance with the policy approach of the Regional Planning Guidelines. Village Local Area Plans [LAP’s] and associated Village Development Framework Plans [VDFP] provides a planning framework for their future development.

The villages of Naul, Balscaddan, Ballyboughal and Oldtown are located within the hinterland of Greater Dublin Area as defined in the Regional Planning Guidelines for the Greater Dublin Area. The RPG’s recommend the future development of these villages should be as key local centres for services and local enterprise/development, without resulting in growth beyond local need or creating unsustainable commuting patterns. Rowlestown, Rivermeade, Coolquay and Kinsaley are commuter villages located in the Metropolitan Area within close proximity to the County town of Swords and the urban settlements of Malahide and Portmarnock in the case of Kinsaley. Given their status as commuter villages, the level of growth must be carefully managed. The RPG’s recommend that the future growth of these villages should be curtailed or safeguarded so that they do not act as a catalyst to facilitate continuing expansion of unsustainable growth patterns.

The allocation of housing unit numbers for the entire County area has been thoroughly analysed and addressed in the context of the Core Strategy of the Draft Plan 2017-2023 based on the directions contained in the RPG’s. The allocation of new population growth and housing numbers within Naul, Balscaddan, Ballyboughal, Oldtown, Rowlestown, Rivermeade Kinsaley and Coolquay supports the settlement hierarchy contained within the settlement strategy as defined within the Draft Plan.

The total housing unit allocation in the Draft Plan for Fingal’s Small Towns and Villages within the hinterland area comprising Balrothery, Loughshinney, Ballyboghil, Balscadden, Garristown, Oldtown and Naul is 913 housing units. The total unit allocation for Small Towns and Villages within the Metropolitan area comprising Portrane, Coolquay, Kinsaley, Rivermeade and Rowlestown is 877 housing units.

The approved allocation for Naul Village is approx. 66 housing units (in addition to a small allowance for additional single infilling along the Main Street area), Ballyboughal 190 units, Oldtown 272 units, Rowlestown 150 units and Rivermeade 139 units. These allocations have been identified in the ‘Village Design Framework’ development areas as defined in the adopted Naul LAP May 2011- extended to April 2021, Ballyboughal LAP June 2013, Oldtown LAP June 2012, Rowlestown LAP May 2013 and Rivermeade LAP June 2013. The housing allocation for Balscaddan, Kinsaley and Coolquay will be determined in the context of the remaining Core Strategy allocation for the Metropolitan and Hinterland villages. The LAP’s for these villages will propose how and where these units will be located.

## PART TWO

---

This allocation represents a fair and equitable allocation based on:

- The overall allocation for the hinterland and metropolitan areas small towns and villages.
- The evidence-based approach adopted in the Core Strategy, where Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period.
- The capacity of the rural villages to accommodate growth without compromising their essential character, and
- The strong need to avoid any further suburbanisation of the Fingal rural villages.

All the adopted Local Area Plans and companion Village Development Framework Plans for Fingal's Rural Villages have had regard to the Department of Housing, Planning Community and Local Government's: *'Sustainable Residential Development in Urban Areas - Guidelines for Planning Authorities'*, 2009 regarding the development of small towns and villages. A key objective of these guidelines requires that new development should contribute to maintaining compact towns and villages. "Leap-frogging" of development at some distance from the existing built-up area should be avoided. Overall expansion should proceed on the basis of a number of well integrated sites within and around the urban centre rather than focusing on rapid growth driven by one very large site. Furthermore, these guidelines state that the scale of new development should be in proportion to existing development and the design, layout and character of new development should successfully relate to the local context. With respect to Objective PM 13 which seeks to implement the existing Village Design Frameworks prepared as part of the Local Area Plans for Ballyboughil, Garristown, Naul, Oldtown, Rivermeade and Rowlestown, it should be noted that the Village Design Frameworks are prepared in line with relevant Local Area Plans for particular areas and act as a design support tool for their associated Local Area Plan, within the structure of the Fingal County Development Plan and in this regard it not considered appropriate to omit Rowlestown from Objective PM 13. Densities are currently set out in existing Local Area Plans and any review to increase densities to facilitate the provision of associated infrastructure is most appropriately dealt with through such a Local Area Plan review process.

A key objective of the Local Area Plan's for Fingal's Rural Villages is the consolidation and strengthening of the existing village core. Considerable development opportunity exists within these villages and their centres where the majority of development areas identified in the LAP's and VDFP's remain undeveloped to date. It is noted that the quantum of RV zoned lands in Kinsaley village has almost doubled since the adoption of the 2005 Fingal Development Plan from 16.49 has. to the proposed 29.10 has. in the Draft Plan. A large majority of these lands remain undeveloped to date. The priority focus is for the development of key remaining development sites within villages which is consistent with the Department of Housing, Planning Community and Local Government's guidelines relating to village development.

These considerations have formed the core basis of the approach of the local area planning of the Fingal rural villages both within the Hinterland and Metropolitan areas. There is no evidence based reason or planning rationale for increases in the quantum of RV zoned lands and housing allocation for these villages. Such proposals would lead to the suburbanisation of Fingal's rural villages and would be in clear and significant contravention of the adopted Local Area Plans, the Core Strategy of the Draft Plan 2017-2023, the Greater Dublin Area Regional Planning Guidelines 2010 - 2022 and as such would be contrary to proper planning and sustainable development.

The Council will only consider changes to the RV zoning where it can be clearly shown that this contributes significantly to the development objectives of the village as set out in Section 5.1 of the Draft Plan. [Sheet 3 and 9 refers to such locations where considered appropriate.] It is noted

## PART TWO

---

that specific zoning requests for extensions to the RV zoning objective at specified locations within the County are discussed in detail in Sheets 3, 4, 9, 12.

The overall approach taken to the development of the Fingal's villages:

- Assimilates the key messages of the Guidelines as they relate to villages,
- Detailed appraisals relating to the natural and built heritage and the strong need to protect existing character and local identity and avoid any further suburbanisation of these rural villages.
- Appropriate absorption capacity,
- A high level of detailed design promoting best conservation practice with innovative architectural solutions for the overall development of the village House types and layouts to reflect the village setting and consideration of existing residential development, and
- Reflects the feedback both from submissions and face to face meetings at the public consultation sessions with local people.

The Kinsaley Local Area Plan process will involve this same level of analysis. The plan preparation will involve community engagement and an invitation for submissions through the statutory public consultation process from relevant stakeholders, interested parties and residents regarding any aspects relating to the future development of the village. Specific concerns relating to impacts on individual properties from proposed development can be also be made within the context of the Development Management process. The Kinsaley LAP will set out the future planning framework for the overall development of the village including details on house types.

As stated earlier in this report, the purpose of the RV zoning objective is to *'Protect and promote the character of the Rural Village and promote a vibrant community in accordance with an approved local area plan and the availability of physical and community infrastructure'*.

The RV zoning provides for the integrated and long-term planning and sustainable development of the village. Fingal County Council has been responsibly protecting its rural villages from overdevelopment, protecting their character and individual identity through the Local Area Plan and Village Development Framework Plan process. LAPs and accompanying Village Development Framework Plans have been prepared and adopted for Ballyboghil, Garristown, Naul, Oldtown, Rivermeade and Rowlestown. LAP's will be prepared for the remaining villages.

The Local Area Plan process is considered the most appropriate vehicle to provide a coherent sustainable planning framework for the future development of Fingal's villages. LAPs provide the frameworks to secure sustainable development that balances physical, social, economic and environmental considerations at the local level while minimising the potential adverse effects of development on the environment. The LAP process involves community consultation and reflects the feedback from both submissions and face to face meetings at local consultation sessions with the local community. A good LAP balances the needs and aspirations of the community with the requirements of the Planning Authority and the expectations of relevant stakeholders. LAP's promote physical and social integration and sustainable self-sufficient communities.

The Rowlestown LAP was adopted in May 2013 and sets out the optimal long-term development strategy for the village in tandem with the timely delivery of physical, social and recreational infrastructure. This is a village plan where there is significant emphasis on protecting and enhancing the outstanding landscape context of the remarkable late 18<sup>th</sup> century demesne rural landscape, promoting Fingal's Green Infrastructure Strategy through protecting and incorporating the hedgerows into development sites, protecting the Broadmeadow River environment, whilst promoting its amenity, ecological and recreational potential.

## PART TWO

---

There is significant opportunity as part of the development of the LAP lands to provide for improved physical and social infrastructure and recreational facilities for the benefit of the expanding community in the village. Currently there is no pub, restaurant/café, post office or recreational amenities within the village. In this regard, the LAP includes provisions for the restoration and regeneration of the Mill complex for pub/restaurant use, the development of a riverside park along the ecological corridor of the Broadmeadow River, a central village green and pocket parks, all connected through a network of permeable pedestrian routes. Enterprise development is proposed within Development Area 10 to the west of the village. The LAP recognises the potential to make tourism a key economic function of this picturesque village.

The imposition of a residential zoning across the entire rural village of Rowlestown would severely limit the development potential identified in the adopted LAP for the village and prevent many of the envisaged development opportunities and uses. For example, an RS zoning prevents the development of a public house, a restaurant and café use is only open for consideration within the RS zoning objective whereas this use is permitted in principle within the RV zoning objective. These are all uses proposed in the context of the regeneration of the Mill Complex within the adopted LAP. An Enterprise Centre is not permitted in an RS zoning. An Enterprise Centre is proposed within the village to provide for appropriate employment opportunities within the village. The RV zoning objective allows for a range of uses that will help transform the village into a vibrant sustainable community.

Coupled with these limitations, a residential zoning would result in the complete suburbanisation of this village, radically transforming the village from a definable rural settlement into a suburban satellite of Swords with an irretrievable loss of the unique character and local identity of the village. The opportunity to develop the social, enterprise and recreational infrastructure and amenities, on an incremental and phased basis through the LAP framework would also be lost. The village would essentially become a large scale housing development, seriously undermining the overall LAP vision and objectives for the village to provide for the phased delivery of the required infrastructure, particularly local services including shops, a public house, restaurant/café within the regenerated Mill Complex and recreational facilities such as the riverside park and central village green. The proposal to replace the RV zoning objective with a residential zoning would be contrary to the objectives of the Draft Plan to protect and promote the development of Fingal's rural villages, the aims and objectives of the adopted Rowlestown LAP and the proper planning and sustainable development of the village.

Rivermeade is a rural village, albeit located within the Metropolitan Area, with very limited road connections, public transport services and few other services and amenities. Despite its unique settlement history [it was essentially developed as a housing estate], poor connectivity and deficiencies in services and amenities, Rivermeade with its well-established community, its proximity to Swords and the Airport [which are key employment centres] and notable landscape quality [Rivermeade is located along the River Ward] has considerable potential to develop into a vibrant sustainable village with a degree of self-sufficiency.

The adopted Rivermeade LAP 2013 sets out the optimal long-term development strategy for the village including the RV zoned lands north of the River Ward, in tandem with the timely delivery of much needed physical infrastructure addressing existing deficits particularly road improvements, recreational facilities and local services including shops.

## PART TWO

---

The overall LAP vision for Rivermeade is to transform the area into a sustainable re-generated and fully integrated village, providing for residential development in tandem with the phased delivery of much needed infrastructure, particularly roads, recreational facilities and local services. There is significant opportunity as part of the development of the LAP lands to provide for much improved physical and social infrastructure which will be of great benefit to both the existing and future residents in Rivermeade village and which will greatly improve future connections [vehicular, pedestrian and cycle] between Rivermeade village and Swords.

In this regard the LAP includes the following provisions:

- Development Area 1 identified in the adopted LAP and VDFP is the proposed village centre a key development site located opposite the primary school and adjoining the entrance to Rivermeade on lands owned by Fingal County Council and currently used as a football pitch. The development of this area for mixed uses [including retail, commercial, employment, community and residential uses] is considered a priority by Fingal County Council given the need to develop supporting services for the expanding village and its rural hinterland.
- Development Area 4 identified in the adopted LAP and VDFP provides for a Recreational Hub within the eastern part of the LAP lands adjoining the River Ward and reservoir. Provision shall be made for the development of active recreational facilities within this area including a new floodlit soccer football pitch and a floodlit mini all weather pitch. In addition provision will be made for tennis and / or basketball courts, if required, following public consultation.
- Development Area 6 where the majority of lands within this area are owned by the Council provides for improved Recreational amenities.
- Development Area 8 immediately to the north of the River Ward provides for a Sustainable Living Centre integrating with the reservoir which is proposed to be restored for recreational use.
- The LAP provides for direct and attractive pedestrian and cycle linkages along the River Ward and throughout the village. The road upgrade proposals including the shared footpath and cycle facility along both the Rivermeade Link Road and along the upgraded Killeek Lane will be a key element in connecting Rivermeade to the very attractive Ward River Valley Park 'green route' between Swords and Rivermeade which will in time greatly improve pedestrian and cycling connections between Rivermeade and Swords.

The provisions in the adopted LAP to provide for significantly improved recreational facilities and local services were overwhelmingly well received by the community in terms of the long term sustainability of the village. All of these facilities and particularly the new village centre, recreational hub and the Sustainable Living Centre will be of great benefit to existing and future residents in Rivermeade and its rural hinterland as well as being an 'attractor' bringing in visitors particularly from Swords to the area. The LAP proposes a new internal link road and bridge crossing to facilitate access to all of the development lands north of the River Ward. This road will ensure the proper integration of existing and future residential development located to the north and south of the River Ward.

Rezoning the lands north of the River Ward to 'RS' would likely result in the development of two separate housing estates one to the north and the existing to the south with little or no proper

## PART TWO

integration which would totally undermine the overall LAP vision and objectives for the village to provide for residential development in tandem with the phased delivery of the much needed and required physical and social infrastructure, particularly roads improvements, recreational facilities and local services for the benefit to existing and future residents in Rivermeade.

It is accepted that demands for housing are high and are rising in Fingal. In response to these demands, the Council proposes to immediately commence the review of the Rivermeade LAP by advertising the first call for submissions. As part of this review the Council will undertake to reassess the residential densities in the existing LAP and to consider the appropriateness of higher densities which will help in the delivery of necessary physical and social infrastructure, particularly road improvements, expanded recreational facilities and local services for the benefit of existing and future residents in Rivermeade and this will address the meaningful concerns of the relevant submissions.

In the context of the Development Plan which is a strategic document, to specify an increased density on a village or within specific sites, without the level of analysis referred to is not in accordance with proper planning and sustainable development of the area. Rather, it is the Local Area Plan that is the most appropriate planning vehicle in which to address any future increase in potential densities.

Local Area Plans include a phased approach to the build out of the villages, in tandem with the necessary infrastructure. The Kinsaley LAP will include this phasing approach to ensure that new development does not proceed without the necessary infrastructure. Currently, Irish Water has appointed Engineering Consultants under the Local Network Reinforcement Project to examine solutions for the current deficiencies within the sewerage network in the Kinsealy area. A Report is expected by the end of July 2016 on preferred options and a timetable of works to be determined accordingly. The Draft Plan includes an objective for the upgrade of the R107 Malahide Road Realignment to the west of Kinsaley to facilitate existing and new development in the area. A Traffic Impact Assessment [TIA] will be done as part of the future LAP for Kinsaley village. Irish Water's study findings and the outcome of the TIA will form the basis for the infrastructural and phasing sections of the Kinsaley Local Area Plan.

### **Residential Accommodation for Seasonal Workers**

Fingal County Council recognises the significant contribution that the large horticultural and agriculture growing businesses within Fingal make to the local, regional and national economy. These businesses have invested heavily in horticulture and agricultural development to date resulting in significant job creation and import substitution. The Economic Strategy of the Draft Plan recognises the value of the horticultural and agricultural sectors to Fingal and supports and facilitates the development of environmentally sustainable horticultural/agricultural practices and value added opportunities.

The need to provide for an acceptable standard of on- site accommodation for seasonal workers on large agricultural/ horticultural holdings, given the current housing shortages is acknowledged in the Draft Pan. This is the first time that Fingal has proposed a policy in the FDP to accommodate seasonal workers on farms. The level provided for in the Draft Plan is for a maximum of 100 workers on any landholding [within areas zoned RU, GB and FP] which is over 50 hectares in area.

In recognition of the significant contribution that the large growers make to the overall economy and the need to accommodate seasonal workers to facilitate intensive horticultural/agricultural activities, an increase from 100 to 200 seasonal workers per viable landholding is considered reasonable. To accommodate this additional increase, the form of new purpose built accommodation shall also be increased from a maximum 10 bed space unit to a maximum 25 bed space unit. The provision of new on-site residential accommodation for seasonal farm

# PART TWO

---

workers shall be designed in an innovative, cohesive and purpose built manner resulting in a high standard of quality accommodation and minimising reduced visual impacts on the surrounding rural area. In this regard, new purpose built on-site accommodation shall be single storey only.

## **Agriculture and Forestry**

The “value” and benefits of the rural area of the County is to the forefront of Chapter 5 and is recognised as a valuable asset both environmentally and economically. It is critical that the asset is protected and enhanced. The Statement of Policy relating to Rural Fingal reinforces the protection of the natural and built landscape of the rural Fingal and ensures that new development integrates and compliments the character of the area without undue negative impacts on the scenic and visual amenities of the area.

The Council promotes and encourages farming practices and production methods that have regard to conservation and landscape protection in the Draft Plan. Specifically, objective RF73 of the Draft Plan encourages the development of environmentally sustainable agricultural practices to ensure that development does not impinge on the visual amenity of the countryside. The citizens of Fingal, and most immediately the rural residents including farmers, are responsible for asserting and protecting this valuable rural resource. The forth coming National Planning Framework will inform any future Land Use Strategy at National Level.

The needs of agriculture and forestry are addressed in a comprehensive and consistent manner within the Draft Plan. The importance of these sectors to the local and wider economy is recognised and the sustainable development of these sectors is promoted in the Draft Plan. Objective RF83 supports and facilitates sustainable forestry and the protection of the landscape from significant adverse impacts of forestry development. While the recreational and tourism potential of forestry is accepted and recognised in the Draft Plan, Fingal has a limited forestry resource and all within private ownership. There are no state owned Coillte forests within the County. Therefore the role of forestry in fostering rural tourism and recreation in the County is currently limited. Notwithstanding, the Council recognises and supports the value of forestry for recreational and amenity activities in the Draft Plan. The Council will support the Forest Service of the Department of Agriculture, Food and Marine responsible for afforestation or felling proposals within the County through engagement within the application process where relevant. The Landscape Character Assessment as set out in Section 9.3 within Chapter 9 Natural Heritage of the Draft Plan will guide such development proposals in the County.

The Draft Plan shall include provision for the preparation of an Indicative Forest Strategy (IFS) with an emphasis on the promotion of broadleaf forestry where resources allow. This strategy will guide the future location and character of the forest industry in the County in line with national policy guidance and in consultation with the Forestry Service and other relevant stakeholders and interested parties. The strategy will also identify the potential that future afforestation can make towards the establishment of high quality forests serving a variety of purposes including timber production, rural development and off farm incomes, tourism, recreation and the enhancement of the environment in the County. The IFS will be guided by the Landscape Character Assessment [LCA] of the County as set out in Chapter 9 Natural Heritage of the Draft Plan.

## **Land Reclamation and Aggregate Extraction**

The importance of the extractive industries to the local and national economy is acknowledged in the Draft Plan. To further support this industry, the protection of the County’s natural aggregate resources from inappropriate land-uses that would interfere with the efficient

# PART TWO

---

development of such resources shall be included in the Draft Plan. It is accepted that extraction brings about landscape change but must carefully balance the need to avoid significant adverse effects on the environment and amenity through detailed environmental assessment, mitigation and appropriate provision for restoration of the landscape. Environmental protection from extraction and land reclamation including the protection of sensitive landscapes is paramount in the Draft Plan through Objectives RF86-RF90. Proposals for extraction will be carefully considered through the Development Management Process and the criteria set out in Chapter 12 Development Management – Section 12.13 and specifically Objective DM169. This objective includes detailed guidance to mitigate against the likely effects of extractive development on the environment, including appropriate restoration requirements. Engagement with the various interest groups and prescribed bodies including the National Parks and Wildlife Service will occur during the Development Management process regarding extraction and land reclamation proposals.

The Draft Plan will continue to promote and encourage the potential use of alternative sources of sustainable material such as construction and demolition waste [C&D] to reduce the need for excessive extraction. However, in view of the importance of the extractive industry to the local and wider economy, the absence of current C&D waste performance data in the context of extraction reduction as well as the absence of end of use criteria for recycled aggregates at national level, the policy restricting extraction only in light of the availability of recycled C&D waste as set out in the Draft is considered to be overly restrictive.

## **Renewable Energy Projects**

The Council recognises that renewable energy including solar energy can make a significant contribution to reaching Ireland's renewable energy targets to 2020 and beyond. The Draft Plan promotes and facilitates new and innovative renewable energy technologies including Solar PV systems and recognises that solar farms have the potential to be considered on suitable sites within the County as promoted in Objective EN14.

Fingal's overall approach to the preparation of a Climate Change Mitigation and Adaptation Strategy which will also address Renewable Energy in conjunction with the other Dublin Local Authorities is discussed in detail in Chapter 7 of this CE report. [CE Report Chapter 7 and specifically Climate Change Mitigation and Adaptation Strategy and Renewable Energy refers] The requirements of the SEA and Habitats Directive will be considered in the preparation of this strategy.

## **Farm Diversification**

The Draft Plan is explicit in its support for farm diversification at Section 5.3 and specifically at Objective RF96 which seeks to, 'Promote the sensitive re-use and adaptation of existing farm buildings for farm diversification. Where a new building is necessary, it shall be sited, where practical, in or adjacent to the existing group of farm buildings and shall relate to existing buildings and the surrounding countryside in terms of design, siting, and materials.'

A number of alternative schemes have been identified by Teagasc and included in the Draft Plan for the purposes of farm diversification including production of dairy products (such as cheese and yogurt), forestry, equine enterprises, adventure tourism, and renewable technologies. Redundant farm buildings can be reused/adapted within this context. Any proposals for reuse and adaptation of farm buildings will be considered through the Development Management process. Proposals will be considered on a case by case basis and assessed on its own merits in the context of the overall zoning objective and vision relating to the lands and the policy and objectives relating to farm diversification as set out in the Draft Plan. Any proposals for housing

# PART TWO

---

in the countryside will be assessed in the context of the criteria set out in the Rural Settlement Strategy.

## **Rural Tourism**

The Draft Plan is explicit in its promotion and support for rural tourism. It is recognised that tourism is an important indigenous sector of the Fingal local economy generating income and employment. The Council will seek to promote the economic and social opportunity which tourism within the rural area represents to both Fingal and the wider area. Objective RF103 promotes sustainable tourism initiatives which develop the tourist potential of the rural area while recognising and enhancing the quality and values of the rural area. Objective 104 supports recreational pursuits which promote the use of natural landscape features which does not cause undue damage to the landscape and requires Screening for Appropriate Assessment for recreational proposals within or adjacent to European sites. Objective RF116 promotes guest house accommodation within the rural area within the context of existing dwellings. The proposals by Fáilte Ireland are considered to be consistent with the proper planning and sustainable development of the County and further strengthens the promotion of rural tourism in the Draft Plan.

## **Recreational Pursuits Requiring Natural and Built Landscape Features**

The promotion of the natural environment for recreational pursuits is recognised and supported specifically within Objective RF104. Objective ED64 of the Draft Plan promotes and facilitates a co-ordinated network of walking trails in the County through the development of a Recreational Trails Plan within the lifetime of this Draft Plan. Where resources allow, this plan could be prepared earlier within the Development Plan period 2017-2023. This trails plan will include provision for a variety of walking trails including strategic greenways and localised trails within low lying agricultural areas. A comprehensive and co-ordinated approach to way-marking and signage will also be included in this plan and will examine and plan for signposting/way-marking on existing rights of way.

Objectives RF107–RF111 deals comprehensively with public rights of way which supports and facilitates their further expansion throughout the County and resisting development which would prejudice public access to rights of way. Existing rights of way will be examined and integrated into new development through the Development Management process.

Objective RF107 requires the mapping and documenting of existing right of ways within two years of the adoption of this Development Plan in consultation with landowners and the public for inclusion in the Development Plan by way of variation. This will include existing rights of way to seashores, riverbanks and other areas of natural recreation and landscape value.

An audit of existing walking trails including public rights of way throughout the County will form part of the planning and development of a recreational trail network. The promotion of key features/attractions of an area will also be examined and planned for within the context of a localised or strategic walking route. The development of new waking trails shall have regard to biodiversity features such as hedgerows. GI107 seeks to integrate the provision of green infrastructure with infrastructure provision and replacement, including walking and cycling routes, as appropriate, while protecting biodiversity and other landscape resources.

The development of the Recreational Trails Network Plan will include a public consultation process where relevant stakeholders and interested parties will have an opportunity to make submissions. Any parties interested in forestry trail development in the County will have an opportunity to make submissions in this regard and will be considered in the context of the Recreational Trails Plan.

# PART TWO

---

The hedgerow network throughout Fingal is recognised within the Draft Plan as a valuable natural resource for amenity, biodiversity and contribution to landscape character and includes a number of objectives for their protection and management. Objectives RF56 and NH25 ensures that new development proposals shall have regard to the protection of existing trees, hedgerows, townland boundaries and watercourses which are of amenity, historic or biodiversity value and ensure that proper provision is made for their protection and management.

Linear landscape features such as hedgerows are recognised for their value as ecological corridors and the protection of their ecological function and integrity is explicit throughout the Draft Plan. The hedgerow resource forms part of the Green Infrastructure [GI] network of the County which is increasingly recognised as a vital component in building resilient communities capable of adapting to the consequences of climate change. Objective GI02 seeks to develop the green infrastructure network to ensure the conservation and enhancement of biodiversity.

The Draft Plan further develops the concept of Green Infrastructure from the current FDP 2011-2017 and Objective GI09 seeks the development and implementation of a Green Infrastructure Strategy for the County in partnership with key stakeholders and the public. This GI Strategy will comprehensively address all aspects of GI including the County's biodiversity. The Council is firmly committed to the protection, enhancement and management of the County's biodiversity which includes the hedgerow resource through its policy and objectives as set out in the current FDP 2011-2017 and the Draft Plan 2017-2023. The development and implementation of a Green Infrastructure Strategy for the County will reinforce the protection and management of the valuable biodiversity resource of the County.

## **Recommendation:**

### **CE CH 5.1**

#### **Rural Villages**

Amend Objective RF01 as follows:

Review the Rivermeade Local Area Plan before the end of 2017. *This plan will reassess the potential for higher densities which will help in the delivery of necessary physical and social infrastructure, particularly road improvements, expanded recreational facilities and local services for the benefit of existing and future residents in Rivermeade.*

### **CE CH 5.2**

#### **Residential Accommodation for Seasonal Workers**

Amend the text relating to Section 5.1 and specifically Residential Accommodation for Seasonal Workers to include the following :

The provision of new on-site residential accommodation for seasonal farm workers shall be designed in '*an innovative*,' cohesive and purpose built manner resulting in a high standard of quality accommodation and minimising reduced visual impacts on the surrounding rural area. '*In this regard, new purpose built on-site accommodation shall be single storey only.*'

Amend Objective RF49 as follows:

- New on-site residential accommodation for seasonal farm workers shall be designed in *an 'innovative,'* cohesive and purpose built manner resulting in a high standard of quality accommodation whilst minimising visual impacts on the surrounding rural area. '*In this regard, new purpose built on-site accommodation shall be single storey only.*'
- A viable landholding can facilitate up to a maximum of 100 seasonal workers.

Replace with the following:

# PART TWO

- A viable landholding can facilitate up to a maximum of 200 seasonal workers.
- New purpose built accommodation shall be provided in the form of a maximum 10-bed space unit.

Replace with the following:

- New purpose built accommodation shall be provided in the form of a maximum 25 bed space unit.
- ~~Each bedroom shall have an ensuite shower, toilet and basin.~~

Replace with:

- *'1 no. shower, toilet and basin facility shall be provided per 4 bed spaces'*
- Appropriate indoor and outdoor communal and recreational facilities at a combined level of 5-7 sq.m per bedspace. *'These facilities shall be provided prior to occupation.'*
- Communal facilities and services shall be provided for and include laundry and refuse facilities. *'These facilities shall be provided prior to occupation.'*

## CE CH 5.3

### Agriculture and Forestry

Include the following after the 2<sup>nd</sup> Para. At the end of Section 5.3 Forestry:

*The Council shall prepare an Indicative Forest Strategy (IFS) with an emphasis on the promotion of broadleaf forestry where resources allow. This strategy will guide the future location and character of the forest industry in the County in line with national policy guidance and in consultation with the Forest Service of the Department of Agriculture, Food and Marine and other relevant stakeholders and interested parties. The strategy will also identify the potential that future afforestation can make towards the establishment of high quality forests serving a variety of purposes including timber production, rural development and off farm incomes, tourism, recreation and the enhancement of the environment in the County.'*

## CE CH 5.4

Include the following new objectives at the end of Section 5.3 Forestry:

Objective RFxx *'Support the Forest Service of the Department of Agriculture, Food and Marine in implementing sustainable forest development in line with National policy guidance.'*

## CE CH 5.5

Objective RFxx *'Support the protection and enhancement of existing native woodlands and where appropriate, the conversion of coniferous forest to native woodlands with a focus on opportunities for habitat linkage and wider eco-services.'*

## CE CH 5.6

Objective RFxx *'Encourage access to forestry for walking routes, mountain bike trails and other non-noise generating recreational activities.'*

## CE CH 5.7

Objective RFxx *'Prepare an Indicative Forest Strategy (IFS) with an emphasis on the promotion of broadleaf forestry where resources allow, in line with relevant National policy to guide the future location and character of the forest industry in the County in consultation with the Forest Service of the Department of Agriculture, Food and Marine and other relevant stakeholders and interested parties.'*

# PART TWO

## CE CH 5.8

### Land Reclamation and Aggregate Extraction

Insert the following after the end of the Para. 1 within Section 5.3 'Land Reclamation and Aggregate Extraction:

*The Council will seek to ensure that significant aggregate resources in the County are appropriately protected and in this regard will restrict the siting of incompatible developments that would interfere with the efficient development of such resources.'*

## CE CH 5.9

Insert the following after the end of the Para. 1 within Section 5.3 'Land Reclamation and Aggregate Extraction:

*The potential use of alternative sources of sustainable material such as construction and demolition waste [C&D] is encouraged and should be employed where possible to reduce the need for excessive extraction.'*

## CE CH 5.10

Omit the following para from Section 5.3 'Land Reclamation and Aggregate Extraction:

~~'In light of the seriously detrimental impacts of extractive industries, permission will only be granted where the Council is satisfied that,  
-It is necessary in the light of the availability of recycled construction and demolition waste, or other more sustainable sources of material;-  
Environmental quality and amenity will be fully protected, and;  
-Appropriate provision for the restoration of the landscape is being made.'~~

## CE CH 5.11

Include the following new objective:

Objective RFxx *'Protect and safeguard the County's natural aggregate resources from inappropriate development, by seeking to prevent incompatible land uses that would interfere with the efficient development of such resources.'*

## CE CH 5.12

Omit Objective RF84 from Section 5.3 'Land Reclamation and Aggregate Extraction:

~~'Consider proposals for extraction only where the Council is satisfied that environmental quality and amenity will be fully protected and appropriate provision for the restoration of the landscape has been made.'~~

And replace with the following:

## CE CH 5.13

Objective RF84 *'Ensure that proposals for extraction avoid significant adverse impacts on the environment and amenity of the area through environmental assessment, mitigation and appropriate provision for the restoration of the landscape.'*

## CE CH 5.14

### Rural Tourism

Amend Para. 5.1 and specifically the Statement of Policy for Rural Fingal to include the following:  
Statement of Policy

- Protect and enhance the attractiveness of rural towns and villages as places in which to work and live and as locations for appropriate sized enterprise, services and tourism investments *that are of benefit to visitors and the community alike*
- Promote rural development and encourage the sustainable development of resources in agriculture, horticulture, *agri-tourism, tourism, farm diversification, and renewable energy*

# PART TWO

---

*resources having regard to the ability of an applicant to demonstrate compliance with the principals and policies of sustainable tourism*

- *Protect Fingal's principle strengths and capitalise on the distinct tourism and recreational attractions that are on offer – scenic beauty, waterways, coastal areas and beaches, coastal towns and villages and built and cultural heritage*

## **CE CH 5.15**

Include the following after the second paragraph at 5.3 - Rural Tourism:

*The Fingal Tourism Strategy 2015-2018 estimates that tourism is worth €500m annually to the local Fingal economy and supports approximately 20,000 jobs across all sectors.*

*Fingal's close proximity to Dublin City Centre and the location of Dublin Airport within it's environs offers significant opportunities to expand the existing tourism offer and brand for the County. With Dublin's increasing importance as a popular destination for city-breaks, Fingal's coastal offering and rich built and natural heritage provide opportunities to attract visitors from the City Centre. Furthermore, the County can benefit from the constrained capacity of the City Centre and act as an accommodation base for those visiting Dublin and the wider area.*

*The Grow Dublin Tourism Alliance was established in 2014, to drive a new collaborative strategy to market the Dublin region in the international marketplace. - 'Dublin. A Breath of Fresh Air' a new tourism brand, was launched in October 2015. The brand encourages visitors to look beyond the City Centre, positioning Dublin as a coastal city with mountains and sea at its doorstep.*

*Fingal is excellently placed to contribute to the achievement of these targets. The Council will engage and collaborate with all relevant stakeholders to ensure the economic potential of the tourism sector is secured for the benefit of the local economy.'*

## **CE CH 5.16**

Amend the following Rural related objectives as follows:

Objective RF05 Preserve, protect and enhance the natural, built and cultural heritage features that form the basis of the attraction of Fingal's villages *as places to live, work and visit.*

## **CE CH 5.17**

Objective RF13 Promote the tourism potential of Fingal's villages, *including the coastal villages* by facilitating *their enhancement and* the provision of visitor services and accommodation *and* encourage collaboration between service providers and co-operate with the relevant bodies in the marketing and promotion of tourism in the area.

## **CE CH 5.18**

Objective RF61 Retain, appreciate and revitalise appropriately the vernacular buildings of Fingal by deterring the replacement of good quality vernacular buildings with modern structures and by protecting *and promoting the sympathetic maintenance, adaptation and re-use of* vernacular buildings where they contribute to the character of the rural area.

## **CE CH 5.19**

Objective RF97 Support and facilitate the work of Teagasc and other farming / local bodies within the county in the promotion of the rural economy, including agriculture development, rural diversification, *tourism adaptation*, and in the development of new initiatives to support farming.

# PART TWO

---

## **CE CH 5.20**

Objective RF117 Promote the development of appropriately located and sensitively designed campsites, *with required ancillary facilities*, as an alternative form of accommodation for visitors to the County.

# PART TWO

## Chapter 6: Economic Development

### Submissions Received Relevant to this Chapter

D00003, D00040, D00025, D00052, D00055, D00060, D00186, D00188, D00190, D00193, D00227, D00234, D00338, D00383, D00386, D00401, D00409, D00425, D00437, D00453, D00489, D00491, D00500, D00514, D00515, D00522, D00526, D00529, D00532, D00533, D00558, D00561, D00566, D00567, D00568, D00582, D00583, D00585, D00605, D00606, D00621, D00625, D00633, D00643, D00689, D00720, D00725, D00753, D00754, D00924.

### Summary of Issues

#### **Sustainable Economic Development**

Two submissions seek to 'Promote Swords as an aviation hub' and state this can be included in Objective ED04. Under Objective ED05 two submissions seek to expand this objective to include the following: 'Develop the old Motorola site on Balheary Road as education/training/research/SME site. Relocate Swords Men's Shed to this location and investigate a link up with DCU.'

#### **Supporting Infrastructure**

One submission refers to the need for better broadband and satellite for Wimbletown, Ballyboughal

#### **The Green Economy**

A submission welcomes the support provided to promote the 'green economy'. This looks at the potential to develop (in a sustainable manner), the Plan area, in the areas of research and development, energy efficiency, transportation, agriculture, food production, marine and tourism while reducing impacts on the environment.

#### **Retail Sector**

The submissions received in relation to Retail can be grouped into certain themes: those that relate to Table 6.1 Fingal Retail Hierarchy; Core Retail Areas and related objectives; discount foodstores; specific submissions from some of the main retailers relating to retail policy of the Draft Plan; submissions in relation to specific areas within the County; retail and economic development; sustainable retail development; non-retail uses/fast food outlets;

It is acknowledged in a number of submissions that the preparation of a new Retail strategy for the County is being postponed until preparation of a Retail Strategy for the Eastern and Midland Regional Assembly (EMRA).

A number of submissions have been made with regard to the Retailing Level (i.e. Levels 2, 3, 4 and 5) set out in Table 6.1 Fingal Retail Hierarchy. One submission refers to Donabate, Lusk and Rush which are categorised as Level 3 centres but are identified as Level 4 in the Retail Strategy for the GDA. While the submission acknowledges that there may be local rationale for the recategorisation it is requested that they revert to that contained in the GDA retail strategy pending a review of this strategy following the preparation and adoption of the RSES.

A second submission considers that the lands at Holywell, Swords should be designated as a District Centre, the rationale given that there was a requirement for a District Centre outlined as part of the Swords Strategic Vision 2035. It is recommended that the Local Centre zoned lands be amended to Level 4 or preferably Level 3 in the Fingal Retail Hierarchy.

# PART TWO

A submission recommends that Blanchardstown Village should be reclassified from Level 4 to Level 3, in order to promote its revitalisation.

Identify the need for modern supermarket facilities in Castleknock within the retail policy.

A submission seeks the retention of the current local objective no. 448 'Support provision of retail for local needs only' (Sheet 11 South Fringe, current Dev Plan) and Retail Objective no. 31 which states: 'Facilitate retail and services to meet local needs at Santry Demesne'. (Retail Strategy, Appendix 2 current Dev Plan) for local retail in Northwood is sought to support and reinforce the Level 4, Neighbourhood Centre guidance and designation as set out in the RSGDA.

A number of submissions have been made with regard to the types of retailing format set out in Table 6.1. One submission welcomes the new reference made in the table to supermarkets between 1,000 – 2,500 sq m as being suitable in Level 4 centres. The submission goes on to request that in order to show the differences between discount foodstores and mainstream foodstores, the description should be altered to 'medium-sized supermarkets' to better reflect niche supermarket service offered and appropriately highlight the type and scale of convenience retail development to be encouraged e.g. highlighting that larger, 'supermarket' type outlets are not favoured approach, as their scale would be more likely to compete with the Major Town Centres; while discount foodstores/medium -sized supermarkets are considered to be of a scale which could be limited to a localised catchment whilst providing a sufficient range of goods to meet convenience retailing needs.

One submission makes reference to 'one' supermarket being unnecessary in the retail hierarchy.

The Draft Development Plan and Retail Strategy should reflect the important role of the Discount Foodstore and a number of amendments to the Draft Development Plan are sought. A description of Discount Foodstores is suggested: "A type of Supermarket (as described by the Retail Planning Guidelines, 2012) normally, but not limited to, single level and net retail sales area not normally exceeding 1,700 sqm, selling a limited range of goods at competitive prices." This would allow flexibility for particular locations.

It is suggested the Draft Plan include a statement that Discount Foodstores are suitable for a network of Neighbourhood Centres and District Centres. It is contended that the smaller scaled convenience store or discount model represents a more sustainable, pedestrian accessible store representing a local convenience and top-up function where larger percentage of customers frequent a store more than once a week. The suitability of Discount Foodstores to develop in a network of neighbourhood and district centres should be formally acknowledged and maintained.

Support for sustainable retail development, vibrant town centres, villages and communities and a diversity of shops people can walk to is shown. To ensure sustainable retail development and to promote the vibrancy and vitality of town centres, the Development Plan should state that no new retail developments should be approved until a Town Health Check is undertaken.

## Retail Policy and Core Retail Areas

There were a number of submissions made relating to the Core Retail Areas shown in Figures 6.1 – 6.9 of the Draft Plan. These are as follows:

- Figure 6.1 Swords Core Retail Area: Amend to include the ancillary carparking of the Pavilions.

# PART TWO

- Figure 6.2: Blanchardstown Core Retail Area: Welcome the acknowledgement of the retail contribution provided at West End Village which is included in Figure 6.2, however the inclusion of Verona Clubhouse and Sports pitches appears to undermine the existing town centre, the submission also makes reference to Objective Blanchardstown 3 to support their case. This objective is as follows: 'Promote the consolidation and densification of the core retail area of Blanchardstown Town Centre as a major centre in Fingal through the promotion of residential development in addition to the uses contained within the MC zoning.'
- Figure 6.8 Lusk Core Retail Area: amend to include the Station Road Masterplan lands.

A further submission proposes changes to the wording of ED36 and ED41, these objectives relate to the core retail areas.

## **Retail and Economic Development**

The Draft Plan should recognise the importance of the retail sector to the local economy as highlighted within the Retail Planning Guidelines 2012.

The Development Plan should acknowledge that supermarkets are an important employment generating enterprise, which should be reflected in the various employment zoning objectives in the Development Plan, such as RS, GE, HT and RW zonings. It is recommended that a more flexible approach be taken in relation to possible future locations for retailing.

A number of submissions received discuss the relative value of the RW zoning and its location.

## **Non-Retail Uses, Fast Food Outlets, Takeaways, Off Licences and Betting Offices**

A submission states that there has been an increase in fast food outlets and betting shops and a decline in most other forms of suitable town centre type businesses in Balbriggan. Footfall is almost non-existent. The Council should restrict such uses and encourage suitable town centre businesses.

A submission considers that the Planning system is not the appropriate vehicle in which to address the matter of obesity. Therefore, it is requested that Objectives ED51 and ED52 be removed. This submission also requests the amendment/removal of Objectives DMS 106 and DMS107 respectively, set out in Chapter 12. The objectives relating to Chapter 12 will be dealt with under the Chapter 12 report.

The submission from the Irish Heart Foundation seeks to strengthen Objectives DMS106 and DMS107 to provide exclusion zones for takeaways close to schools. Objective ED52 is also referred to in this submission.

## **Retail in Specific Areas**

### **Northwood**

It is proposed that lands at Old Ballymun Road, Ballymun/Santry should be rezoned from ME to LC and include the site as 'Northwood West' in the Fingal County Retail Hierarchy, as a Level 4 Local Centre. This would allow for the development of a supermarket in accordance with footnote 26 of the zoning matrix.

### **Blanchardstown**

One submission acknowledges and supports a change of zoning from RS to TC at a site off Main Street, Blanchardstown Village, and hopes this zoning will remain on the subject site.

# PART TWO

---

## Balbriggan

An expansion of Millfield Shopping Centre Balbriggan is recommended by rezoning lands from 'RA' to 'MC'.

## Skerries

The continued activity of small and medium sized retail units should be supported, encouraged and protected and this should be specifically reflected in the wording of the relevant objectives. Objective ED42 appears to prioritise the protection of larger retail developments over preservation of the function of town centres, this is inappropriate and should be deleted. In order to support the goal to “consolidate and enhance” the retailing function of Skerries, meeting the town’s “potential to perform over the Draft Plan period to a higher retailing level due to the strength of their resident-population and catchment-population” the Development Plan should take cognisance of the smaller retail centres located at Shenick Road and Skerries Point. Enhancing the retail functions of these locations with continued provision of small retail opportunities for local residents will be crucial to maintaining the character of the town, managing travel and traffic within the town, and meeting the retail potential of the town. This is especially desirable as the population is set to grow in the vicinity of these locations with developments at Barnageeragh Cove and Hacketstown. As part of further enhancing the function and potential of our town centres an objective should be added to support the provision of free public WiFi in town centres.

## Tourism Sector

The submissions made in relation to Tourism are summarised into the following categories: sustainable tourism; new zoning/modification of zoning for hotel and tourist accommodation; recreational trails network; integrated tourism complexes.

A comprehensive submission has been made by Fáilte Ireland. Fáilte Ireland promotes the incorporation of the principles of sustainability in the County Development Plan. The submission includes five principles which have been prepared to encapsulate the need to achieve a balance between appropriate tourism development and economic, environmental and social sustainability.

In relation to specific objectives, the submission is positive in relation to a number of these i.e. those relating to the Green Economy (ED22-ED24); objectives providing positive support for tourism as an economic driver in the County (ED55-62); Objectives relating to marine sector under ED77, ED81, and ED83. The submission is also supportive of objectives ED63-ED67 regarding recreational trails network, this issue is addressed further in report under 'Recreational Trails Network' heading. Amendments are suggested regarding a number of objectives: Objective ED58 is considered a good objective but would be strengthened with an additional reference to sustainability with added text as underlined: “Direct the provision of tourist related facilities, such as information offices and cultural centres, into town and village locations to support and strengthen the existing economic infrastructure of such centres. In all cases, the applicant must submit a robust assessment setting out the sustainability of any proposal with respect to economic, environmental and social sustainability, as defined herein.”

ED68 is considered to be a good objective that would be strengthened with added text as underlined: “Facilitate, where appropriate, the conversion of former demesnes and estates and their outbuildings into integrated tourist, leisure and recreational complex type developments subject to architectural conservation, best practice and proper planning and sustainable development and to adopt a positive interpretation to plan policies to encourage and facilitate such developments.”

# PART TWO

---

A submission recommends the identification of a new zoning objective to support and facilitate the development of hotel and other tourist accommodation uses, having regard to Section 6.9 Tourism Sector and related policies and objectives for hotels.

## **Recreational Trails Network**

A large number of submissions relate to the recreational trails network with suggestions given for specific walking and cycling routes. These include:

1. Royal Canal Greenway.
2. Guinness Bridge , Liffey Valley – suggested that this bridge would serve as an access point for pedestrians to the Phoenix Park, could be used as an alternative route as part of the Liffey Greenway plan, tourist potential of the route.
3. Donabate/Portrane/Malahide.
4. Coastal walk from North Beach to Loughshinny.
5. Detailed submission seeking the promotion, development and expansion of walking and cycling routes throughout the County.

Fáilte Ireland are supportive of Objectives ED63-ED67 supporting a recreational trails network and suggest that these trails would benefit from being mapped in the Development Plan.

## **Integrated Tourism Complexes (ITCs)**

There were a number of submissions made in relation to Integrated Tourism Complexes (ITCs), the submissions can be summarised as seeking the following: insertion/reinstatement of local/specific objectives; inclusion in list of ITCs; amendment of objectives; preparation of Masterplan or Framework Plans for particular demesne lands. The submissions relate to Hampton Demesne, Balbriggan, Beech Park House, Clonsilla, Turvey Demesne, Donabate, Roganstown Hotel and Country Club, Swords, and Abbeyville Demesne, Kinsealy.

## **Location of Employment**

There is a need to ensure that Fingal have adequate lands available for development to attract foreign multi-national companies.

A submission states that more GE land is required in the Draft Plan to accommodate the size of sites being required by single end users, within the area between the N2 and N3 link highlighted.

Concerns are expressed regarding industrial units and factories which in turn will increase traffic noise and pollution. In particular concerns are expressed regarding increased airport noise bouncing off the new warehouse recently built in the vicinity of property at Harristown Lane.

The original Metro North Scheme as proposed by the RPA and approved by An Bord Pleanála in 2010 is the best option for North County Dublin. A park and ride could be built in Lissenhall Little or Lissenhall Great, to facilitate commuters to Dublin City Centre. The service has a very high capacity potential which would be future proof. The proposed Metro North alignment has formed the basis for spatial plans within the study area for some time, therefore it integrates with future planning proposals. The scheme has already been through the required statutory planning processes and was granted planning approval to be developed. The cost of the scheme is high relative to all other schemes being assessed however this is a long-term solution.

A detailed submission has been made seeking the promotion of Balbriggan in the Development Plan in terms of enterprise and employment, with suggestions made such as a Master plan and

# PART TWO

---

Marketing Plan, developing a Balbriggan Enterprise Zone, and developing a marketing strategy for attracting new industry to Stephenstown, among other suggestions.

A submission requested that an Enterprise Development Officer and new local Enterprise representative be specifically employed for Balbriggan.

It is requested that an objective to promote 'co-working spaces' which would make it easier for a co-working space to be set up in Skerries is included.

## **Land Use Zonings and Sectoral Building Requirements**

A number of submissions seek the inclusion of specific objectives; amendments to Local Area Plans/Masterplans under Objectives ED85 and ED86.

A submission seeks to amend Objective ED85 to remove the requirement to prepare an LAP for lands at Cloghran and to amend Objective ED86 to require the preparation of a Masterplan or Framework Plan for lands at Cloghran.

A new objective is proposed which seeks to ensure the Dardistown LAP is fully incorporated into the Fingal County Development Plan 2017-2023 and to seek early implementation of same within the lifetime of the CDP.

A submission refers to the Clonshaugh Masterplan MP11.C. The submission seeks an amendment to the Masterplan boundary and feel an amalgamation of the lands to form a Masterplan are impractical and not supported. A Masterplan is currently in preparation for the subject lands. The submission wishes to develop independently of the adjoining IDA lands.

A submission welcomes the GE zoning objective for the Horizon Logistics Park at Harristown, (Dubber Masterplan MP11.B) but question the appropriateness of including a requirement to prepare a Masterplan for such an extensive area of GE zoned lands, a significant portion of which is zoned RU under the current Development Plan.

A further submission relates to lands within the Masterplan MP 11.A Northwood, which seeks to remove the lands from the Masterplan area or include a specific objective on the site as follows: 'The lands between the R108 and the Old Ballymun Road shall be allowed to bring forward proposals for development in advance of the preparation of a Masterplan for the area (11.a), and applications will not be dependent upon the preparation and agreement of a Masterplan or prepare the Masterplan for the area without any further delay, after the making of the Development Plan and within the first year of the new Plan.'

## **Other Issues**

### **Local Area Plans**

Preparation of Local Area Plans – There is a concern where development proposals have been prejudiced by lack of advancement of proposed LAPs (example given in Ballymun Road area). If LAPs are unlikely to be forthcoming or resourced within next 6 year plan period their inclusion should be carefully considered (or rather non inclusion considered) or ensure clear policy statements and objectives that their lack of preparation not be held as prejudicial to development (example given of LAPs for the Metro Economic Corridor Area in the current Plan prejudicing/constraining development).

A submission recommends the removal of the provision for Masterplans from the Development Plan and to allow instead for the creation of developer-led area plans which may then be agreed with the local authority at planning application stage.

# PART TWO

## **Chief Executive's Response**

### **Sustainable Economic Development**

The recommendations under ED04 and ED05 are noted. These are specific objectives which would be more appropriately dealt with under Chapter 4 relating to Swords and also through the Masterplan process and the development management process where they apply.

### **Supporting Infrastructure**

The *Regional Planning Guidelines 2010-2022* recognise the need to facilitate rural development by improving the overall viability of the rural economy together with the provision of improved Information and Communications Technology (ICT), particularly broadband. Access to and cost of high quality broadband emerged from the CEDRA report as one of the most significant challenges faced by rural communities particularly from a business perspective. While many rural businesses and households have access to a basic broadband service they are unable to access the kind of cost effective, high capacity internet services that are required in a modern business environment. In a significant number of areas the quality and types of services that are currently available are not sufficient to support efficient and effective business practice. While improved broadband speeds are a national issue, it is particularly important to ensure next generation broadband for rural businesses and e-working. The Council will support the expansion and rollout of high speed broadband services as an essential component of rural living and business. This is reflected in Objective RF102, which states: *'Support and facilitate the expansion and rollout of high speed broadband services within rural areas.'*

### **The Green Economy**

The Green Economy refers to an increasingly sustainable approach that has been advocated in recent years for undertaking and engaging in economic activity. It *'encompasses a range of activities, spread across different sectors of the economy, which have the common objective of providing goods and services in a sustainable way that reduce the impact on the environment'*. The Green Economy approach to economic development has been identified as an area of significant growth with potential for notable enterprise and employment creation. The 'green' potential has been identified in sectors and/ or activities such as research and development, innovation, energy efficiency, transportation, agriculture, food production, marine, tourism, and procurement. The Council will ensure that a sustainable approach is taken to enterprise development and employment creation across all sectors of the Fingal economy.

### **Retail Sector**

The retail planning policy context for the Draft Development Plan is informed by retail guidance documents at the national and regional levels. Respectively, these include *Guidelines for Planning Authorities: Retail Planning (2012)* and the *Retail Strategy for the Greater Dublin Area, 2008-2016*. Additionally, Fingal's Retail Hierarchy is required to accord with the settlement hierarchy identified for the County in the *Regional Planning Guidelines for the Greater Dublin Area 2010-2022* (RPGs) issued in 2010 by the Dublin and Mid East Regional Authorities.

The reclassification of the towns of Donabate, Lusk and Rush to level 3 status as part of the Retail Strategy was proposed under the Draft Plan to align with the 'Moderate Growth Town' status defined for these settlements as part of the RPGs. It is considered that these towns effectively function as Moderate Growth Towns with higher performing urban centres and in this regard the retail status of these towns should reflect this. That said, it is acknowledged that these towns are designated at level 4 in the retail hierarchy as set out in the GDA Retail Strategy 2008-2016 and accordingly, it is recommended that they be reclassified to reflect this in the final Plan.

## PART TWO

A policy should however be included to review the promotion of Donabate, Lusk and Rush as Level 3 Major Town Centres as part of any future revised Retail strategy for the GDA.

Level 4 centres should generally provide for one supermarket ranging in size from 1,000-2,500 sq m with a limited range of supporting shops (low order comparison), supporting services, community facilities or health clinics grouped together to create a focus for the local population. This level of centre should meet the everyday needs of the local population and surrounding catchment. A Level 4 classification is considered appropriate for Blanchardstown Village as it is an important urban centre which has a distinctive character. In retailing terms it serves a smaller but established resident-population and catchment-population than a Level 3 centre. Blanchardstown Village is an attractive commercial centre which complements the town centre to the west. In the last number of years there has been an expansion of services in the Village in the form of small offices providing a wide range of professional services. There are a number of specific objectives contained in Chapter 4 of the Draft Plan which will support the revitalisation of Blanchardstown Village. An Urban Framework Plan will be prepared is proposed for Blanchardstown Village under Objective Blanchardstown 1.

There is a Local Centre zoning at the junction of the R125 and the Holywell Link Road (Swords) on which there is an extant permission (F12A/0046/PL06F.241043) for local community and commercial facilities including a medical centre, cafe/restaurant unit, 2 local retail units and an anchor retail unit with subsidiary alcohol sales. The net retail floor area of the supermarket granted is 2,494 sq m which under the current Development Plan was below the threshold of 2,500 sq m permitted for Local Centre zoning. Under the permission it was considered that the site was a Level 4 centre under the Retail Hierarchy, as described in Section 4.1 of Fingal's Retail Strategy. This still applies. There is a Level 5 centre included in Table 6.1 Fingal Retail Hierarchy at Holywell, however this appears to refer to the Local Centre within the Holywell development. For clarification, it is considered that Table 6.1 should be amended to include the Local Centre zoning at the junction of the R125 and Holywell Link Road as a Level 4 centre.

Castleknock Village is zoned TC Town and District Centre in the Draft Development Plan. The need for modern supermarket facilities within Castleknock has been identified through its classification in Table 6.1 Fingal Retail Hierarchy as a Level 4 centre.

The submission from Dublin City Council seeks the retention of the current local objective no. 448 and Retail Objective No. 31 for local retail in Northwood to support and reinforce the Level 4, Neighbourhood Centre guidance and designation as set out in the RSGDA. The town centre of Ballymun has 'shopping redevelopment potential' (Retail Strategy for the GDA 2008) and is defined as a Level 3 District Centre. Due to high retail expenditure leakage in Ballymun, a key recommendation by Dublin City Council is the opening of another food store along Main Street in Ballymun, to assist the continued build out of Main Street and the creation of a 'heart/focal point' to Ballymun which has been lost with the demise of the Shopping Centre. Having regard to the rationale provided, it is considered reasonable to reinstate local objective no. 448 which states: 'Support provision of retail for local needs only'. It is noted that the ME zoning on these lands only allow for local shopping to be provided.

Section 4.11.1 of the Retail Planning Guidelines 2012 refers to 'discount foodstores' as follows: *'The distinction between 'discount stores' and other convenience goods stores which was contained in the 2005 Retail Planning Guidelines will no longer apply.'* In order for the Draft Development Plan to comply with the Retail Planning Guidelines, the use of the term 'discount foodstore' is not used in the Draft Development Plan. Instead Discount foodstores are considered under the retail format

# PART TWO

'Supermarket' which are permitted under the MC, TC and LC zonings. There is therefore wide scope for such stores to locate throughout the County.

The reference to 'one' supermarket refers to Level 4 centres (set out in Table 6.1 Fingal Retail Hierarchy) has been taken from the Retail Strategy for the GDA and provides a general guideline of the average size of retail in such centres.

There are a number of objectives contained in Chapter 6 which seek to support sustainable retail development, maintain and strengthen the vitality, viability and regeneration of the Major Town, Town, Local and Village Centres. With regard to new retail developments the overriding policy approach is that new significant retail development should be directed primarily into the major town centres, and town centres in the County (Level 2 and Level 3) and be in accordance with the scale, type and retail formats included in the Fingal Retail Hierarchy. A similar approach will apply to new retail development for small towns, village centres, local centres and small villages (Level 4 and Level 5), with a strong emphasis on being of an appropriate scale and offer to sufficiently meet local retailing needs.

The existing policy and objectives in the Draft Development Plan, in particular Objectives ED36 and ED37 comprehensively address significant retail development and applications for new retail development respectively, with all applications being assessed in accordance with the requirements of the *Guidelines for Planning Authorities: Retail Planning*, including, where appropriate, the application of the Sequential Approach, and requirements for retail impact assessments and transport impact assessments for retail developments which due to their scale and/or location may impact on the vitality and viability of major town, town, local and village centres, while having regard to the impact such directions/developments may have on the existing businesses operating within the area. Having regard to the above, it is considered that Town Health Checks are not necessary.

## **Retail Policy and Core Retail Areas**

The core retail areas are defined in the *Guidelines for Planning Authorities: Retail Planning 2012* by the Department of Housing, Planning Community and Local Government as 'That part of a town centre which is primarily devoted to shopping.' Core retail areas are defined as the area including and immediate to the 'prime pitch'. This is the area which achieves the highest rentals, best yields, and is highest in demand from retailers/operators and highest footfall of shoppers. The importance of defining the core retail areas is based on the application of the sequential approach. In order to apply the sequential approach it is necessary to identify the core retail areas. Those which relate to Levels 2 and 3 of Table 6.1 Fingal Retail Hierarchy have been mapped out in Figures 6.1 – 6.9 of Chapter 6 and are as follows: Swords, Blanchardstown, Balbriggan, Malahide, Skerries, Charlestown, Donabate, Lusk and Rush.

The proposal to amend the Core Retail Area of Lusk (Figure 6.8) seeks to include the Station Road Masterplan lands also. Having regard to the decision to reclassify Lusk, Rush and Donabate as Level 4 centres, and only the Core Retail Areas of Level 3 centres included in the Draft Plan, it is considered that Figures 6.7, 6.8 and 6.9 be removed from the Draft Plan.

With regard to the Pavilions, it is considered reasonable to extend the Swords Core Retail Area to include the ancillary car parking.

Having regard to the extent of the existing and established Core Retail area of Blanchardstown Town Centre, it is considered appropriate to remove the playing pitches at Verona from Figure 6.2 Blanchardstown Core Retail Area.

# PART TWO

A submission proposes to amend Objectives ED36 and ED41, to include lands zoned MC and TC. As stated, the importance of defining the core retail areas is based on the application of the sequential approach to promote town centre vitality within Levels 2 and 3 urban centres. In order to ensure the sequential approach policy is achieved, it is not considered appropriate to amend objectives ED36 and ED41.

## **Retail and Economic Development**

The Draft Plan acknowledges the importance of retail and states: 'The economic importance of the retail sector to the national economy is identified with some 270,000 jobs associated with the sector, the largest share of employment in the national economy. The sector is an intrinsic component of the domestic economy as it has a direct presence in each locality and community.' It provides employment in our major town centres, town centres, local centres and at village level, where the local village shop is an intrinsic part of many of Fingal's rural villages.

The Retail Planning Guidelines contain five overriding policy objectives that planning authorities are to follow and implement so that planning can support the retail sector, whilst also ensuring the delivery of sustainable retail developments and the vitality and vibrancy of the County's urban centres. These objectives which are incorporated in the Draft Development Plan are as follows:

- Ensuring retail development is plan-led;
- Use of the sequential approach to retail development to promote town centre vitality;
- Securing competitiveness in the retailing sector through quality designed and suitably located projects;
- Increasing access to retailing opportunities through more sustainable forms of transport than the private car; and
- Delivering quality urban design outcomes.

The Retail Strategy for the GDA provides projected floorspace requirements for convenience and comparison retailing in Fingal up to 2016 and defines the retail hierarchy within the County, with locations identified and recommendations made on the appropriate type and scale of retail provision at these various locations. The retail hierarchy for the County as defined in the Retail Strategy forms the basis of the Fingal Retail Hierarchy, set out in Table 6.1.

Having regard to the requirements contained in the Retail Strategy and the Retail Planning Guidelines, with an emphasis on promoting town centre vitality and vibrancy and reducing reliance on the car for retail trips, it is not considered appropriate to increase the level of retail which is permitted within the RS, GE, HT, RW zonings as requested in the submission. Note: currently Retail-Local less than or equal to 150 sq m nfa, to serve the local working population only is permitted in the GE and HT zonings. In terms of existing RS zoned areas these are served by MC, TC, LC zonings which cater for the commercial needs of existing populations. No retail is permitted in the 'RS' zoning.

To allow retailing in RS zoning and increased retailing in the GE, HT, and RW zonings would be contrary to retail guidance at national and regional levels. Secondly, it would seriously undermine the vitality and viability of existing Major Town Centre, Town Centre, Local Centre and Village zonings, some of which are already experiencing difficulties in terms of vacancy levels. It is recommended that no changes be made to retail levels in the RS, GE, HT or RW zonings.

Notwithstanding the above, on consideration of the existing levels of retail zoning, it is noted the quantum of RW zoned land is one of the lowest compared to other employment generating zoned land within the county (See Table 6.3 of the Draft Plan). A substantial proportion of these

# PART TWO

---

'RW' zoned lands are already developed or committed for development. Only limited amounts of zoned RW lands remain undeveloped to date. This includes the subject lands located at Airside in Swords. Therefore it is considered appropriate to increase the quantum of RW lands. The most appropriate location is adjacent to the existing RW at IKEA and it is recommended lands measuring 2.8 ha are zoned here.

It is also recommended regard is had to the Retail Planning Guidelines advice on innovative types of retail development and text is included within Chapter 6 to reflect this.

## **Non-Retail Uses, Fast Food Outlets, Takeaways, Off Licences and Betting Offices**

An important element of supporting the quality, ambience, vibrancy and vitality of urban and village centres is promotion of an appropriate mix of day and night-time uses, including commercial, recreational, civic, cultural, leisure and residential uses.

Associated with protecting and enhancing the vitality and viability of the County's urban and rural centres, is addressing the occurrence of non-retail uses (such as amusement centres and arcades), fast food outlets, off licences and betting offices. An over-supply or dominance of these types of uses within the main streets, shopping centres and local centres of Fingal's centres can have negative impacts on the amenities of these centres and their ability to perform their retailing function in accordance with their classification in the Fingal Retail Hierarchy. Throughout Section 6.9 there are objectives to support vitality and vibrancy of urban and village centres. Specific objectives are included to address the occurrence of non-retail uses to ensure that injury is not caused to the amenities of these streets and centres through the loss of retail opportunities – these are Objectives ED51 and ED52. (also dealt with in Chapter 12 under Objectives 106 and 107). It is recommended that Objectives ED51 and ED52 should remain unchanged in the Draft Plan.

In relation to Balbriggan, it was identified as having particularly high rates of vacancy in its core retail area and as being especially vulnerable to the negative effects associated with vacancy such as loss of retail offer, degradation of building stock and resultant injury to the public realm experience. The Council's policy in relation to vacancy in the County's centres is to use all available measures to tackle the problem and support measures and actions identified in action frameworks such as the Local Authority Retail Support: Improving our Cities and Towns, June 2015. Specific objectives are also set out in Chapter 4 for Balbriggan, in order to promote and facilitate its development and regeneration.

## **Retail in Specific Areas**

### **Northwood**

The lands are in close proximity to Metro North and consequently should be developed for high density mixed use employment generating activity and commercial development, and support the provision of an appropriate quantum of residential development within the Metro Economic Corridor. It is noted that under the ME zoning retail up to 2,500 sq m is permitted in principle under this zoning. It is recommended that no change to zoning take place.

### **Blanchardstown**

The Planning Authority supports the change in zoning from RS to TC. As the existing RS lands are located immediately contiguous to the existing TC zoned lands on Blanchardstown Main Street and are of a relatively modest nature, this zoning is acceptable.

### **Balbriggan**

The rezoning proposal will be dealt with under Sheet 4 Balbriggan response.

# PART TWO

---

## **Skerries**

Skerries is classified as a Level 3 centre in Table 6.1 Fingal Retail Hierarchy. Level 3 of the Fingal Retail Hierarchy includes key urban centres well distributed geographically throughout the County, with significant resident-populations and also serving wider catchment areas, some into rural areas. This retail tier includes Balbriggan, Malahide, Skerries, Charlestown, Donabate, Lusk and Rush. While these towns are unique with distinctive characters and historic development, they perform and have further potential to perform over the Draft Plan period to a higher retailing level due to the strength of their resident-population and catchment-population. These Town Centre locations have at least one convenience store, a range of middle order comparison retailers and a range of supporting retail services. The Council's policy in relation to these Town Centres is to consolidate and enhance their retailing functions balanced with the wider range of leisure, community and civic functions they offer. Objectives ED40-42 set out the retail objectives relating to Level 3 centres.

The submission made with regard to retail centres at Shenick Road and Skerries Point is welcomed. These centres in Skerries are Holmpatrick Shopping Centre located on Shenick Road, and Skerries Point Shopping Centre, Kelly's Bay Parade, Skerries. Both of these centres contain the LC Local Centre zoning and are important centres which support residential development at Hacketstown and Barnageeragh respectively. It is recommended that these two Local Centres be included as Level 5 centres in Table 6.1 Fingal Retail Hierarchy.

## **Tourism Sector**

The submission from Fáilte Ireland is considered to be a comprehensive document and the suggestions made are to be welcomed. It is considered that the points raised in relation to sustainable tourism are important and further detail is recommended in the Development Plan to emphasise the importance of sustainable tourism and the need to protect our landscapes and built and natural heritage. It is considered that objectives ED58 and ED68 should remain unchanged. Development proposed under these objectives will be dealt with under the development management process, having regard to relevant zoning, objectives and policies of the Development Plan. A *new* objective is recommended to further highlight the importance of the tourism sector within Fingal.

Hotels are permitted in principle in the DA, MC, ME and TC zonings. They are deemed open for consideration in a number of other zonings. This is the most appropriate designation and any application for this type of development will be assessed on a case by case basis and on their merits with regard to issues including conformity with relevant policies, objectives and standards contained within the Plan, and compatibility of proposed land use at the subject site. On consideration of the locations suitable for the development of hotels, it is appropriate to amend the RW zoning to allow this type of development to be open for consideration. The land use zonings relating to a hotel use are considered sufficient to support the provision of such accommodation to meet the needs of the tourism sector in Fingal.

## **Recreational Trails Network**

The submissions relate specifically to the Royal Canal Greenway and walking and cycling routes within the County.

Fingal County Council is currently moving ahead with the planning and environmental assessments required for the most critical link of the coastal way across the Malahide viaduct linking Malahide Demesne to Newbridge Demesne. Fingal County Council recognises the development of recreational trails and associated services requires coordination and

# PART TWO

---

cooperation with and between stakeholders and landowners. The long-term success of this trail network and its development is dependent on a fully integrated approach.

Objectives ED63-ED67 deal with the Recreational Trails Network. Under Objective ED64 it is stated: 'Develop a Recreational Trails Plan for the County in conjunction with relevant stakeholders, landowners and various community interest groups within the lifetime of this plan. This plan shall set out a coordinated strategic framework for future recreational trail development in the County.' The development of the recreational trails network within the County is proposed at three levels: i) the strategic level [e.g. Fingal Coastal Way, the Liffey Valley area, and the Royal Canal Greenway], ii) town trails including Sli na Slainte and iii) village trails. These trails will be mapped in the Recreational Trails Plan. The success of these trails depends on a coordinated strategic framework set out in the Recreational Trails Plan.

The positive sentiments of the submission in relation to the Royal Canal Greenway are welcomed. The Development Plan process is not the appropriate mechanism to discuss the design details of the Royal Canal Greenway. A feasibility Study was conducted in 2012 and a section of the greenway between Ashtown and the 12th Lock is complete. The remainder of this route will be completed in collaboration between Kildare and Fingal County Council.

Cycle and pedestrian routes will be investigated, where appropriate, as part of the strategic greenways which will be identified within the Recreational Trails Plan. The Recreational Trails Plan will include a public consultation process where relevant stakeholders and interested parties will have an opportunity to make submissions. Any parties interested in walking and cycling trail development in the County will have an opportunity to make submissions in this regard and will be considered in the context of the Recreational Trails Plan.

The submission relating to the Guinness Bridge is noted. The Guinness Bridge (Silver Bridge), traverses the River Liffey, and is a Protected Structure (no. 754) recorded under Appendix 2 of the Draft Development Plan. The Draft Development Plan contains a local objective no. 148 identified on Sheet 13 Blanchardstown South in relation to this bridge. It is set out under Appendix 6 Map Based Local Objectives, and states: '*Restore the Metal Bridge on the Lower Road and utilise it as a strategic pedestrian/cycle link from Farmleigh public car park to Waterstown Park via Coates lands in co-operation with South Dublin County Council.*'

## **Integrated Tourism Complexes (ITCs)**

There were a number of submissions made in relation to Integrated Tourism Complexes (ITCs), the submissions can be summarised as seeking the following: insertion/reinstatement of local/specific objectives; inclusion in list of ITCs; amendment of objectives; preparation of Masterplan or Framework Plans for particular demesne lands. The submissions relate to Hampton Demesne, Balbriggan, Beech Park House, Clonsilla, Turvey Demesne, Donabate, Roganstown Hotel and Country Club, Swords, and Abbeyville Demesne, Kinsealy.

The Council will encourage the development of integrated tourism/leisure/recreational complexes in demesne type landscapes where such uses are consistent with the retention of such landscapes. The conservation of these assets into the future is essential and the Council recognises the need for the appropriate sustainable reuse of the buildings.

Objective ED68 of the Draft Development Plan provides for the development of Integrated Tourism Complexes within demesne type settings. This objective is as follows: 'Facilitate, where appropriate, the conversion of former demesnes and estates and their outbuildings into

## PART TWO

integrated tourist, leisure and recreational complex type developments subject to architectural conservation best practice and proper planning and sustainable development.'

Objective CH21 relates to the reuse, rehabilitation and retention of Protected Structures and states the following: 'Encourage the sympathetic and appropriate reuse, rehabilitation and retention of Protected Structures and their grounds including public access seeking that the Protected Structure is conserved to a high standard, and the special interest, character and setting of the building preserved. In certain cases the relaxation of site zoning restrictions may be considered in order to secure the preservation and conservation of the Protected Structure where the use proposed is compatible with the existing structure and this will only be permitted where the development is consistent with conservation policies and the proper planning and sustainable development of the area.'

Roganstown Hotel and Country Club, Swords contains an existing Integrated Tourism Complex which was granted permission in 2000. This submission sought the reinstatement of Local Objective No. 258 (current Fingal Development Plan 2011-2017) which states: 'Facilitate the existing integrated tourism and recreational complex at Roganstown. The nature and extent of the facilities provided is confined by the primary use of the site for recreation and tourism use and the need to conserve the special landscape character and heritage features of the site.' Roganstown retains its status as an ITC and Objective ED68 continues to apply to the site. Therefore there is no requirement for the reinstatement of local objective no.258 on these lands.

Hampton Demesne, which is located to the east of Balrothery contains Protected Structure Nos. 91 (former outbuildings of Hampton Hall) and No.92 (six-bay two-storey house, former home of Hamilton family) respectively. Beech Park House, located to the south-west of Clonsilla village contains the Protected Structure Nos.709 and 710 which comprise the 'former outbuildings of Beech Park house' and the 'house, lodge and gates'. It is considered Hampton Demesne and Beech Park Houses can be added to the list of Integrated Tourism Complexes in Chapter 6. Site specific proposals for these areas can be appropriately dealt with under the Development Management process having regard to Objectives ED68 and CH21 of the Draft Development Plan.

Turvey Demesne, Donabate, Turvey House is currently listed as a Protected Structure in the current Development Plan (RPS No.492). The review of the Record of Protected Structures is currently on public display until 29<sup>th</sup> July 2016. Turvey House was demolished in 1987 after it had fallen into disrepair. The site was developed as a golf course and clubhouse but there are still some fragmentary remains of Turvey House and its ancillary buildings. These though are not sufficient structural remains to warrant its retention on the Record of Protected Structures. Alternative protection for the site of the Medieval tower house exists under the National Monuments Act 1930-2004 as a Recorded Monument, RMP Ref. DU008-024001. As there is not sufficient structural remains left of Turvey House it's inclusion in the list of Integrated Tourism Complexes is not warranted.

### Abbeyville

Chapter 6 at present states the following in relation to Abbeyville:

'An integrated tourism and recreational complex is encouraged on Abbeyville Demesne. This shall incorporate facilities which may include: Hotel / Conference Centre, Golf Course, Fitness Centre and at least one other extensive tourist/recreational facility. A strictly limited number of dwelling units, preferably grouped in a courtyard type configuration, which shall be reserved for tourism use. The nature and extent of the facilities to be provided shall be determined primarily by the need to conserve the house and its surroundings, which are of major architectural

## PART TWO

---

importance, and the special landscape character and heritage features of the demesne.'

And the corresponding objective states:

*Facilitate, where appropriate, the conversion of former demesnes and estates and their outbuildings into integrated tourist, leisure and recreational complex type developments subject to architectural conservation best practice and proper planning and sustainable development.*

The Demesne lands have a significant heritage and planning history. Abbeville house is a protected Structure (RPS Ref. 452) of national importance. It is the work of renowned architects and was also the home of historically important figures from the 18<sup>th</sup> century through to the early 21<sup>st</sup> century. The house and lands forming the demesne are designated as an Architectural Conservation Area (ACA), with historic woodlands and other natural and man-made features and landscape features. Since the beginning of this century the demesne has gone through a transition period, during which it temporarily lost its integrity and occupancy such that the condition of the house, buildings, woodlands and demesne features have disimproved. Unless there is substantial investment based on a viable future business plan and protection through occupation and use, the integrity of the demesne and all of its elements is at risk.

Objective CH 21 relates to a relaxation of site zoning restrictions in relation to the protected structures on a site. It is for the betterment of the existing protected structures on a site. This objective affords a level of flexibility on a future use for the existing protected structures on a site to ensure preservation and conservation of the existing protected structures on its attendant grounds. Chapter 6, under heading Integrated Tourism Complexes, Objective ED68 also applies. Section 5.2, subsection Vernacular Dwellings and Vernacular Outbuildings encourages the redevelopment and reuse of existing vernacular structures.

In order to emphasise the flexibility included in Objective CH21 it is considered appropriate that an objective relating specifically to Abbeville be included in the Draft Plan.

### **Location of Employment**

The selection of appropriate locations for employment uses within Fingal is determined by the principles of proper planning and sustainable development, which is a core component of the economic strategy for the County. The locations for employment development are also informed by the requirements of the *Regional Planning Guidelines for the Greater Dublin Area 2010-2022 (RPGs)*, which provides the Settlement Hierarchy for the County. Fingal has an optimum quantum of employment zoned lands provided at appropriate locations throughout the County. A wide variety of zonings are provided for to cater for employment opportunities across economic sectors through high technology, general enterprise and employment, food industry, heavy industry, mixed use employment, rural related business, retail warehousing, warehousing and distribution and airport related development. In terms of GE zoned lands there is a total of 1,829.7 ha zoned throughout the County, with a large percentage of these lands located within the Blanchardstown area, within the Dublin Enterprise Zone. The Council will collaborate with key stakeholders, relevant agencies and sectoral representatives in identifying suitable employment zoned lands for specific needs. Specific objectives are included in the Draft Plan to achieve this goal, such as Objective ED87 which states: Consider the allocation of various sizes of land parcels for economic development land use zonings in order to cater for a wide range of employment and enterprise formats. Local Area Plans and Masterplans will also be prepared for economic development generating lands and will inform a range of employment formats also. (Objectives ED84-ED86 refer).

# PART TWO

---

All planning applications for industrial units are dealt with through the Development Management Process and issues such as traffic noise and pollution are assessed having regard to European, National and Regional legislation. Objectives in relation to the protection of residents to traffic noise and pollution from proposed developments is set out in Chapter 7 Movement and Infrastructure.

Details relating to the Metro North Scheme will be addressed in Chapter 7 Movement and Infrastructure.

Balbriggan is located in the Hinterland area and will continue to function as the primary centre for economic development and for essential supporting infrastructure provision. The importance of Balbriggan is recognised in Objectives ED82 and ED83, as follows: ED82: 'Support economic growth within the Hinterland Area through strengthening and promoting the importance of Balbriggan as the major urban centre and directing appropriately scaled growth opportunities into the other urban centres in the Area.'

ED83: Ensure that settlements and locations within the Hinterland Area follow policies of directional development to ensure that the required economies of scale are achieved in specific centres such as Balbriggan, and that other lower tier settlements perform to their economic strengths and competitive advantages such as Skerries and Rush for tourism and marine activities.' Fingal County Council is committed to working with representative stakeholders such as the IDA, Enterprise Ireland and the local Chamber of Commerce, to attract and facilitate new employment generators into the town. There may be an opportunity for the aforementioned groups to consider the development of a Balbriggan Enterprise Zone similar to the Dublin 15 Enterprise Zone.

The request for an Enterprise Development Officer and new local Enterprise representative specifically employed for Balbriggan is a matter for the Economic, Enterprise and Tourism Development Department and not for the Development Plan process.

Co-working is a style of work that involves a shared working environment, often an office, and independent activity. Unlike in a typical office environment, those co-working are usually not employed by the same organisation. The concept of co-working is suitable for start-ups, entrepreneurs and freelancers. Opportunities exist where vacant/underused properties are available and can be used for co-working. It is considered that additional text and/or objective be included to address issue of co-working spaces.

## **Land Use Zonings and Sectoral Building Requirements**

All of the submissions which relate to specific rezonings, reinstatement of objectives, amendments/removal of lands subject to Local Area Plans/Masterplans will be addressed under the relevant Sheet number reports.

## **Other Issues**

### **Local Area Plans**

The requirements in relation to Local Area Plans and Masterplans will be dealt with under Chapter 3 Placemaking report.

## **Recommendation**

### **CE CH 6.1**

#### **Retail Sector**

Amend Table 6.1:

# PART TWO

Table 6.1: Fingal Retail Hierarchy

Retailing Level	Urban Centre Location	Zoning Objective	Types of Services	Appropriate Retail Format
Level 3: Town Centres	Balbriggan Malahide Skerries Charlestown Donabate Lusk Rush	Major Town Centre 'MC' Town Centre 'TC'	Level 3 Centres will vary in terms of scale of provision and the size of catchment based on their proximity to a Level 2 Centre. Generally where the centre has a large catchment (such as Balbriggan) and is not close to a major town centre, there should be a good range of comparison shopping (though no large department store), with a mix of uses and services, some leisure activities and a range of cafes and restaurants. At least one supermarket and a smaller scale department store may be required to meet local needs. Where the Level 3 Centre is close to an existing major town centre, the scale of retail and mixed use provision should be lower, with the proposed range of shops meeting more basic day to day needs, with only small scale range of comparison units trading. Level 3 Centres should generally cater for a population of between 10,000 and 40,000 people.	Middle Order Comparison Lower Order Comparison Superstore Supermarket
Level 4: Small Towns and Village Centres; and Local Centres	Blanchardstown Village, Mulhuddart, Clonsilla, Castleknock, Howth, Portmarnock, Baldoyle, Ongar, Sutton, Balrothery Applewood, Stapolin, Racecourse, Santry Demesne, Bayside, Castlemills, Carrickhill, Tyrellstown,	Town Centre 'TC' Local Centre 'LC'	Level 4 Centres should generally provide for one supermarket ranging in size from 1,000-2,500 sq m with a limited range of supporting shops (low order comparison), supporting services, community facilities or health clinics grouped together to create a focus for the local population. This level of centre should meet the everyday needs of the local population and surrounding catchment.	Lower Order Comparison (limited to a small number of shops meeting local needs) Supermarket

# PART TWO

Retailing Level	Urban Centre Location	Zoning Objective	Types of Services	Appropriate Retail Format
	Donabate Lusk Rush Roselawn and Rathbeale			

## CE CH 6.2

Before Objective ED01

*The Council will endeavour to continually review its employment strategy in order to ensure the allocation of sufficient quantum's of and types of lands for employment in urban and rural areas in line with the settlement hierarchy.*

## CE CH 6.3

After Objective ED35

*As part of any future review of the Retail Planning Guidelines for the GDA, the Council shall seek to align the retail designation of Donabate, Lusk and Rush as Level 3 Major Town Centres to reflect the status of these settlements as Moderate Growth Towns, as defined by the RPGs.*

- Include the Local Centre zoning at the junction of the R125 and the Holywell Link Road as a Level 4 centre in Table 6.1 of the Fingal Retail Hierarchy.
- Reinstate Local Objective No. 448 as follows: 'Support provision of retail for local needs only.'

## CE CH 6.4

### Retail Policy and Core Retail Areas

- Amend Figure 6.1 Swords Core Retail Area to include the ancillary car parking of the Pavilions (see appendices).
- Remove Verona Playing Fields from the Blanchardstown Core Retail Area (see appendices).
- Remove Figures 6.7, 6.8 and 6.9 Core Retail Areas for Donabate, Lusk and Rush from the Draft Development Plan as these centres have been reclassified from Level 3 to Level 4 centres.

## CE CH 6.5

### Retail and Economic Development

Amend Section 6.8, subsection Retail Warehousing and Retail Parks

*Notwithstanding the precautionary approach, Fingal and the Retail Planning Guidelines acknowledge there is evidence of consumer demand in Ireland for innovative types of large-scale retail warehouses which are capable of displaying a very wide range of bulky goods under one roof, together with a range of customer facilities. The scale of such outlets requires a regional, if not a national, population catchment. Accordingly, proposed exceptions to the 6,000 sqm retail warehouse cap may be considered on the merits of individual development applications.*

## CE CH 6.6

The RW zoning adjacent to IKEA is extended eastward, measuring 2.8 ha (see appendices).

# PART TWO

---

## CE CH 6.7

### Retail in Specific Areas

- Include the Local Centre at Holmpatrick Shopping Centre, Shenick Road, Skerries as a Level 5 centre in Table 6.1 Fingal Retail Hierarchy.
- Include the Local Centre at Skerries Point Shopping Centre, Skerries as a Level 5 centre in Table 6.1 Fingal Retail Hierarchy.

## CE CH 6.8

### Tourism Sector

Include additional text under Section 6.9 Tourism Sector after 5<sup>th</sup> paragraph as follows:

*Sustainable tourism planning requires a balance to be struck between the needs of the visitor, the place and the host community. Our landscapes, our cultural heritage, our environment and our linguistic heritage all have an intrinsic value which outweighs their value simply as a tourism asset. Sustainable tourism planning ensures that they can continue to be enjoyed and cherished by future generations. The Council will look favourably on sustainable tourism developments which are consistent with the proper planning and sustainable development of the County. Built development and other activities associated with tourism should in all respects be appropriate to the character of the place in which they are situated.*

## CE CH 6.9

Include new objective after ED55

Objective ED XX

*Promote and facilitate tourism as one of the key economic pillars of the County's economy and a major generator of employment and to support the provision of necessary significant increase in facilities such as hotels, aparthotels, tourist hostels, cafes and restaurants, visitor attractions, including those for children.*

## CE CH 6.10

Delete hotels from Not Permitted within the RW landuse zoning matrix, Chapter 11.

## CE CH 6.11

### Integrated Tourism Complexes:

Include additional text before Objective ED68:

*Hampton Demesne, which is located to the east of Balrothery contains Protected Structure Nos. 91 (former outbuildings of Hampton Hall) and No.92 (six-bay two-storey house, former home of Hamilton family) respectively. An Integrated Tourism/Leisure development at Hampton Demesne will be facilitated where the Hampton Hall, the associated buildings and attendant grounds are conserved and Protected Structures, special character and setting protected.*

*Beech Park House, located to the south-west of Clonsilla village contains the Protected Structure Nos.709 and 710 which comprise the 'former outbuildings of Beech Park house' and the 'house, lodge and gates'. Consideration will be given to a suitably scaled integrated tourism and recuperative centre at Beech Park House. The nature and extent of the facilities shall be determined primarily by the need to conserve the house, lodge and courtyard and their surroundings, which are of major architectural importance, and the special landscape character and heritage features of the land.'*

Abbeville

*The existing building complex is very extensive and accommodates a number of structures and attractive buildings in an extensive demesne type landscape. It is an exceptional site which, in the event of it no longer being suitable for residential use, could be reused to provide for future tourism,*

# PART TWO

---

*amenity and other recreational needs within the County. There is a need to examine options regarding the optimal re-use and refurbishment of the complex of buildings within the demesne setting, to ensure the future sustainable use of this important and unique resource.*

*The nature and extent of the facilities to be provided shall be determined primarily by the need to conserve the house and its surroundings, which are of major architectural importance, and the special landscape character and heritage features of the demesne.*

An integrated tourism and recreational complex is encouraged on Abbeyville Demesne. This shall incorporate facilities which may include: Hotel / Conference Centre, Golf Course, Fitness Centre and at least one other extensive tourist/recreational facility. A strictly limited number of dwelling units, grouped in a courtyard type configuration, *with the majority of the dwellings to be reserved for tourism use.* ~~which shall be reserved for tourism use.~~

## **CE CH 6.12**

New Objective CHXX:

Support, in accordance with CH21, the development of an integrated tourism and recreational complex on Abbeyville Demesne, incorporating facilities which may include: Hotel / Conference Centre, Golf Course, Fitness Centre and at least one other extensive tourist/recreational facility. A strictly limited number of dwelling units, grouped in a courtyard type configuration, the majority of which shall be reserved for tourism use may be considered. The nature and extent of the facilities to be provided shall be determined primarily by the need to conserve and rehabilitate the house and its surroundings, which are of major architectural importance, and the special landscape character and heritage features of the demesne

## **CE CH 6.13**

### **Location of Employment**

Include additional text in 2<sup>nd</sup> paragraph of Page 232, Chapter 6 under the heading 'Incubation Units, Workshops, Starter Units and Home Working', as follows:

*Co-working is a style of work that involves a shared working environment, often an office, and independent activity. Unlike in a typical office environment, those co-working are usually not employed by the same organisation. The concept of co-working is suitable for start-ups, entrepreneurs and freelancers. Opportunities exist where vacant/underused properties are available and can be used for co-working. The Council will support the concept of co-working, where appropriate.*

## **CE CH 6.14**

Insert additional text into Objective ED103:

Promote the provision of workspace units, *including co-working* for SMEs, start-up companies *and freelancers* in general and with particular emphasis on ensuring their provision within large schemes to offer opportunities associated with clustering and networking.

# PART TWO

## Chapter 7 Movement and Infrastructure

This Section of the report deals with issues concerning Movement and Infrastructure [Water, Climate Change, Energy Telecommunications and Waste Management]. Dublin Airport is addressed as a separate sub-theme following this.

### Submissions Received Relevant to this Chapter

D00002, D00052, D00058, D00131, D00186, D00187, D00189, D00193, D00213, D00228, D00232, D00233, D00234, D00235, D00236, D00248, D00275, D00305, D00327, D00331, D00335, D00338, D00403, D00419, D00437, D00439, D00448, D00450, D00472, D00473, D00476, D00491, D00497, D00505, D00510, D00514, D00515, D00523, D00529, D00531, D00534, D00535, D00540, D00543, D00544, D00549, D00551, D00564, D00566, D00568, D00576, D00577, D00578, D00579, D00580, D00581, D00583, D00584, D00600, D00609, D00616, D00617, D00620, D00621, D00634, D00636, D00639, D00643, D00662, D00720, D00727, D00734, D00751, D00752, D00768,

### Transportation

#### Issues Raised

##### Policy Context

The insertion of additional text in Section 7.1 of the Draft Plan, under '*2009-2020 Smarter Travel – A Sustainable Transport Future*' relating to sustainable transport and specific objectives relating to cycling listed under the '*National Cycle Policy Framework 2009-2020*' is proposed. Additional text is required under the paragraph summarising the '*NTA Greater Dublin Area Cycle Network Plan*' to refer to the '*National Cycle Network Scoping Study (2010)*' through a number of additional objectives. The wording of Objective MT01 shall promote sustainable modes of transport such as walking and cycling.

The TII submission notes the DOELG's Spatial Planning and National Roads Guidelines for Planning Authorities (2012) is made only in objective DMS 124 and DMS 108 and Appendix 5 and is absent from statutory guidance listed in the Chapter One, in Section 1.7 or associated Figure 1.2 and Chapter 7, Policy Context.

##### Parking Control

Amendments to the car parking standards relative to specific land uses within the zoning categories are proposed. A number of submissions request free parking in the smaller town centres throughout the County. Balbriggan is cited as an example of one such town centre where free parking should be available given the availability of free parking at Millfield Shopping Centre. The lack of public parking in Donabate Village results in cars parking in the Church carpark and in housing developments near the village. In this context, there is a need for paid or short-term parking to be introduced. Spaces allocated for Electric Vehicles should be for EV's only and those parking illegally in these spaces should be subject to clamping. Concerns are expressed regarding the shortage of parking within Higher Colleges of Education and schools across the County such as the Institute of Technology Blanchardstown, Rush and Lusk Educate Together School and St Patrick's School, Donabate where student numbers continue to grow. In this regard, additional parking is sought. An area for the parking of HGV's and multiple commercial vehicles is required for Rush.

##### Walking and Cycling

The submission from Codema welcomes the focus on walking, cycling and public transport within the Draft Plan and notes that the security and availability of adequate parking spaces for bicycles is a key factor influencing the number of cyclists in Dublin.

## PART TWO

---

The majority of submissions request the construction/upgrade of a large number of pedestrian and cycle paths within the County. The Draft Plan proposes a large network of cycle routes which is welcomed. However, a commitment by Fingal County Council for the completion of the majority of these routes within the lifetime of the Development Plan is required.

The following pedestrian/cycling infrastructure is proposed across the County:

Implementation of the New Metro North presents an opportunity to provide a new cycle and pedestrian crossing of the M50 parallel with and directly adjacent to the rail line, which would serve to provide more integration with this new high capacity public transport infrastructure and promote greater transfer to more sustainable transport modes. A new objective is proposed within the Draft Plan within this context.

The need for safe pedestrian crossings are highlighted in a number of locations across the County. Specifically, there is a need for a safer crossing at the entrance roundabout to Blanchardstown Institute of Technology (ITB) and the need for more cycle routes to adjacent housing estates from the ITB. A pedestrian crossing at the junction of Knockmaroon Hill, Knockmaroon Road, Tower Road and Lower Road to safely access the Phoenix Park is proposed.

A safe pedestrian / cycle route to be provided between Swords Castle Park along the north side of the Estuary to connect to the Broadmeadow Way.

Creation of safe cycling routes from Swords to Donabate and improve routes from Swords to the Airport and the R132 junction at Boroimhe and Airside.

Local Objective 41 of the Draft Plan which seeks to upgrade access from Ridgewood to the Rathingle Road should only be considered in the context of the reopening of the road between Highfield Estate and River Valley housing development.

A number of pedestrian / cycle routes are proposed in and around Lusk, including contraflow cycling on St Joseph's Avenue, a new route to Balleally Regional Park, Balleally to Blake's Cross, Blake's Cross to Turvey Avenue, Orlyn Park to Forge and Rathmount Road, upgrading of pedestrian and cycle routes between Lusk Village and the Lusk-Rush Railway Station and between the Town Park, Village Centre and Kilhedge Lane. New footpaths are required on the east side of Dun Emer Way, Lusk.

New footpaths and street lighting are proposed in a number of locations within Rush including Spout Road, Channel Road, South Shore Road and Rogerstown to improve pedestrian safety on all exiting access routes.

Pedestrian crossing points on Quay Street, Balbriggan and from the approved location of the children's playground in Mill Street Park to the public toilets and front beach in Balbriggan are proposed.

A pedestrian zone is proposed for Balbriggan town centre and the western harbour area.

Provide a looped walking and cycling route from Bremore Castle along the coast to Ardgillan Castle and Balrothery and returning to Balbriggan via the existing cycleway along the R132.

## PART TWO

---

Provide a continuous footpath from Quay Street to High Street, Balbriggan and improve access and connectivity along the beach from Black Rock to Balbriggan Harbour.

Public lighting of Bremore all-weather pitch.

Extend the footpath from Kelly's Bay to Barnageerah Cove in Skerries to provide connectivity to Skerries town centre.

Completion of the Balbriggan to Skerries Cycling and Walking Scheme originally funded by the NTA Smarter Travel Fund located along the Coast Road between Skerries and Balbriggan. A new objective for the completion of this route shall be included in the Draft Plan.

Improve pedestrian and cycle links along Raheny Lane and Rathmore Road to Rush and Lusk Educate Together National School, in the interests of pedestrian and cyclist safety.

A cycling route between Castleknock and the Royal Canal cycle route with a cyclist friendly bridge and access ramp is required to link the Navan Road Parkway and the Royal Canal cycle route. A pedestrian and cycle link is proposed between the Royal Canal and the River Liffey.

Remove the objective relating to the NTA's 'Dublin 15 Priority Cycle Route 5' and its replacement with an alternative cycle and pedestrian route through Castleknock College and into Castleknock Village to facilitate the development of an improved cycling route at this location.

Develop coastal routes with linkages to local town routes.

New footpaths required at Turvey Avenue and Hearse Road, Donabate. Improved access to Newbridge Demesne is also required with a detailed network of pedestrian and cycleways on Donabate Peninsula.

### **Public Transport**

A number of submissions note that public transport is limited in various locations across the County and requests improved local services, bus-only links feeder buses and new rail stations. Rural areas are particularly deficient in accessible public transport. There is a need for a fully integrated public transport service with improved linkages between the large towns within the County and to the City Centre. Failte Ireland requests the integration of the County's transport and tourism strategies to promote sustainable travel patterns and improved linkages between the City Centre, Villages and the Coast for visitors to the County.

Walking, cycling and public transport shall be prioritised in the Draft Plan. The Draft Plan shall also promote the extension of the DART to Balbriggan and public transport provision to commercial / industrial estates.

A number of submissions question the inclusion of Metro West within the Draft Plan and the inclusion of the indicative Metro West Corridor on the accompanying land use zoning maps given the project is no longer included within the *GDA Transport Strategy 2016-2035*.

The importance of Metro North to Swords and Fingal is highlighted. However, it is maintained that the emphasis placed on Metro North, particularly in the case of Lissenhall, is such that if economic or planning problems arise, this may affect the delivery of Metro North and the provision of housing could be seriously affected.

# PART TWO

---

The submission received from the Department of Housing, Planning, Community and Local Government supports and fully endorses the key strategic transport infrastructure proposal of Metro North which is in line with national transport policy.

Wording amendments are proposed to objectives MT01 and MT13 specifying commencement construction dates for Metro North.

A park and ride facility shall be provided at Lissenhall and on lands west of Dublin Airport.

The LUAS Cross-City Line as set out in the *GDA Transport Strategy 2016-2035* shall be referred to within the Draft Plan and Maps to ensure the sustainable and logical development of the LUAS Cross City Line from Broombridge to Finglas and to the Airport West Campus.

The submission received from Dublin Bus welcomes the appropriate and comprehensive measures directed towards the future provision of bus travel and are fully supportive of the measures to improve north / south connectivity between the communities separated by the Ward River Valley in Swords. The planned introduction of BRT in Blanchardstown and Swords will address the majority of capacity issues connecting the largest centres in Fingal with the City Centre.

The importance of Mobility Management Plans needs to be highlighted with specific objectives laid out for the implementation of these MMP's including detail on the 'particular places of work or education'.

## Roads

The increase in traffic volumes and traffic congestion on roads across the County has been raised in a number of submissions. There are a significant number of roads within the County that are in need of repair and upgrading. The issue of high traffic speeds within residential areas was also raised and the need for speed limits to be imposed.

The following traffic issues and road infrastructure provision were raised in the submissions: The TII note traffic congestion and the use of the private car are growing. The TII are aware that some of the M50 interchanges are operating in excess of capacity. This congestion is also experienced daily during the peaks on the M50 mainline. As an example, capacity issues on the M1 are occurring on the junction with the M50, Dublin Airport access and also interface with the Dublin Tunnel (i.e. access to Dublin Port). National roads are as critical enablers of our national economy and given this and the need to maintain their capacity and safety, TII recommend that an overarching policy be included in Chapter 7 acknowledging the importance of the national road network and associated junctions and the need to ensure the capacity and safety of national road network including its junctions are protected and maintained. The TII also note that no reference is made to the Trans-European Transport Networks (TEN-T) Regulation (EU) No 1315/2013 in the Draft Development Plan.

The TII note projects related to national roads are included and the TII acknowledges that it is beneficial to schedule other work programmes that the Council propose to deliver at a local level. However, Fingal County Council should be aware that the TII may not be responsible for the financing of these additional projects as these scheduled improvements are not a priority. However TII should be consulted and aspects agreed as projects proceed. TII notes Objective ED109 and is not aware of the policy referred to and would refer the planning authority to the DOELG's Spatial Planning and National Roads Guidelines for Planning Authorities (2012).

## PART TWO

---

Meath County Council requests a new objective be included in the Draft Plan to support the N2 upgrade and to indicate co-operation with the TII and Meath County Council to secure its delivery. It is also maintained that there is a need for wider co-operation between adjoining Local Authorities relating to the future delivery of road schemes including a possible road link between the M3 and M4.

A new objective is sought to be included in the Draft Plan to promote the implementation of road schemes within the vicinity of Dublin Airport with priority given to the Swords Western Bypass and Airport Box to Cherryhound. These schemes shall be implemented as a matter of priority and within the lifetime of the Development Plan 2017-2023.

Concerns are expressed regarding the excessive traffic on the Distributor Road in Swords (Bunbury), through associated noise and pollutants emanating from the large number of vehicles using this route. It was also noted that there is excessive traffic congestion from Brackenstown to the junction with the Dublin Road, in Swords. Concerns were also raised regarding traffic noise and pollution from industrial units and factories located at Harristown Lane in Swords.

The proposed East-West Road in South Fingal from Malahide to Cherryhound which is based on the South Fingal Transport Final Study fails to fully engage with the public transport needs of the area.

There is a need for the construction of Donabate Distributor Road and a realistic timeline is required for completion of this route.

It is maintained that the proposed Moyne Road Bypass would have a serious adverse impact on the open spaces lands of Portmarnock South and Racecourse Park lands in Baldoyle, visually severing these open space lands and generating additional noise. In this context, an upgrade of the existing Moyne Road is proposed. A full review of the proposal within the Draft Plan to upgrade the Moyne Road is requested and if deemed necessary, the alignment of this road shall be sited and designed so that it is located as far south as possible to ensure the protection of the residential amenity of future residents. Include Station Road, Portmarnock and Drumnigh Road junction within the list of Road Schemes at Table 7.1 of the Draft Plan.

The Draft Plan shall commit to providing solutions to ease traffic congestion at Sutton Cross.

Improve access to Balbriggan from the main North-South M1 Motorway, particularly to accommodate large vehicular traffic.

Widen the section of the Naul Road between the M1 and Stephenstown roundabout to include cycling lanes and widen Vauxhall Street, Balbriggan.

Realign the Balbriggan Ring Road.

Complete the Castlelands Link Road and the Skerries Link Road.

A Traffic management scheme is required for Balbriggan and a suggested one-way system proposed for Clonard Street, Chapel Street, Fulham Street, Railway Street, George's Street, Mull Street, Convent Lane, Quay Street, Hampton Street and Drogheda Street.

New development at Holmpatrick, Skerries will result in a traffic hazard when accessing the R128 Skerries to Rush Road.

# PART TWO

---

Re-align the Skerries Distributor Road.

Prioritise the construction of the Rush Relief Road to the west of Rush. The proposed East-West Road within the adopted Kenure LAP shall accommodate large vehicles, public lighting, footpaths, grass margins and cycle paths.

Improve access to Rush and Lusk Educate Together School due to the limited nature of Raheny Lane.

Upgrade the Malahide Road junction at Kinsaley and include in the list of road schemes at Table 7.1.

## **Local Area Plans and Masterplans**

TII request participation and consultation based on the preparation of Local Area Plans and Masterplans which may impact on the delivery and operation of a national road and light rail network.

TII note that a number of objectives in the Draft Plan associated production of non-statutory masterplans and would also note the provisions of both the Department of Housing, Planning Community and Local Government Local Area Plan Guidelines and Department of Housing, Planning Community and Local Government Sustainable Residential Development in Urban Areas Guidelines which advise that such plans can supplement or complement but not replace statutory plans.

TII raise concerns regarding the Masterplan process and notes the Spatial Planning and National Roads Guidelines require that development should be plan-led. The Department of Housing, Planning Community and Local Government Guidelines require that planning authorities must also ensure that they consult with the NRA (now TII) in preparing any local area plans or other non-statutory plans where there may be material implications for national roads. Therefore the TII consider this approach to be inappropriate for a number of proposed masterplans (list given). The TII note their concern regarding their involvement in the Masterplans and LAPs, including the Dublin Airport Central Masterplan, and the delivery of key strategic infrastructure.

The TII requests that this issue is addressed throughout the Draft Plan to address the deficiencies in consultation, liaison and evidence base requirements currently evident in draft development plan.

## **Chief Executives Response:**

### **Policy Context**

The background information contained within Section 7.1 of the Draft Plan is considered to be generally sufficient and summarises the national policy documents relevant to this chapter. These summaries are intended to provide a brief synopsis of the key National and Regional Policies and Plans which provide a context for the Council's Transportation Strategy. The DOELG's Spatial Planning and National Roads Guidelines for Planning Authorities (2012) will be included here and in Figure 1.2.

The Draft Development Plan is explicit in the promotion of sustainable modes of transport such as walking and cycling through Objectives MT09 – MT11.

# PART TWO

---

## **Parking Control**

Car parking standards in general will be reviewed and amended where necessary based on the needs of the area and the availability of public transport. The car parking standards deemed appropriate for specific uses within the land use zoning categories are addressed within Chapter 12 –Table 12.8 of the Draft Plan. These standards have been examined as part of the review of the current FDP 2011-2017. Parking provision is addressed through a combination of Traffic Management Schemes which are subject to a public consultation process and the Development Management Process.

The issue of parking charges and free parking is an operational matter and is outside the scope of the Development Plan. This is a separate process which is subject to public consultation.

Urban Framework Plans and Local Area Plans scheduled for preparation within the lifetime of the Development Plan will address local traffic management issues including car parking, pedestrian safety, streetscape, public realm, etc. Chapter 4 of the Draft Plan contains more detail in this regard.

The car parking standards set out in Chapter 12 - Table 12.8 of the Draft Plan requires one space or more per 100 spaces be reserved for electric vehicles with charging facilities. Objective MT07 of the Draft Plan supports the growth of Electric Vehicles and EBikes, with support facilities, through a roll-out of additional electric charging points in collaboration with relevant agencies at appropriate locations. The Council can require that spaces be delineated for the use of electric vehicles (in a similar way that parking spaces can be reserved for wheelchair users). Clamping regulation and operation is outside the remit of the Council and the scope of this Draft Plan.

It is acknowledged that over the past 20 years there has been a change in modal split from walking and cycling to car based transport at first, second and third level education. Following a review of the car parking standards, the Transportation Section of the Council proposes an increase from 5 no. spaces per lecture theatre to 10 no. spaces for Colleges of Higher Education and parking allowances for offices and labs / workshops on campus be calculated separately.

To improve access to Rush and Lusk Educate Together National School, road widening works and pedestrian footpaths on Raheny Lane have been permitted by Fingal County Council as part of Pl. Ref: F15A/0480. Parking/circulation issues within Rush Lusk ETNS complex will be further dealt with as part of a future planning application and will include proposals to revise internal circulation space and set down and parking areas. The Department of Education and Skills and the Council are currently in consultation on this matter.

The Council acknowledges the ongoing traffic management issues relating to the drop off and collection of pupils at St Patrick's National Schools on the Portrane Road. One submission was received in relation to Sheet 7 (Donabate-Portrane) requesting the rezoning of lands adjacent to the schools, to provide a dedicated set down area. The submission requested the rezoning of two portions of 'HA' lands to 'CI' (Community Infrastructure) and 'RS' (Residential). It is recommended that the lands separating the existing 'CI' zoned lands from the Portrane Road be rezoned to 'CI', to enable the development of a suitable safe set down area adjacent to the school. It is also recommended that a new map-based Local Objective be attached to these lands to provide access for a school set down area (refer to Sheet 7 response for more detail).

Objective Rush 3 of the Draft Plan seeks the preparation of an Urban Framework Plan to guide and inform future development including permeability and accessibility within the town centre

# PART TWO

---

of Rush. The provision of a parking area for HGV's and multiple commercial vehicles for Rush can be examined within the context of this future framework plan for the town.

## Roads

Traffic volumes and congestions are monitored regularly by the Council. Road improvements, upgrades, realignments, repairs, traffic management measures, traffic calming and improvements to road signage will be assessed and implemented as deemed necessary and as resources allow, in accordance with the Council's Capital Programme and Development Contribution Scheme. The upgrade and development of the County's national, regional and local road infrastructure is explicit within the Draft Plan at Chapter 7.

The Council will facilitate the protection of all National Routes from frontage access and to minimize the number of junctions in accordance with Transport Infrastructure Ireland's Policy and the Department of Housing, Planning Community and Local Government's 'Spatial Planning and National Roads Guidelines for Planning Authorities' (2012). There are several European, national and regional policy documents that will guide the development of (and development along) the strategic road network, such as the Trans-European Transport Networks (TEN-T) Regulations, Transport Strategy 2016-2035 for the Greater Dublin Area and the Spatial Planning and National Roads: Guidelines for Planning Authorities 2012. The Draft Plan takes cognisance of these documents, and references are made to these documents where relevant. It should be noted that specific details contained within these documents are not repeated in the Draft Plan to avoid repetition. Accordingly a new objective shall be included in Section 7.1, subsection Roads, to reflect this.

The Council acknowledge the TII may not responsible for the financing of additional projects.

It is recommended Objective ED109 is reworded to reflect the relevant guidelines.

The Draft Plan supports and facilitates Traffic Calming for new and existing residential developments. New residential developments shall be designed to create low-speed environments by the use of engineering design and urban design in accordance with DMURS.

Objective MT24 specifically seeks to implement traffic calming on particular roads and in appropriate areas of the County, especially residential areas, to reduce vehicle speeds in the interests of road safety and residential amenity. This objective seeks to ensure that where appropriate, traffic calming is included as a pre-condition as part of the development of all new estates or extensions to existing estates.

Traffic calming is a matter best dealt by an appropriate housing layout. The provision of traffic calming measures in new developments is conditioned where required, through the Development Management process.

The setting of speed limits and controls is outside the remit of the Development Plan and therefore outside the scope of this Draft Plan. This requires a separate statutory process including public consultation.

Table 7.1 of the Draft Plan contains a list of the Road Improvement Schemes for the County. Objective MT28 seeks to implement these road improvement schemes within the Plan period where resources permit and protect future road corridors from development. A number of the road improvements required and highlighted in submissions received are included within Table

## PART TWO

---

7.1. It should be noted that the road alignments illustrated on Development Plan maps are indicative only and will be subject to public consultation at a more detailed design stage.

The Council recognises the importance of strategic infrastructure such as the N2 upgrade and the N3/M3 routes in the Draft Plan and seeks to liaise and consult with adjoining Local Authorities on such infrastructural projects. Chapter 6 Economic Development of the Draft Plan includes specific reference to the importance of the N2 Route to the County.

There are a number of primary infrastructural assets associated with Fingal that are also of regional and indeed national importance. These are located within and/ or traverse the County, and include Dublin Airport; the motorway networks of the M50, M1 (which also provides access to Dublin Port via the Port Tunnel), N2/ M2 and N3/ M3; and the rail links of the Dublin-Belfast inter-city route, the DART and suburban rail service.'

A number of key objectives promote and facilitate the delivery of strategic infrastructure in consultation with adjoining Local Authorities within the Draft Plan.

### *Objective MT29*

*Utilise, where appropriate, the provisions of Section 48 and 49 of the Planning and Development Act, 2000 (as amended) to generate financial contributions towards the capital costs of providing local and strategic transport infrastructure, services or projects in the County. This will be done in conjunction with adjoining Local Authorities where appropriate.'*

### *Objective ED13*

*Engage and collaborate with adjoining local authorities and regional assemblies, as appropriate, to promote the continued economic development of the Dublin-Belfast Economic Corridor.'*

It is recommended that a new objective be included in the Draft Plan after Table 7.1 to support and facilitate the TII, Meath County Council and Kildare County Council in the planning and delivery of the N2 Upgrade north of Ashbourne and a possible link between the M3 and M4.

The Swords Masterplan has identified transport infrastructure to address the problems of traffic congestion in Swords and the principle road infrastructure to address such traffic issues are included within Table 7.1 'Road Improvement Schemes' and listed within a number of objectives in Chapter 4 of the Draft Plan. Objective SWORDS 6 promotes and facilitates the 'Highfield Link Road'. This link road shall also be included within the Road Improvement Schemes outlined in Table 7.1. The Swords Masterplan examined whether motorised traffic should be allowed on the Ward River Valley Crossing and the analysis concluded that there was insufficient demand. The Transportation Section of the Council reports that the re-opening of the road link between Highfield Green and Hilltown would be contrary to DMURS (Design Manual for Urban Roads and Streets) Guidance and Council policy.

The Draft Plan supports and facilitates the construction of the Swords Western Relief Road through Objective SWORDS 13 and Table 7.1 of the Draft Plan. Road infrastructure necessary to facilitate the development of the Airport lands to Cherryhound is promoted within Objectives ED30, DA24 and DA25 of the Draft Plan and specifically within Table 7.1. The St. Margaret's Bypass to the Northern parallel road is included in the Road Schemes set out in Table 7.1. The Dublin Airport Local Area Plan is currently in preparation. A Traffic Impact Assessment is being conducted as part of this LAP and the findings will inform the LAP with regards to the roads infrastructure necessary to facilitate the development of the Airport lands.

## PART TWO

---

The planning and detailed design stages of the proposed R107 Malahide Road Realignment, Balgriffin Bypass and the East West Distributor Roads: Malahide to Stockhole Lane and Stockhole to Cherryhound road schemes included in Table 7.1 of the Draft Plan will investigate the requirement for public transport.

The R126 Donabate Relief Road is included in the Road Schemes within Table 7.1 of the Draft Plan. Objective DONABATE 1 of the Draft Plan seeks to prioritise the early construction of the Donabate Distributor road, delivering a new railway crossing, providing alternative access to Donabate and Portrane. Fingal's Capital Programme for the period 2016-2018 provides for the construction of the distributor road. A single carriageway road between Hearse Road and the Portrane Road will be constructed with the provision of a second carriageway to coincide with the completion of the latter phases of proposed housing development. This arrangement is indicated in Figure 9.1 of the adopted Donabate LAP March 2016 and Section 9 of the adopted Plan sets out the detailed phasing arrangements. This distributor road is also included within the NTA's *Draft Transport Strategy for the Greater Dublin Area (2016-2035)*. The Donabate Distributor Road and the internal road infrastructure will be delivered by a collaboration of both the Council and the developer as part of the planning approval.

A key part of the preparation of the two Local Area Plans at Portmarnock South [adopted July 2013] and Baldoyle-Stapolin [adopted May 2013] was the assessment of the potential increase in the population of the area and the associated impact on traffic on the surrounding road network. The recommendations of both the South Fingal Transport Study: Final Report, May 2012 and Traffic Impact Assessment [TIA] informed the phasing arrangements for roads infrastructure at a strategic and localised level to facilitate the development of both these plan lands.

This TIA included a detailed examination of the Moyne Road. A fundamental finding of the TIA is that the existing Moyne Road underpass below the railway bridge operates satisfactorily as a shuttle system with good inter-visibility between the yield lines and is capable of accommodating development within the plan lands. It is acknowledged that due to the slow pace of development, this road has not been constructed to date. However, it is considered that the proposed benefit of the route in terms of reducing flood risk and ensuring a safer route for all is an important future development strategy for the area and accordingly the road proposal should be retained.

The TIA and subsequent phasing arrangements set out in Section 11 of the adopted Portmarnock South LAP makes provision for the upgrade of both Station Road, Portmarnock and Drumnigh Road junction. These road improvements are deemed necessary to provide increased capacity across the Dublin-Belfast Railway in the context of the development of the Portmarnock South and Baldoyle -Stapolin Local Area Plan lands and shall be included in Table 7.1 Road Schemes of the Draft Plan.

Improvements to Sutton Cross which includes road widening and a new median to alleviate traffic congestion has been permitted as part of the planning permission granted by Fingal County Council for the redevelopment of the existing Sutton Supervalu Store under PI. Ref: F15A/0195. This application is currently under consideration by An Bord Pleanala under PL06F.246628.

The list of road schemes for this plan period at Table 7.1 includes a comprehensive number of road schemes for Balbriggan and includes the Balbriggan Ring Road R122 to R132 via Flemington, the R122 Naul Road upgrade, the Stephentown Link Road, the Castlelands Link to

## PART TWO

---

the R127 and the R127 Upgrade at Barnagerragh. These road schemes will address road infrastructural deficiencies in and around the town of Balbriggan. These roads will be subject to detailed design and a public consultation process.

The alignment of the Balbriggan Ring Road is indicative only and will be subject to detailed design through the Development Management Process. This road is intended to be a boulevard type road, which would have high capacity for vehicular traffic, but would be low speed and minimise severance through design compatible with DMURS. The Transportation Department reports that the proposed realignment of the Balbriggan Ring Road would include a right-angle bend at Flemington Lane, which would not be acceptable.

Any proposed one-way street arrangements will be examined in detail as part of Masterplans, Urban Framework Plans, Local Area Plans (as detailed in Chapter 4 of the Draft Plan) scheduled for preparation. Traffic Management Plans will be prepared as part of Urban Framework Plans scheduled for preparation during the lifetime of the Development Plan and these will look at local road issues in detail.

The route of the Skerries Distributor Road identified on the Development Plan Map is indicative only and will be subject to detailed design and public consultation process inviting submissions from relevant stakeholders and interested parties.

The Holmpatrick Masterplan (August 2013) was prepared on foot of Local Objective 104 of the Fingal Development Plan 2011-2017 and provides indicative guidance for a mix of uses [Hotel, Swimming Pool, Playing Pitches and Residential development] on the Holmpatrick lands with full details to be determined by a planning application. This Masterplan includes the requirement for a signalised junction onto the R128 Skerries to Rush Road in the interests of traffic safety. There is a current planning application under Pl. Ref: F16A/0085 on the Holmpatrick lands for a mixed use development comprising a hotel, swimming pool and residential development. This application includes provision for a signalised junction onto the R128 and is currently under consideration.

The Rush Relief Road to the west of Rush is included within the list of Roads Scheme in Table 7.1. within Chapter 7. Local Objective 21 of the Draft Plan seeks to carry out an assessment of the traffic needs to inform the feasibility of providing a Distributor Road to the west of Rush. The proposed east-west link road within the adopted Kenure Local Area Plan will be subject to detailed design and will achieve the required road design standards and widths to cater for residential traffic and service vehicles. The detailed design stage shall include provision for pedestrian and cycle traffic, public lighting and soft landscaping.

To improve access to Rush and Lusk Educate Together National School, road widening works and pedestrian footpaths on Raheny Lane have been permitted by Fingal County Council as part of Pl. Ref: F15A/0480. Further improved access to the Rush and Lusk Educate Together Schools Complex will be dealt with as part of a future planning application and will include proposals to re-organise internal circulation space and set down and parking areas within the overall schools complex. The Council and the Department of Education and Skills are currently in consultation on this matter.

The Draft Development Plan includes the realignment of the R107 Malahide Road Realignment, which will resolve the problem of traffic congestion at the Chapel Road junction in Kinsaley in the medium to long term. A Traffic Impact Assessment [TIA] will be done as part of the future Local

## PART TWO

---

Area Plan for Kinsaley village and this issue will be addressed within the context of this TIA and the overall plan for the village.

### **Walking and Cycling**

The promotion of walking cycling as an efficient, healthy and environmentally friendly sustainable mode of transport is explicit in the Draft Plan. The Council promotes and facilitates the development of a safe and convenient network of walking and cycling routes through Objective MT09 of the Draft Plan.

The objectives of the *National Cycle Policy Framework (NCPF) (2009)* and the NTA's *Greater Dublin Area Cycle Network Plan* are incorporated into the Draft Plan and are promoted in Objective MT09. The Council will work in cooperation with the NTA to implement the *Greater Dublin Area Cycle Network Plan* subject to detailed engineering design and the mitigation measures presented in the SEA and Natura Impact Statement accompanying the NTA Plan.

The Council will continue to promote walking and cycling through the provision, upgrading and maintenance of cycleways and footpaths as resources allow; and ensure that connectivity is provided in new developments with the provision of good pedestrian and cycle network and facilities. Design standards will ensure that new residential and commercial proposals will adequately accommodate safe and secure bicycle parking, particularly at stations and other public transport interchanges. Bicycle standards are set out in Table 12.9 of Chapter 12 Development Management Standards of the Draft Plan and will be implemented through the Development Management Process.

The Council's Operations Department is responsible for the provision of footpath improvements, pedestrian crossings and public lighting throughout the County. Such works are delivered within the context of the Council's Programme of Works. Public lighting of large recreational facilities such as the state of the art all weather pitches at Bremore Regional Park in Balbriggan has been delivered as a collaboration between the Council's Parks and Operations Department.

The provision of pedestrian infrastructure on the M50 is outside the remit of the Council and is the responsibility of Transport Infrastructure Ireland [TII]. The permitted design of Metro North does not include a pedestrian facility on its bridge over the M50. A future revised design of Metro North may consider providing a pedestrian facility and this is a matter for TII.

The Draft Plan promotes the development of new pedestrian/cycle routes though a number of strategic objectives for each of the settlements outlined in Chapter 4. Objective Blanchardstown 8 promotes the pedestrian, cycle and vehicular integration of Blanchardstown Village with the Town Centre. Objective Swords 11 promotes a comprehensive network of pedestrian and cycleways, linking housing to commercial areas to the town centre and to future planned infrastructure such as the Metro. Objective Lusk 9 seeks the creation of pedestrian/cycle links between Lusk and Balleally and Lusk Railway Station, Objective Rush 3 seeks the preparation of an Urban Design Framework Plan to improve permeability and connectivity within the town. Objective Balbriggan 11 seeks to ensure a safe and convenient road, pedestrian and cycle system promoting permeability, accessibility and connectivity between existing and new developments within the town and Objective Skerries 10 promotes a safe and convenient road, pedestrian and cycle system highlighting accessibility and connectivity both within and between the town and the surrounding towns and villages.

Proposals for improved connectivity and permeability through a network of convenient and safe walking and cycling routes including pedestrian zones will be examined within the context of the

## PART TWO

---

various Local Area Plans, Masterplans, Urban Framework Plans and Public Realm Plans proposed in the Draft Plan for these areas. The Development Management Process and Capital Works Programme will also facilitate the development of pedestrian and cycling infrastructure.

The proposed Balbriggan to Skerries walking and cycling Scheme along the Coast Road will form part of the strategic Fingal Coastal Way. In this regard, this scheme remains a priority for the Council and it is recommended that a new objective be included within Chapter 4 of the Draft Plan to promote and facilitate the development of this pedestrian/cycling scheme within the lifetime of this Development Plan.

To improve access to Rush and Lusk Educate Together National School, road widening works and pedestrian footpaths on Raheny Lane have been permitted by Fingal County Council as part of Pl. Ref: F15A/0480. Parking/circulation issues within Rush Lusk ETNS complex will be further dealt with as part of a future planning application and will include proposals to revise internal circulation space and set down and parking areas. Rathmore Road provides a high standard of pedestrian and cycle paths.

A cycle route from Castleknock to the Royal Canal is included as a secondary route within the NTA cycle network and will be subject to public consultation and detailed design. Objective 151 of the Draft Plan promotes a strategic pedestrian and cycling link across the River Liffey. A connection from Castleknock to the Liffey could be examined within the public consultation and design stage of this strategic link.

The Council's Transportation Section reports that a realignment of the NTA's Cycle Route 5 to Castleknock College would be disruptive for commuter cycle traffic from Diswellstown/Carpenterstown to Dublin, using White's Road to access the Phoenix Park. In this context, the map based local objective relating to the NTA's 'Dublin 15 Priority Cycle Route 5' for the Greater Dublin Area to remain to facilitate a direct route to the City Centre.

Objective ED64 of the Draft Plan promotes and facilitates a co-ordinated network of walking trails in the County through the development of a Recreational Trails Plan within the lifetime of this Draft Plan. The development of the recreational trails network within the County is proposed at three levels; i) the strategic level [eg.Fingal Coastal Way, the Liffey Valley area, and the Royal Canal Greenway], ii) town trails including Slí na Sláinte and iii) village trails. It is envisaged that future localised town trails such as Balbriggan and Balrothery, Lusk and Rush as well as other town trails along the coast will link to the strategic greenway of the Fingal Coastal Way. This plan will involve a public consultation process with submissions invited from relevant stakeholders and interested parties regarding future trails development.

A long standing objective of the Fingal Development Plan is the development of the 'Fingal Coastal Way', a strategic greenway for pedestrians and cyclists along the coastal corridor from Howth to Balbriggan. Objectives ED61 and NH61 of the Draft Plan and the Fingal Tourism Strategy 2015-2018 promotes and facilitates the development of the Fingal Coastal Way. The Council is currently moving ahead with the planning and environmental assessments required for the most critical link of the coastal way across the Malahide viaduct linking Malahide Demesne to Newbridge Demesne - The Broadmeadow Way.

Other trails projects ongoing by Fingal County Council include the Royal Canal Greenway and the Swords and Rush Heritage Trails and a pedestrian trail from Rush to Balleally Regional Park via Rogerstown Estuary. The Swords to Sutton Scheme is currently in planning design stage and will link Sutton to the town centre of Swords via a high standard cycling route. This will include

## PART TWO

---

provision for pedestrians. The proposed Balbriggan to Skerries walking and cycling Scheme and the Swords to Sutton Cycling Scheme will form part of the proposed strategic greenway along the coast.

Objective Donabate 4 of the Draft Plan supports and facilitates the development of a continuous network of signed pathways and cycleways as appropriate, around the Donabate Peninsula. Objective Donabate 16 seeks the provision of a pedestrian path and cycle lane as appropriate on the Hearse Road to enable safe access to Donabate village.

A key feature of the development strategy of the Donabate LAP (March 2016) is the delivery of inter-connecting pedestrian and cycle routes on the Peninsula. The proposed Recreational Trails Plan in conjunction with the adopted Donabate LAP and the Broadmeadow Way Project will facilitate the development of pedestrian/cycle linkages within the Donabate peninsula to Newbridge Demesne, Donabate and Malahide.

It is an objective of the Donabate LAP to improve access to Newbridge Demesne and to implement the Turvey / Newbridge Loop – a pedestrian and cycle route which links Turvey Nature Reserve to Newbridge Demesne, the Broadmeadow Way and Donabate Village via the new and existing developments areas at Turvey and Corballis. Objective 3.6 of the adopted Donabate LAP seeks to:

*'Ensure the construction of the following cycleway/footpath improvements in tandem with development:*

- *Link path/route from Newbridge Demesne to Donabate Village via the Corballis LAP lands;*
- *Link path/route from Rahillion LAP Lands south to St Patrick's Boys and Girls National Schools; and*
- *Provide a pedestrian/cycle link from Newbridge Demesne to lands at Turvey.'*

The objectives contained within the Draft Plan and the adopted Donabate LAP fully support the provision of a network of key cycle and pedestrian routes throughout the Donabate Peninsula.

Following on from the adoption of the Donabate LAP, the Council will prepare an Action Plan in the coming months to resolve identified constraints and ensure that the necessary funding and resources are identified to deliver critical pedestrian/cycle infrastructure in the area. The Action Plan will include a full Traffic Assessment and will examine the delivery of a pedestrian crossing from Newbridge Demesne to Beresford Estate / Turvey Avenue and footpath provision along Turvey Avenue and Hearse Road.

### **Public Transport**

The Draft Development Plan promotes and facilitates the necessary policy framework to encourage and facilitate the improvement of public transport across the County with linkages to the City Centre. The Draft Plan provides for an integrated approach to land use and ground transportation, aimed at securing a modal shift to more sustainable modes of transport, i.e. cycling, walking and public transport [local bus, train, Dart, Metro]. This includes promoting land use patterns which reduce the need to travel and support public transport provision including, where appropriate, higher densities at public transport corridors and nodes. This benefits public transport by providing sufficient numbers of customers within its catchment to sustain the high costs of public transport infrastructure and services. Objective MT16 of the Draft Plan facilitates and encourages high quality interchange facilities at public transport nodes throughout the County. The tourism sector within the County will significantly benefit from the integration of land use and transportation as advocated in the Draft Plan.

## PART TWO

---

The promotion of walking cycling as an efficient, healthy and environmentally friendly sustainable mode of transport is explicit in the Draft Plan. The Council promotes and facilitates the development of a safe and convenient network of walking and cycling routes through Objective MT09 of the Draft Plan. Objective RF65 of the Draft Plan supports the Rural Transport Initiative and the provision of an integrated rural community public transport system as a means of reducing social isolation and as a viable long term sustainable public transport option.

The Council while not a direct public transport provider will liaise with bodies such as the NTA and public transport service providers in the development of improved public transport infrastructure for the County and identify and protect future transport route corridors. Objective MT18 supports Iarnród Éireann in implementing the Dart Expansion Programme, including the extension of the Dart line to Balbriggan. MT 13 supports the development of Metro North while MT21 supports the NTA in the implementation of Bus Rapid Transit from Blanchardstown to Belfield and from Swords to Merrion Square.

The *GDA Transport Strategy for 2016-2035* April 2016 was issued following the publication of the Draft Development Plan. While Metro West is no longer included as a public transport project in the Plan, it is considered prudent to keep the reservation for some form of high capacity public transport (if not metro, then Bus Rapid Transit).

The Draft Plan promotes and facilitates the development of the strategic infrastructure of Metro North through objectives MT13 and MT14. The delivery and timeline for the Metro North project is outside the remit of the Council and therefore outside the scope of this Draft Plan. TII is the lead body in terms of its overall delivery.

The Regional Planning Guidelines set out housing targets for Fingal and these targets are detailed in Fingal's Core Strategy, which is set out in Chapter 2 of the Draft Plan. The Core Strategy in the Draft Plan elaborates on phasing, prioritisation and infrastructure delivery and identifies the primary growth nodes which will provide a significant portion of the supply of residential units up to 2023. The emphasis of this Draft Plan is to continue to consolidate the existing centres in the Metropolitan Area of the County and to maximise the efficient use of existing and planned infrastructure. The lands at Lissenhall are zoned in anticipation of the development of Metro North and are intended to be developed in the longer term – i.e. over the period of several Development Plans (20-25 years). By identifying Lissenhall as a key future development area, the Council is seeking to maximise the opportunities created by the delivery of this key piece of strategic infrastructure in accordance with best planning practice and the principles of sustainable development.

Objective MT23 promotes and facilitates the provision of Park and Ride facilities at suitable locations near high capacity public transport stations/stops. The Council will consider the provision of park and ride facilities at appropriate locations within the County in conjunction with the NTA and relevant public transport providers. Park and Ride facilities are permitted in principle within a number of land use zoning objectives, including the lands around the Airport. A Park and Ride facility is envisaged in the vicinity of the proposed Metro North stop at Lissenhall. Local feeder buses are promoted within various towns across the County in the Draft Plan. Objective Rush 8 promotes and facilitates the operation of a feeder bus service to the Lusk-Rush Railway Station.

There are currently no proposals at national level to develop a LUAS line into Fingal. The strategic importance of the LUAS Cross-City Line which is a key element of the Transport Strategy for the

# PART TWO

---

Greater Dublin Area for 2016-2035 is accepted. Objective MT12 of the Draft Plan supports the NTA and TII in the planning and implementation of strategic public transport infrastructure.

The Draft Plan prioritises public transport by safeguarding future rail and bus routes, promoting the provision and improvements of QBC's, BRTs and bus priority measures.

Objective DMS115 of the Draft Plan requires that all new developments with over 100 employees and all new schools shall have a Management Mobility Plan [MMP]. The MMP set out measures which promote sustainable transport for particular places of work or education and these measures are outlined in Chapter 7, Section 7.1 Management Mobility Plan of the Draft Plan.

## **Local Area Plans and Masterplans**

The existing Fingal Development Plan outlines a range of planning documents for different areas. These include Local Area Plans, Urban Centre Strategies, Urban Centre Studies, Masterplans, Landscape Masterplans, Recreational Strategies, Gateway Strategies, Management Plans and Feasibility Studies. The Draft Fingal Development Plan proposes to rationalize and make consistent the type of planning documents which will be produced in the future.

The Draft Plan gives a statutory framework to all proposed plans and strategies through a number of objectives. These objectives give the proposed plans and strategies the necessary statutory context. Objectives PM08, 09, 10, 14, 15 & ED84, 85, 86, 88, 93, 94, 97 & 100)

The decision as to whether to prepare a local area plan in a sub-threshold context or include specific objectives in a development plan is a matter for the planning authority. However, such a decision would normally take on board criteria such as the degree to which major development is anticipated such as to justify the preparation of a standalone local area plan, the resource implications and the need to focus resources in using the local area plan process for areas where major alterations to the built environment are anticipated.

Masterplans will be prepared by the Council to give guidance on specific development proposals working within the relevant development plan or local area plan parameters. As long as such documents work within defined policy and objective parameters of the relevant plan and do not set new policies or objectives outside the statutory process for defining such content, their usage is both appropriate and complementary to the Development Plan.

From the non-statutory background data gathering process to the statutory process as set out in the legislation with its various elements of statutory notices, issues papers, draft, amended draft and final documents, the preparation of a Local Plan is an extremely resource intensive process on the Planning Department. Within this context, and having regard to the discretion available to the Planning Authority in deciding on the appropriateness of applying the requirement for a Local Area Plan or a Masterplan, the Draft Plan has sought the requirement for a Masterplan on certain lands where it is considered that the same vision and objectives can be achieved in a more efficient and expedient manner than applying the formal Local Area Plan process.

The preparation of Masterplans will assist in achieving quality developments in terms of, inter alia, urban design, structure, delivery of infrastructure and community/amenity facilities and permeability. The Draft Fingal Development Plan identifies key sites that will require the preparation of approved Masterplans and subsequent planning applications will be required to adhere to the approved Masterplans. Masterplans will be subject to a public consultation process and engagement with the relevant stakeholders, including the TII and the NTA. The

# PART TWO

Planning Authority considers Masterplans as an effective means of guiding new development and providing essential social and infrastructure in a phased and sustainable manner.

In the context of NTA and TII concerns and to ensure a robust assessment of implications of such plans on strategic infrastructure, it is considered appropriate to include an objective to prepare a study for the South Fingal area.

## **Recommendation:**

### **Policy Context**

#### **CE CH 7.1**

Amend Section 7.1, subsection Policy Context to include:

#### ***Spatial Planning and National Roads Guidelines for Planning Authorities***

*These guidelines set out planning policy considerations relating to development affecting national primary and secondary roads, including motorways and associated junctions, outside the 50-60 kmph speed limit zones for cities, towns and villages. These guidelines have been developed by following a number of key principles and aim to facilitate a consistent approach that affords maximum support for the goals of achieving and maintaining a safe and efficient network of national roads, thereby facilitating continued economic growth and development.*

#### **CE CH 7.2**

Amend figure 1.7 to include reference to Spatial Planning and National Roads Guidelines for Planning Authorities

### **Parking Control**

#### **CE CH 7.3**

Amend Table 12.8 Car Parking Standards within Section 12.10 of Chapter 12 Development Management Standards as follows: College of Higher Education increase 5 no. spaces to 10 no. spaces per lecture theatre.

\*Insert the following as a footnote: Parking allowances for offices and labs / workshops on a Higher Education College Campus to be calculated separately in accordance with required car parking standards.

### **Roads**

#### **CE CH 7.4**

Insert new objective:

*MT 24*

*Maintain and protect the safety, capacity and efficiency of National roads and associated junctions in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities, DECLG, (2012), the Trans-European Networks (TEN-T) Regulations and with the regard to other policy documents, as required.*

#### **CE CH 7.5**

Amend Objective ED109:

Encourage developments which are likely to generate significant levels of freight traffic to locate close to the existing County or national road network having regard to ~~TII policy~~ the DOELG's *Spatial Planning and National Roads Guidelines for Planning Authorities (2012)*.

#### **CE CH 7.6**

Include the 'Highfield Link Road' within Table 7.1 'Road Improvement Schemes'.

# PART TWO

---

## **CE CH 7.7**

Include Station Road, Portmarnock and Drumnigh Road Junction in Table 7.1

## **CE CH 7.8**

Include the following objective after Table 7.1:

*Objective xx 'Support and facilitate the TII, Meath County Council and Kildare County Council in the planning and delivery of the N2 Upgrade north of Ashbourne and a possible link between the M3 and M4.'*

## **CE CH 7.9**

### **Walking and Cycling**

Include the following development objective within Chapter 4 relating to Skerries:

*Objective Skerries XX 'Promote and facilitate the development of the Balbriggan to Skerries cycling/walking Scheme along the Coast Road within the lifetime of this Development Plan.'*

## **Local Area Plans and Masterplans**

### **CE CH 7.10**

Include a new objective after MT02 (see appendices)

*Carry out a comprehensive feasibility study of the South Fingal area to advise on a strategic 'vision' and overall strategy for the proper planning and sustainable development of the study area. This will be carried out in consultation with necessary statutory agencies and relevant stakeholders.*

Insert Study Area boundary on Sheet 11.

# PART TWO

---

## Water Services

### Issues Raised

The submission received from Irish Water welcomes Objective DW001 which recognises the need to develop and identify an additional sustainable water supply source serving the Eastern and Midlands Region and the promotion of water conservation. This submission also welcomes the recognition in the Draft Plan of the Greater Dublin Drainage Project, which includes a new treatment plant at Clonsaugh. Irish Water also recommends minor wording amendments to Objectives WT03 (wastewater treatment plants and networks), WT05 (temporary wastewater treatment facilities) and WT12 (buffer zones around pumping stations)

It was noted in one submission that several large developments discharge surface / foul water into the Brook Stream in Rush, which has contributed to flooding in this area. It was also noted that there is a need to manage the sewerage situation in Rush with the need for a new system for the area.

One submission highlights the need for the width and depth of the channel in Old Portmarnock to be increased to accommodate higher flows from Kinsealy, Baskin and Cloghran. The culvert under Portmarnock Raceway and the bridge crossing on the Drumnigh Road need to be increased in size to accommodate the higher flows and prevent flooding. The width and depth of the channel running up through Kinsealy and Abbeville needs to be increased to accommodate the runoff from the new Dublin Airport facilities and prevent flooding at the junction of Drumnigh Road and Chapel Lane.

Another submission received notes that serious attention needs to be paid to Howth's unique drainage problems and this should be examined in every planning application lodged for projects in the Howth Peninsula. There is concern with further flooding in the Howth area.

One submission received requested the insertion of the following text to Objective SW01, to read as: *'...Ensure that development does not impact on important wetland sites within river / stream catchments.'*

### Chief Executive Response

It is important to note that since the adoption of the current Development Plan (2011-2017), the water sector in Ireland has undergone major transformation and reform. As of January 2014 Irish Water replaces local authorities as a single provider of water and waste water services and it is responsible for the operation of public water services including management of national water assets, maintenance of the system, investment, planning and management of capital projects.

As such the Council has and will continue to work closely with Irish Water to inform and influence the timely provision of infrastructure within the County in line with Fingal's Settlement Strategy. The Council is responsible for the management of surface water at a local level and the Office of Public Works (OPW) has responsibility for flood risk management at a strategic level.

The submission received from Irish Water is welcomed and it is recommended that their suggested wording amendments to Objectives WT03, WT04 and WT12 be updated accordingly. It is recommended that the wording of Objective WT12 be slightly modified to ensure that an adequate buffer zone is maintained from the noise / odour producing part of the pumping station.

## PART TWO

---

Submissions received referring to flooding in specific areas including Howth, Rush and Portmarnock are noted, as are submissions requesting that drainage channels be increased in size to accommodate higher flows from Kinsealy, Baskin, Portmarnock, Cloghran and Dublin Airport. All future development will be constrained to drain at the greenfield run-off rate which will ensure that there is no deterioration of the flood reaction of these streams / rivers.

The sewerage situation in Rush is acknowledged in submissions received and the Rush Network Upgrade is being progressed by Irish Water, with a completion date of late 2018 envisaged.

Drainage is accommodated under the Greater Dublin Drainage Study (GDDS) which now falls within the remit of Irish Water. The Greater Dublin Drainage project is a strategic analysis of the existing and future foul and surface water systems requirement in the Greater Dublin Area. It sets out a number of major infrastructural requirements in the region including a new Regional Waste Water Plant and Orbital Sewer, and the upgrade to the existing regional plant at Ringsend Plant.

Flooding is becoming an increasingly common issue in Ireland in general and although flooding in Fingal is relatively low there are areas which are particularly prone to flooding. The most proactive step the Council can take is the avoidance of development in floodplains and coastal areas. A Strategic Flood Risk Assessment (SFRA) has been undertaken as part of the preparation of the Draft Plan (and this is published as a separate document). All LAP's and Masterplans scheduled for completion during the lifetime of the Development Plan will also include detailed flood risk assessments.

Climate change, in combination with the on-going urbanization of catchments, means that the flood risk to property is continually changing. In order to minimize the impact of an increased future flood risk, there are various steps the Council can take and one of the key facets in managing surface water to reduce flooding potential and decrease the risk of pollution is through a design approach, known as SuDS (Sustainable Urban Drainage Systems).

There are a number of policies in the Draft Plan requiring the preparation of Strategic Flood Risk Assessments and the inclusion of SuDs in applications for new development. SuDs measures suitable to the scale and location of development are required for all new developments as appropriate. Integration of SUDS techniques within new developments will be required to ensure that the capacity of the existing network is not exceeded and the quality of the surface water runoff is not negatively impacted by the development. SUDS techniques will have the impact of both reducing pluvial and fluvial flooding and also improving discharge water quality.

The EU Water Framework Directive together with the Eastern River Basin Management Plan outlines a programme of measures that will facilitate the delivery of surface and groundwater quality targets in the County. A new three tier governance structure has been established under the *European Union (Water Policy) Regulations 2014* re-assigning functional responsibility for the Water Framework Directive (WFD).

There are a number of policies in the Draft Plan to address flooding and flood risk within the County, including Objective SW07 which states that the Council will implement the *Planning System and Flood Risk Management-Guidelines for Planning Authorities (DoEHLG/OPW 2009)* or any updated version of these guidelines. For lands identified in the SFRA, located in the following areas: Courtlough; Ballymadun; Rowlestown; Ballyboghil; Coolatrath; Milverton, Skerries; Channell Road, Rush; Blakescross; Lanestown/Turvey; Lissenhall, Swords; Balheary, Swords; Village/Marina Area, Malahide; Streamstown, Malahide;

# PART TWO

Balgriffin; Damastown, Macetown and Clonee, Blanchardstown; Mulhuddart, Blanchardstown; Portrane; Sutton; and Howth, a site-specific Flood Risk Assessment to an appropriate level of detail, addressing all potential sources of flood risk, is required, demonstrating compliance with the aforementioned Guidelines or any updated version of these guidelines, paying particular attention to residual flood risks and any proposed site specific flood management measures.

One submission received requested the insertion of the following text to Objective SW01, to read as: *'...Ensure that development does not impact on important wetland sites within river / stream catchments.'* This is agreed with and it is recommended that Objective SW01 be amended to incorporate the additional sentence.

## **Recommendation**

### **CE CH 7.13**

Amend Objectives WT03, WT04 and WT12 to read as follows:

#### **'Objective WT03**

*Facilitate the provision of appropriately sized and located waste water treatment plants **and networks**, including a new Regional Wastewater Treatment Plant and the implementation of other recommendations of the Greater Dublin Strategic Drainage Study, in conjunction with relevant stakeholders and services providers, to facilitate development in the County and Region and to protect the water quality of Fingal's coastal and inland waters through the provision of adequate treatment of wastewater.'*

#### **'Objective WT04**

*Investigate the potential for the provision of temporary wastewater treatment facilities for new developments where a permanent solution has been identified **and agreed with Irish Water** but not yet implemented and where the provision of such a facility is environmentally sustainable, meets the requirements of the Habitats Directive, and is in accordance with the recommendations of the EPA and where adequate provision has been made for its maintenance.'*

#### **Objective WT12**

*Establish **an appropriate** buffer zone around all pumping stations suitable to the size and operation of each station. **The buffer zone should be a minimum 35 metres – 50 metres from the noise / odour producing part of the pumping station to avoid nuisance from odour and noise.***

### **CE CH 7.14**

Amend Objective SW01, to read as:

#### **'Objective SW01**

Protect and enhance the County's floodplains, wetlands and coastal areas subject to flooding as vital green infrastructure which provides space for storage and conveyance of floodwater, enabling flood risk to be more effectively managed and reducing the need to provide flood defences in the future **and ensure that development does not impact on important wetland sites within river / stream catchments.**

# PART TWO

## Energy (including Renewable) and Climate Change

### Issues Raised

One submission received recommended a dedicated chapter to Climate Change within the Development Plan, which would include all the relevant actions, policies and objectives related to the fight against climate change. It was also noted that the Development Plan should reference the *National Energy Policy White Paper 'Ireland's Transition to a Low Carbon Energy Future 2015-2030'* (instead of the Green Paper on Energy Policy), which now outlines how Ireland will transform from dependent fossil fuels to a low-carbon system by 2050.

It is also noted that the Development Plan should mention the Climate Change Action Strategy to be prepared by the Council, which will include adaptation plans and actions in line with the National Climate Change Adaptation Framework. Fingal should also support 'Community Co-operative Energy Projects' and seek ways in which planning procedures could support and prioritise these projects. It is noted that community energy projects in the wind sector should be prioritised and encouraged.

One submission notes that a specific clause should be inserted into the Development Plan stating that any development approved by Fingal County Council must be in compliance with the Climate Change and Low Carbon Development Act 2015.

It is also submitted that Objectives EN02 and EN03 would be better located under the 'Renewable Energy Section' and that Objective EN08 would sit better under the 'Energy Efficiency Section' of the Development Plan.

The submission received from CODEMA (Dublin's Energy Agency) noted that in order to create a Dublin wide climate change mitigation and adaptation plan in the area of energy, Fingal needs to prepare a Spatial Energy Demand Analysis (SEDA) and a Sustainable Energy Action Plan (SEAP) in order to amalgamate with the existing SEDA and SEAPs of the other Local Authorities in Dublin. It is requested that the Development Plan wording reference to SEDA (on page 269 of the Draft) be updated to 'will' rather than 'will endeavour'.

In relation to solar energy, it is noted that it is not correct to say that solar PV provides energy consistently, as the energy production is stochastic due to changes in cloud cover and it is submitted that PV should be prioritised on land which is not useful for other purposes, such as landfill sites (as per Objective EN14). Another submission noted the need to develop an adequate policy framework and strategy for solar energy development in Fingal.

One submission highlighted the fact that the Draft Plan states that 'all new wind energy developments in the County are required to comply with the Guidelines contained within the Draft Fingal County Council Wind Energy Strategy..', it is noted that this approach needs to be extended to include Solar Photovoltaic (PV) Power Stations and Solar Energy as a matter of priority. Fingal need to develop a Solar Energy Strategy and all new and proposed solar power stations (or farms) should be required to comply with these guidelines. There is no policy framework for large scale solar energy in Ireland. It is also submitted that a solar energy study on the potential of solar energy be undertaken, with appropriate locations identified for varying types of solar panels and associated land-use policies to guide, assist and promote this new green business.

The submission received from Elgin Energy recommended the inclusion of 6 no. new policy objectives specifically relating to solar PV installations and that the Draft Plan should highlight

## PART TWO

---

the potential of such facilities in the policies and objectives that relate to Ireland's 2020 renewable energy targets.

The submission received from the Irish Wind Energy Association welcomes the integration of a Wind Energy Strategy and Green Infrastructure Strategy in to the Strategic Development Planning for the County and the IWEA welcomes Fingal's intention under Objective EN10 to support onshore and offshore wind energy as part of supporting Ireland's renewable energy commitment. The IWEA submission also welcomes Fingal's recognition that renewable energy offers sustainable alternatives to fossil fuels, and will reduce both of GHG emissions and our reliance on imported fuels. IWEA notes that Fingal County Council will endeavour to carry out a Spatial Energy Demand Analysis (SEDA) which will feed into spatial planning and energy for the County.

It is submitted that the commercial and economic impacts of an increased bioenergy sector in Fingal are not highlighted and that Fingal should take advantage of the opportunity for purpose grown bio-crops and bioenergy created from agricultural waste. Another submission noted that Fingal Council has failed to implement a municipal bio energy initiative and that there are EU funding opportunities available which the Council should be pursuing. The need for a clear disclosure on the options, cost and consequence of the fuel source proposed for the 2017-2023 Development Plan should be noted.

Another submission requested that the Council take stronger steps to promote renewable energy and suggest a requirement that new commercial buildings incorporate green roofs or solar panels.

The submission from Codema recommended that the reference to Low Carbon District Heating on page 273 be amended as it is incorrect to say that there will be a 90% reduction in fossil fuel use. It is also noted in this submission that the SEDA will map the heat demand density of Fingal and identify areas with sufficient heat demand, potential anchor load tenants for such systems and the potential low-cost and renewable sources of heat.

The submission received from Eirgrid welcomes the inclusion of Objectives EN22 and EN23 which promote energy infrastructure provision at suitable locations and commit to the preparation of a Local Authority Renewable Energy Strategy (LARES). It is noted that the Development Management process, in considering applications for electricity transmission infrastructure should encourage early engagement and discussion.

The submission received from the Department of Education and Skills acknowledges and supports the intentions of the Council with regard to its policy areas for Environment and Infrastructure, and Climate Change resilience. It is submitted that the Department's own energy conservation measures for schools are already fully compatible with the policy objectives of the Council, but wholly appropriate for school locations. The Department is also of the view that all educational buildings should be specifically excluded from the requirement to use green roof technology. It is submitted that such roofs are not appropriate on educational buildings as they may impact on the viability of rain water harvesting in schools and impose unnecessary maintenance and operational costs on school Boards of Management to maintain the roofs on an ongoing annual basis, in addition to increasing the capital cost of school projects. It is also noted that green roof provision is not required given the range of elements integral to the design of all school buildings which already achieve the overall stated benefits of green roofs. Schools that are designed and built in accordance with the Department's Schools Technical Guidance Documents must achieve an A3 Building Energy Rating.

# PART TWO

---

It is requested that Section 7.3 Energy (of the Draft Plan) be modified to state that such green design and energy strategies for schools shall be specifically guided by the schools specific conservation measures promoted by the Department of Education and Skills and captured in its technical guidance documents.

## **Chief Executive Response**

The submission requesting a dedicated chapter to Climate Change is noted. It is not recommended that a separate chapter be created for Climate Change, given the fact that this is a cross-cutting theme of the Development Plan and climate change permeates a number of chapters and is built into the strategic policies and recommendations of the Draft Plan. It is recommended that Section 7.3 be re-named as '*Energy and Climate Change*' and it is also recommended that additional text be inserted into the written statement to update Fingal's status regarding the preparation of the Climate Change Mitigation and Adaptation Strategy in conjunction with the other Dublin Local Authorities. This is discussed in more detail below.

The submission requesting that the reference to the Green Paper on Energy Policy should be replaced with the National Energy Policy White Paper '*Ireland's Transition to a Low Carbon Energy Future 2015-2030*' is agreed with and it is recommended that the reference on page 268 of the Draft Plan be updated and the relevant paragraph be amended accordingly.

The submission noting that Objectives EN02 and EN03 would be better located under the 'Renewable Energy Section' and that Objective EN08 would sit better under the 'Energy Efficiency Section' of the Development Plan is agreed with and it is recommended that these Objectives be re-arranged and re-positioned accordingly.

## **Climate Change Mitigation and Adaptation Strategy**

The *Climate Action and Low Carbon Development Act 2015* established the national objective of transition to a low carbon, climate resilient and environmentally sustainable economy in the period up to and including the year 2050. The Draft Development Plan contains adaptation and mitigation measures and actions to address Climate Change and Fingal County Council recognises the need for the development of a robust strategy to increase climate resilience. Mainstream policies will be incorporated into the Draft Development Plan and integrated with National Plans and those of neighbouring Local Authorities.

The importance of factoring climate change adaption measures into the Development Plan is recognised and the Draft Plan will have regard to the *National Climate Change Adaptation Framework, Building Resilience to Climate Change (2012)*, which requires the integration of adaptation and mitigation measures into the Plan. The Department of Housing, Planning Community and Local Government has been identified as the lead body on National Adaptation Policy and Local Authorities have been given the role to prepare local 'Adaptation Plans' through the Development Plan review process. In May 2016 the EPA published '*Local Authority Adaptation Strategy Development Guidelines*'. These Guidelines are designed to assist Local Authorities in developing local Climate Change Mitigation and Adaptation Strategies which will assess local vulnerability to climate risks and identify, cost and prioritise adaptation actions. It is noted that this Guidance can be used by each Local Authority to assess the adaptation fitness and coherence of its spatial plans and the other plans and policies under its remit.

The Guidelines follow a clear step by step process to adaptation planning and subscribe to an 'adaptive risk management' approach. The Guidelines describe the tasks that a Local Authority

## PART TWO

---

needs to complete in order to develop, adopt and implement an Adaptation Strategy. The six stages are summarised as follows:

1. Forming an adaptation team and preparing the ground.
2. Assessing the current adaptation baseline.
3. Assessing future climate risk.
4. Identifying, assessing and prioritising adaptation options,
5. Developing an adaptation pathway map and drafting the adaptation strategy.
6. Mainstreaming, monitoring and reviewing the adaptation strategy.

Fingal is working closely with Codema (Dublin's Energy Agency) and is at the initial stage of forming an adaptation team and assessing the current adaptation baseline. In response to the climate change challenge, the 4 Dublin Local Authorities (Dublin City Council, Dun-Laoghaire-Rathdown, Fingal and South Dublin County Council) have established expert steering groups with the goal of developing co-ordinated action plans to address the interconnected challenges of climate mitigation, adaptation and carbon free sustainable energy. The Dublin Local Authorities will act in unison and will work with all relevant stakeholders in order to deliver an inclusive and interconnected Climate Change Mitigation and Adaptation Action Plan. Internationally, Fingal will liaise closely with the Covenant of Mayors and the Council is currently preparing documentation to become one of the international signatories (alongside the other Dublin Local Authorities). Fingal, in conjunction with the other Local Authorities and Codema will also seek to draw down funding from various EU funding streams, such as LIFE+, INTERRED, Horizon 2020 and URBTRACT. Private commercial opportunities will also be encouraged wherever possible to deliver solutions.

Preparing a Strategy is likely to be a task which will require significant resources and 'buy in' at all levels and from all Council departments. Due to the timeframes involved in terms of preparation of the Draft Plan, it is therefore likely that the Strategy will be completed post-adoption of the Draft Plan and will therefore be incorporated into the adopted Development Plan by way of a statutory Variation at a later date. It is also recommended that Objective EN02 of the Draft Plan be amended to include reference to the preparation of the Climate Change Mitigation and Adaptation Strategy.

Fingal will also work closely with Codema on the preparation of a Spatial Energy Demand Analysis (SEDA) as part of the Climate Adaptation Strategy. This will integrate energy planning into traditional spatial planning practices and will create an evidence-based energy-related planning policy and associated actions. The SEDA will show exactly where and what type of energy is being used, and the costs of this energy consumption throughout the County in the different sectors (residential, commercial and Local Authority).

The Council recognises the need for cost effective and reliable sources of power that are capable of accommodating the future growth and development of Fingal both for residential and commercial purposes and the Council supports the development of renewable sources of energy that offer sustainable alternatives to our dependency on fossil fuels and acknowledges that solar energy, along with wind generation, bio-fuels, marine based energy generation and geothermal has an important role to play in meeting future energy needs, and in meeting Ireland's 2020 Renewable Energy Targets as set out under the EU 2020 Climate and Energy Package. The Council will encourage community co-operative energy projects, where appropriate and this is supported with the inclusion of Objective EN04 of the Draft Plan which seeks to: *'support and encourage pilot schemes which promote innovative ways to incorporate energy efficiency.'*

# PART TWO

---

## Renewable Energy

The submissions recommending that the Council take stronger steps to promote renewable energy and that the Development Management process should encourage early engagement and discussion when planning applications are to be lodged for electricity transmission infrastructure are noted. The Council is supportive of such applications, as promoted through the inclusion of a number of relevant Objectives (EN01 to EN05) of the Draft Plan and the Council actively promotes renewable energy throughout the Development Plan policies. This will be further supported through the preparation of the Climate Change Mitigation and Adaptation Strategy and signing up to the International Covenant of Mayors.

The submission noting that it is not correct to say that *'solar PV provides energy consistently.'* (paragraph 4, page 271 of Draft Plan) as the energy production is stochastic due to changes in cloud cover is acknowledged and it is recommended that this paragraph be re-worded. The Council promotes and encourages the development of Solar PV Farms at suitable sites within the County, as acknowledged in Objective EN14.

The need for an adequate policy framework and strategy for solar energy development in Fingal is highlighted in submissions received and is acknowledged by the Council. In the absence of a Strategy and / or Guidelines for the development of Solar PV farms in the County, the Council will be guided by National Policy in this regard. Furthermore, the Council will be preparing a detailed Climate Change Mitigation and Adaptation Strategy, which will include policies and guidance relating to solar technology and installations. It is not considered necessary to include additional objectives specifically relating to Solar PV installations (as suggested in one submission received) and it is considered that the development of Solar PV installations is adequately addressed under Objectives EN12 to EN15 within the Draft Plan.

Submissions received relating to the commercial and economic impacts of an increased bioenergy sector in Fingal are noted and the Council recognises the importance of this sector in Section 7.3 of the Draft Plan and associated objectives (EN18 to EN20). It is not considered necessary to include additional text and Objectives in this regard and the issue of bioenergy will be further examined in the context of the Climate Change Mitigation and Adaptation Strategy, which is to be prepared by Fingal in conjunction with Codema and the other Dublin Local Authorities.

The CE notes the submission received from Ecocem requesting that additional text relating to low carbon building materials such as low carbon cement be included within the written statement of the Draft Plan, which would enhance the sustainability of the Plan. However, it is considered that the existing Draft Development Plan policies adequately address this issue and promote the use of low carbon building materials and green construction materials. It is not considered appropriate to reference one specific material (such as low carbon cement) over another. It is considered that the Council, through its Development Plan policies and objectives, promotes best practice techniques and encourages the use of innovative and sustainable materials, without specifying which materials to be used.

The submission from Codema recommending that the reference to Low Carbon District Heating (on page 273) be amended as it is incorrect to say that there will be a 90% reduction in fossil fuel use is noted, and it is therefore recommended that this paragraph be amended accordingly.

# PART TWO

## Energy Efficient Design

The submission from the Department of Education and Skills and their concern relating to the requirement to use green roof technology on all educational buildings is noted and agreed with and it is recommended that any future school development will be referred to the Department of Education and Skills for advice in terms of the latest technology and school design guidance.

It is recommended therefore that Objective SW06 be amended to remove the reference to green roofs on educational buildings.

The Council remain proactive on the issue of green roofs, green walls, solar panels, rainwater harvesting, grey-water schemes and other sustainable design features and there are many existing examples of such measures in place within the County. Existing policies in the current Development Plan will be reviewed and updated, where appropriate. Fingal County Council will continue to promote high standards in terms of energy reduction and sustainability and will strive to be a leader of energy efficient development.

### **Recommendation:**

#### **CE CH 7.15**

Amend 'Section 7.3 Energy' to read as:

'7.3 Energy **and Climate Change**' (and update the Table of Contents accordingly).

The reference to the Green Paper on Energy Policy should be replaced with the National Energy Policy White Paper 'Ireland's Transition to a Low Carbon Energy Future 2015-2030' on page 268 of the Draft Plan. It is recommended that the following paragraph be removed and replaced as follows:

Delete paragraph 2 on page 268 of the Draft Plan:

~~'Since the publication of the 2007 Energy Policy Framework, Delivering A Sustainable Energy Future for Ireland, global, EU and Irish energy landscape have undergone huge change as new technologies provide cleaner fuels, as outlined in the Green Paper on Energy Policy in Ireland published by the Department of Communications, Energy and Natural Resources, which looks at Irish energy policies priorities towards 2030. Increasing renewable energy supplies have helped decarbonise the Irish economy.'~~

And replace with:

**'Since the publication of the '2007 Energy Policy Framework, Delivering A Sustainable Energy Future for Ireland', global, EU and the Irish energy landscape have undergone huge changes as new technologies provide cleaner fuels. The recently published National Energy Policy White Paper 'Ireland's Transition to a Low Carbon Energy Future 2015-2030' published by the Department of Communications, Energy and Natural Resources, is a complete energy policy update which sets out a framework to guide policy and the actions that Government intends to take in the energy sector from now up to 2030.**

**The paper takes into account European and International climate change objectives and agreements, as well as Irish social, economic and employment priorities. As we progress towards a low carbon energy system, this policy update will ensure secure supplies of competitive and affordable energy to our citizens and businesses.'**

#### **CE CH 7.16**

Re-locate Objectives EN02 and EN03 to be included within the list of objectives under the 'Renewable Energy Section' (on page 270 of the current Draft Plan).

# PART TWO

---

## CE CH 7.17

Re-locate Objective EN08 to be included under the 'Energy Efficiency Section' (on page 268 of the current Draft Plan).

## CE CH 7.18

Amend wording of Objective EN02 (page 268) of the Draft Plan to include reference to the preparation of the Climate Change Mitigation and Adaptation Strategy:

## CE CH 7.19

### 'Objective EN02

~~Undertake a Local Authority Renewable Energy Strategy (LARES)~~  
and replace with:

### **'Objective EN02**

**Prepare a Climate Change Mitigation and Adaptation Strategy and a Local Authority Renewable Energy Strategy (LARES), Spatial Energy Demand Analysis (SEDA) and a Sustainable Energy Action Plan (SEAP).'**

## CE CH 7.20

It is also recommended that the wording reference to SEDA be updated to 'will' rather than 'will endeavour' (in paragraph 5, page 269 of the Draft Plan):

*The Council ~~will endeavour~~ to work with Fingal's energy advisors Codema to carry out a Spatial Energy Demand Analysis (SEDA) of the County which would facilitate an integrated approach to spatial planning and energy resulting in a better spatial understanding of energy needs.'*

## CE CH 7.21

Amend paragraph 4 on page 271 of the Draft Plan relating to Solar Energy as follows:

*'In the publication *Adding Solar Power to Irelands Energy Mix*, Lightsource Renewable Energy Limited it is estimated that by 2020 over 20% of Irelands energy could be generated by solar photovoltaic (solar PV). ~~Solar PV provides energy consistently and~~ By adding solar PV to Irelands energy mix, it will complement existing infrastructure as well as drive further renewable energy production. It is considered that solar PV farms are generally inconspicuous at ground level and are hidden by hedgerows. Additionally such farms can facilitate the regeneration of natural habitats in the rural areas.'*

## CE CH 7.22

Delete the Section 'Energy Strategy for Fingal' on page 274 of the Draft Plan and Replace with the Following Text and Objectives:

## CE CH 7.23

Delete the following paragraphs on page 274:

### **Energy Strategy for Fingal**

~~To implement national policy on a local basis, Fingal County Council will prepare a Local Authority Renewable Energy Strategy (LARES). The aims of the strategy is to develop policies and actions which can realistically and coherently make the maximum contribution to the national effort to address climate change and maximise the harvesting of renewable energy resources most appropriate to the County and in a manner which is consistent with proper planning and sustainable development.~~

# PART TWO

~~To advance the Strategy, a Sustainable Energy Forum is proposed with Fingal County Council as the lead agency with relevant stakeholders and various interest groups. The Strategy shall include a Spatial Energy Demand Analysis (SEDA) of the County which would facilitate an integrated approach to spatial planning and energy resulting in a better spatial understanding of energy needs.~~

## **Objective EN23**

~~Establish a Sustainable Energy Forum within Fingal County Council to prepare a Local Authority Renewable Energy Strategy with relevant stakeholders and various interest groups within the County.~~

Replace with the following:

### *Climate Change Mitigation and Adaptation Strategy*

*The Climate Action and Low Carbon Development Act 2015 established the national objective of transition to a low carbon, climate resilient and environmentally sustainable economy in the period up to and including the year 2050. The Draft Development Plan contains adaptation and mitigation measures and actions to address Climate Change and Fingal County Council recognises the need for the development of a robust strategy to increase climate resilience. Mainstream policies will be incorporated into the Draft Development Plan and integrated with National Plans and those of neighbouring Local Authorities.*

*The importance of factoring climate change adaption measures into the Development Plan is recognised and the Draft Plan will have regard to the National Climate Change Adaptation Framework, Building Resilience to Climate Change (2012), which requires the integration of adaptation and mitigation measures into the Plan. The Department of Housing, Planning Community and Local Government has been identified as the lead body on National Adaptation Policy and Local Authorities have been given the role to prepare local 'Adaptation Plans' through the Development Plan review process. In May 2016 the EPA published 'Local Authority Adaptation Strategy Development Guidelines'. These Guidelines are designed to assist Local Authorities in developing local climate change mitigation and adaptation strategies which will assess local vulnerability to climate risks and identify, cost and prioritise adaptation actions. It is noted that this Guidance can be used by each Local Authority to assess the adaptation fitness and coherence of its spatial plans and the other plans and policies under its remit.*

*The Guidelines follow a clear step by step process to adaptation planning and subscribe to an adaptive risk management approach. The Guidelines describe the tasks that a Local Authority needs to complete in order to develop, adopt and implement an Adaptation Strategy. The six stages are summarised as follows:*

- 1. Forming an adaptation team and preparing the ground.*
- 2. Assessing the current adaptation baseline.*
- 3. Assessing future climate risk.*
- 4. Identifying, assessing and prioritising adaptation options,*
- 5. Developing an adaptation pathway map and drafting the adaptation strategy.*
- 6. Mainstreaming, monitoring and reviewing the adaptation strategy.*

*Fingal is working closely with Codema (Dublin's Energy Agency) and is at the initial stage of forming an adaptation team and assessing the current adaptation baseline. In response to the climate change challenge, the 4 Dublin Local Authorities (Dublin City Council, Dun-Laoghaire-Rathdown, Fingal and South Dublin County Council) have established expert steering groups with the goal of developing co-*

# PART TWO

ordinated action plans to address the interconnected challenges of climate mitigation, adaptation and carbon free sustainable energy. The Dublin Local Authorities will act in unison and will work with all relevant stakeholders in order to deliver an inclusive and interconnected climate change mitigation action plan. Internationally, Fingal will liaise closely with the Covenant of Mayors and is currently preparing documentation to become one of the signatories (alongside the other Dublin Local Authorities). Fingal, in conjunction with the other Local Authorities and Codema will seek to draw down funding from various EU funding streams, such as LIFE+, INTERRED, Horizon 2020 and URBTRACT. Private commercial opportunities will also be encouraged wherever possible to deliver solutions.

Preparing a Strategy is likely to be a task which will require significant resources and 'buy in' at all levels and from all Council departments. Due to the timeframes involved in terms of preparation of the Draft Plan, it is therefore likely that the Strategy will be completed post-adoption of the Draft Plan and will therefore be incorporated into the adopted Development Plan by way of a statutory Variation at a later date.

Fingal will also work closely with Codema on the preparation of a Spatial Energy Demand Analysis (SEDA) as part of the Climate Adaptation Strategy. This will integrate energy planning into traditional spatial planning practices and will create an evidence-based energy-related planning policy and associated actions. The SEDA will show exactly where and what type of energy is being used, and the costs of this energy consumption throughout the County in the different sectors (residential, commercial and Local Authority).

*'Objective EN23*

*Establish a Climate Change Adaptation Team within Fingal County Council to prepare a Climate Change Mitigation and Adaptation Strategy with relevant stakeholders, Dublin Local Authorities and various interest groups.'*

## **CE CH 7.24**

Amend paragraph 1 on page 273 of the Draft Plan, as follows:

### **'Low Carbon District Heating**

*District heating is one of the most efficient and cost effective ways to heat apartments, homes and mixed use developments. ~~As the system is centralised there will be a 90% reduction in fossil fuel use and significantly reduces the carbon footprint of the development.~~ District heating networks can be based on a variety of technologies and renewable energy sources, such as combined heat and power (CHP), biomass energy, geothermal or energy from waste.'*

## **CE CH 7.25**

Amend wording of Objective SW06 (page 261) to remove the reference to green roofs on educational buildings.

*'Objective SW06*

*Encourage the use of Green Roofs particularly on apartment, commercial and leisure ~~and educational~~ buildings.'*

# PART TWO

## Information and Communication Technologies

### Issues Raised

Telecommunication infrastructure plays a vital role in both the economic development of Fingal but also in the development of the County socially to avoid isolation and social exclusion. Submissions received note the need for better broadband and satellite coverage in certain parts of the County, including Ballyboughal, Balbriggan and Stephenstown.

One submission noted that the objectives relating to telecommunication antennae be merged with similar objectives contained within Chapter 12 (Development Management Standards), for example Objectives IT05 and IT07 be merged with IT08 and DMS 143 and 144. This submission also recommends the inclusion of new text and objectives relating to the monitoring of telecommunications installations, the need for a register of approved telecommunications structures, access roads to serve such structures, the location of satellite dishes in areas, etc.

### Chief Executive Response

The provision of a good quality high speed broadband and telecommunications service is essential for supporting and attracting business development and socially for the prevention of isolation and social exclusion. It is considered that Fingal has good broadband coverage generally. However it is acknowledged that there are parts of the County, both in urban and rural areas that are deficient in such services. The Draft Plan will promote the upgrade of such services by means of appropriate objectives and balance the need to remain flexible in terms of facilitating and adapting to advances in technology while ensuring that the environment and visual amenities of the County are not impacted upon.

The Council is guided by the *Telecommunications Antennae and Support Structure Guidelines for Planning Authorities* and any updates / amendments to this information. It is considered that the Objectives contained within the Draft Plan under Telecommunications Antennae (Chapter 7 - Objectives IT05 to IT08) and (Chapter 12 - Objectives DMS142 to 144) adequately address issues relating to telecommunications infrastructure provision in the County.

It is acknowledged that there is some overlap in terms of objectives relating to telecommunications structures being included within both Chapter 7 and Chapter 12. However, Chapter 7 relates primarily to the general provision of telecommunications infrastructure throughout the County, whereas the Objectives included within Chapter 12 specifically relate to the actual design of such structures, their co-location with other providers, and the information required to be submitted to the Council when making a planning application for telecommunications antennae and support structures.

### Recommendation

No Change

# PART TWO

---

## Waste Management

### Issues Raised

A number of submissions requested the need for litter management in town centres and one submission requests a policy on dumping / fly-tipping in rural areas, as this is a huge issue in recent years.

One submission received notes their support for Objective WM01, which facilitates the sustainable expansion of existing Authorised Treatment Facilities for end of life vehicles and the submission seeks the retention of this objective and map based Local Objective 17 within the Development Plan.

The need for extended opening hours at the Coolmine Recycling Centre was also noted in one submission received.

### Chief Executive Response

Issues raised concerning the opening hours of Coolmine Recycling Centre are noted. The operating hours of such facilities is not within the remit of the Development Plan process. It is considered that the existing policies and objectives within the Draft Plan sufficiently deal with the promotion and expansion of recycling facilities within the County. The extension of opening hours at this facility should be considered in the context of available resources.

The problem with fly-tipping / dumping in certain areas of the County is acknowledged. In respect of littering, the Council offers a free phone number for people to contact its Litter Management Unit to report any such offences. *Fingal Litter Management Plan 2012-2015* includes measures and policies covering litter prevention, awareness and education; enforcement measures to prevent and control litter; litter management operations and implementation and monitoring.

The support for Objective WM01 is noted whereby the Council will facilitate the sustainable expansion of existing Authorised Treatment Facilities for end of life vehicles complying with *European Union (End of Life Vehicles) Regulations 2014*, other relevant legislation and the *Eastern Midlands Regional Waste Management Plan 2015-2021* and it is recommended that the relevant objectives remain in the Draft Plan.

### Recommendation

No Change.

# PART TWO

---

## Other

### **Summary of Issues Raised:**

One submission requested that a new section be added to Chapter 7 to address the issue of overhead cables and the impact on visual amenity.

### **Response**

It is considered that this issue is adequately addressed in Chapter 12 – page 442 ‘Overhead Cables’ under Objectives DMS138 to 141.

### **Recommendations**

No change.

# PART TWO

## Chapter 7: Movement and Infrastructure (Dublin Airport).

### Submissions Received Relevant to this Chapter.

D00331, D00327, D00536, D00564, D00609, D00600, D00616, D00636, D00505, D00234, D00556, D00559, D00409, D00683, D00568, D00577, D00578, D00705, D00768, D00674, D00564, D00643, D00566.

### Summary of Issues

The submissions can be summarised as falling within the following themes;

Airport related concerns.

- Lack of information and consultation concerning airport and related development.
- Impact of airport on local communities (particular reference to St. Margareths and Portmarnock).
- Request for community engagement.
- Requests to ensure that the airport is operated in line with conditions of permission and relevant statutory requirements.
- Impact of airport development on traffic and infrastructure.
- Climate Change and pollution.
- Noise.
- Traffic- Public transport and road requirements.
- Drainage and Flooding.
- Review the need for retaining the Crosswind Runway on completion of the second east-west runway and consider its removal from usage.
- Consult with key stakeholders and adjacent landowners prior to implementation of policies determined by the Government in relation to Public safety Zones for Dublin Airport.
- Any development to comply with most up to date EU Directives and Regulation (WHO recommendations).
- Clarification in respect of Objective ED30.
- Concern raised over the content of the Dublin Airport Central Masterplan (May 2016) and possible transport implications.

Zoning and inclusion of land in LAP Submissions:

- Support National and Regional transport policies.
- Support for the preparation of an LAP for Dublin Airport which facilitates sustainable expansion.
- Request for increased flexibility surrounding development within noise zones.
- Development of Western Campus to be safeguarded in the Draft Plan.
- Inclusion of lands to west of Dublin Airport at Dunsoghly.
- Public transport (LUAS) and roads upgrades to be facilitated.
- Review the need for retaining the Crosswind Runway on completion of the second east-west runway and consider its removal from usage.
- Consult with key stakeholders and adjacent landowners prior to implementation of policies determined by the Government in relation to Public safety Zones for Dublin Airport.
- Inclusion of policy ensuring minimisation of conflict with surrounding land uses.

Support for continued airport growth:

# PART TWO

- Support for continued role of airport as a national resource by facilitating sustainable growth in passenger and freight throughput and facilitate national economic growth through connectivity at Dublin Airport
- Development of airport and prioritisation of infrastructure in line with Government policy.
- Encourage commercial and economic activity, facilitate development of new markets and allow for capacity to meet projected growth.
- Recognition of employment role of Dublin Airport.
- Inclusion of Dublin Airport in Core Strategy.

Policy Amendments proposed to:

- Inclusion of lands to be zoned to the west of Dublin Airport.
- Ensure optimal long term development of lands to West of Dublin Airport and ensure lands in proximity to the airport can be developed to the optimal requirements of the airport area.
- Extend Dublin Airport to include lands to the west of Dublin Airport.
- Allow for further LUAS cross line service.
- DA05- Facilitate delivery by 2020 of a second major east-west runway at Dublin Airport and the extension of the existing east west runway 10/28.
- DA12- Review the need for retaining the Crosswind Runway on completion of the second east-west runway and consider its removal from usage.
- DA07- Omission of reference to recognition of housing need of existing farming families and time based operational restrictions to be replaced with updated policy which proposes to minimise potential for conflict between sustainable airport growth, and adjacent residential communities.
- Update of DA11 in line with EU regulation.
- Inclusion of car parking areas within airport boundary.
- Update of DA zoning objective and Vision.
- Update of RF51 to include consideration of sites for housing clusters.
- Inclusion of new policy supporting prioritisation of infrastructure at airport.
- Update SW04 relating to use of SUDS in proximity to the airport.
- Update WT09 relating to use of wetlands in proximity to the airport.
- Update WQ05 and NH22 relating to removal of requirement of riparian strips at the airport.
- Update PM11 and Map Based Objective 57 relating to consideration of Dublin Airport Central Masterplan.
- Provide for helicopter maintenance and heli-facilities.

## **Chief Executive Response:**

The detailed contents of the various submissions are welcomed and are addressed as follows.

It is considered that the caveats contained within the Draft Plan to mitigate against inappropriate residential development in the Inner Noise Zone whilst providing for the housing needs of the limited number of farming families in the area are appropriate.

A number of submissions relate to requests for further consultation with the DAA and access to information in relation to the impact of the Airport on communities. These requests are recognised and in this regard the Plan contains policy to prepare and implement a new Local Area Plan for Dublin Airport (the extension or review of any LAP is subject to its own statutory process with the County Development remaining the parent document) which will include a full public consultation process in relation to land use planning and Dublin Airport. The Draft Plan

## PART TWO

---

also commits to stakeholder engagement as part of the Dublin Airport Stakeholders Forum and it is recommended that this commitment to community engagement should be extended to include other public and community stakeholder forums.

A number of submissions relate to the operation of activities on the ground at Dublin Airport and enforcement of compliance with planning conditions which is dealt with under a separate process to the Development Plan. The enforcement and compliance with conditions is covered by statute and therefore Fingal County Council are required to deal with such issues under the Planning and Development Act regardless of the policies contained in a Development Plan. In this regard it is not considered appropriate that the Development Plan be amended to have regard to this specific issue.

Further, in terms of operations at Dublin Airport, a number of concerns have been raised in relation to the impact of airport development on traffic and infrastructure, climate change and pollution, noise, public transport and road requirements, drainage and flooding, interaction with communities, impact of public safety and noise zones and runway restrictions. It is considered that these issues are more suitably dealt with by way of detailed specialised assessments to be prepared in the context of a comprehensive Local Area Plan review which will deal with the long term development of Dublin Airport and environs.

In terms of the support for the development of Dublin Airport and recognition of the economic significance of the sector, the Draft Plan recognises that Dublin Airport is the principal gateway to Ireland and the most significant economic entity and largest provider of employment in the County, and the region. Accordingly, policy supporting this role has been provided.

The submission from the TII and the concerns raised are acknowledged. It should be noted that Objective ED31 seeks to protect the core function of the airport and it is considered appropriate that the recent Masterplan for Dublin Airport will be considered in context of the Local Area Plan review process and these issues may be considered at this time.

Further, an additional policy is proposed (see Chapter 7) to *'Maintain and protect the safety, capacity and efficiency of National roads and associated junctions in accordance with the Spatial Planning and National Roads Guidelines for Planning Authorities, DECLG, (2012), the Trans-European Networks (TEN-T) Regulations and with the regard to other policy documents, as required.*

The Draft Plan supports and facilitates the construction of the Swords Western Relief Road through Objective SWORDS 13 and Table 7.1 of the Draft Plan. Road infrastructure necessary to facilitate the development of the Airport lands to Cherryhound is promoted within Objectives ED30, DA24 and DA25 of the Draft Plan and specifically within Table 7.1. The St. Margaret's Bypass to the Northern parallel road is included in the Road Schemes set out in Table 7.1. A Traffic Impact Assessment in relation to the subject lands is also envisaged as part of the development of a future planning framework for the area.

The Draft Plan includes an objective to prepare and implement a new Local Area Plan for Dublin Airport which will accommodate the future sustainable growth and development of the airport lands, while also facilitating the efficient and effective operation of Dublin Airport in accordance with the requirements of the LAP and proper planning and sustainable development. This review process will involve a detailed assessment of the various considerations related to airport development (traffic, noise, flooding, public safety, environment, climate change, community impact, legislative obligations etc.). The LAP process will be open to public consultation processes

## PART TWO

---

as prescribed by the Planning & Development Act and it is envisaged that substantial public engagement will ensue as part of this process.

It is considered that the Dublin Airport Local Area Plan review, when complete, will create a context for the long-term development of the area together with the prioritisation of infrastructural development necessary to support this strategic vision. Further, in relation to the adjacent St Margarets, the Plan proposes to 'prepare a Strategy for St Margarets Special Policy Area' which will assess the future sustainable development of the area.

One of the key aims of the draft Fingal Development Plan is to 'ensure an adequate supply of zoned lands to meet forecasted and anticipated economic and social needs, while avoiding an oversupply which would lead to fragmented development, dissipated infrastructural provision and urban sprawl.' The Draft Development Plan adequately addresses the supply of lands required for future needs including the airport. It is considered that the extent of the Airport Local Area Plan boundary which has been established over a number of plan periods based on the physical infrastructure and road networks in the area is appropriate (with the R108 and Old Airport Road acting as the established line along the southern boundary). The area has been designated to ensure the future development of the Airport in a consolidated fashion and it is not considered appropriate to extend the boundaries of the Plan having consideration to the extensive area of existing lands for development.

The Draft Plan further supports the development of the Airport, whilst ensuring a balance is achieved between harnessing the unique potential of Dublin Airport as an economic generator and major employer in the County and protecting its core operational function as the country's main international airport. Accordingly, it is considered that there are sufficient lands zoned for economic growth in the vicinity of the Airport pending a future review of the Council's employment strategy and full assessment of the infrastructural impacts associated with any further designation of lands for economic development. Prior to any revised zonings, the traffic impact of such proposed rezonings would need to be quantified as would the location of any further park and ride facilities. It should be noted that park and ride facilities are best suited to strategic road corridors.

The extent and location of car parking facilities should be assessed on an ongoing basis in line with existing and expected public transport improvements (including Metro North as set out in the Capital Investment Plan) and modal spilt initiatives to reduce the demand for long term, short term and employee car parking spaces at Dublin airport. In this regard CP9 seeks to *'control the supply of car parking at the airport so as to maximise as far as is practicable the use of public transport by workers and passengers and to secure the efficient use of land.'* Accordingly it is considered that the existing zoning of the lands associated with the car park areas identified facilitates their existing use and it is not considered that an amendment of the Plan boundary would be of any further benefit in the context of their long term use for car parking. Recognition of the areas as established car parking facilities associated with the airport should however be included in the Plan (see Sheet 11).

Since 2012 emissions from all flights from, to and within the European Economic Area (EEA) are included in the EU emissions trading system (EU ETS). Airlines receive tradeable allowances covering a certain level of CO2 emissions from their flights per year. It is considered that the upcoming LAP review will include policy which supports EU plans to combat climate change and reduce industrial greenhouse gas emissions in a cost-effective manner. Additionally, it is recommended that additional text be inserted into the written statement to update Fingal's status regarding the preparation of the Climate Change Mitigation and Adaptation Strategy in

# PART TWO

conjunction with the other Dublin Local Authorities (see chapter 7 Movement and Infrastructure for detailed response on Climate Change). On a related point, Objective ED30 should be reworded to provide clarity in respect of the long term growth of the aviation sector in line with the principles of sustainable development.

The use of lands formerly associated with Local Objective 354 for helicopter maintenance and heli-facilities is recognised however it should be noted that this is a non-conforming use. Objective Z05 of the Draft Plan allows non-conforming uses to continue to develop where the proposed development would not be detrimental to the amenities of the surrounding area and would accord with the principles of proper planning and sustainable development. The suggestion to reinstate Local objective 354 would be contrary to the GB zoning and at variance with the objective and vision set out under this zoning objective. Such an amendment would therefore be inappropriate and unnecessary.

The theory behind the request for the inclusion of Dublin Airport as part of the Core Strategy is considered to warrant merit, however, Core Strategies, as prescribed, are relevant to residential land only. Core Strategies are required by the Planning and Development Act 2000 (as amended) to demonstrate that the development plan and housing strategy are consistent with the National Spatial Strategy and the regional spatial and economic strategy in respect of the area in the development plan already zoned for residential use or a mixture of residential and other uses. In this regard the inclusion of Dublin Airport as part of the current Core Strategy is considered inappropriate. It is however considered that a submission to the upcoming Regional Spatial and Economic Strategy in relation to inclusion of Dublin Airport with regard to a similar type process for economically developed zoned lands would be relevant.

In the context of the upcoming Dublin Airport Local Area Plan review, it is considered that existing plan policy, is sufficiently robust in terms of the future development of Dublin Airport, save for the policy revisions as set out in the Chief Executive's Recommendations below.

## **Recommendations:**

### **CE CH 7.26**

It is recommended that the following policy amendments be included in the Plan.

Objective ED30

~~Ensure that the required infrastructure and facilities are provided at~~ *Support the provision of necessary infrastructure and facilities at Dublin Airport so that to enable the sustainable development of the aviation sector can develop further and operate to its maximum sustainable potential,* whilst taking into account the impact on local residential areas, and any negative impact such proposed developments may have on the sustainability of similar existing developments in the surrounding area.

### **CE CH 7.27**

Objective DA01

Facilitate the operation and future development of Dublin Airport, *in line with Government policy,* recognising its role in the provision of air transport, both passenger and freight.

### **CE CH 7.28**

Objective DA06

Continue to participate in the Dublin Airport Stakeholders Forum, *St Margarets Community Liaison Group and other public stakeholder forums involving which includes* representatives from local authorities, airport operators, community and other stakeholders, providing a forum for discussion of environmental, *community* and other issues.

# PART TWO

---

## **CE CH 7.29**

Objective DA09

Ensure that aircraft-related development and operation procedures proposed and existing at the Airport ~~takes account and uses~~ *consider* all measures necessary to mitigate against the ~~possible~~ *potential* negative impact of noise from aircraft operations (such as taxiing, taking off and landing), on existing established residential communities, whilst not placing unreasonable restrictions on airport development, ~~and~~ taking into account EU regulation 598/2014 *(or any future superseding EU regulation applicable)* *having regard to the 'Balanced Approach' and the involvement of communities in ensuring a collaborative approach to mitigating against noise pollution.*

## **CE CH 7.30**

Objective DA11

Review the operation of the Noise Zones on an ongoing basis in ~~light of the EU Directive on Environmental Noise~~ *line with the most up to date legislative frameworks in the area*, the ongoing programme of noise monitoring in the vicinity of the Airport flight paths, and the availability of improved noise forecasts.

## **CE CH 7.31**

Objective DA14

*Review Public Safety Zones associated with Dublin Airport and implement the policies to be determined by the Government in relation to these Public Safety Zones for Dublin Airport.*

## **CE CH 7.32**

ZONING OBJECTIVE "DA" DUBLIN AIRPORT

*Note: The extent to which the Dublin Airport LAP relates is set out under the 'DA-Dublin Airport' zoning and includes any associated lands identified as part of the designation of airport noise zones, noise contours, airport approach areas, public safety zones or other zones identified as necessary for designation in order to maintain or increase the quality of life of neighbouring communities and foster compatibility between aviation activities and residential areas.*

## **CE CH 7.33**

'Objective EN02

~~Undertake a Local Authority Renewable Energy Strategy (LARES)~~

*'Prepare a Climate Change Mitigation and Adaptation Strategy, to include a Local Authority Renewable Energy Strategy (LARES), Spatial Energy Demand Analysis (SEDA) and a Sustainable Energy Action Plan (SEAP).'*

# PART TWO

## Chapter 8 - Green Infrastructure

### Submissions Received Relevant to this Chapter

D00002 D00003 D00048 D00072 D00096 D00186 D00244 D00432 D00443 D00448 D00525 D00528 D00543 D00576 D00583 D00621

A number of observations within the 16 no. submissions expressed support for objectives in this Chapter. These submissions are noted.

### Summary of Issues

#### Background

Fáilte Ireland seek reference in the Development Plan to the 2015 UNESCO expansion of the Dublin Bay Biosphere to be included as part of the introduction to Chapter 8, Green Infrastructure.

Keep Ireland Open (KIO) seek a rewording to the definition of green infrastructure.

#### Fingal's Green Infrastructure

The repositioning of objectives GI 01 & GI 02 to section 8.3 is sought.

It is sought that existing green spaces within Fingal are zoned open space.

Ensure that designated open space areas within residential developments are landscaped and maintained.

#### Green Infrastructure - A Strategy for Fingal

KIO seek a 2 year timeframe from adoption rather than the duration of the Development plan for the Development and implementation of the Green Infrastructure Strategy, a number of named stakeholders to be included in Objective GI 09 and the inclusion of a green infrastructure strategy objective.

#### Green Infrastructure and Planning

KIO seeks an objective that requires all Land Use Plans protect, manage and where possible provide green infrastructure in an integrated and coherent manner to integrate green infrastructure into developments and ensure that they are cohesive with Green Infrastructure corridors linking adjoining lands.

#### Green Infrastructure Objectives for Local Area Plans and Development Proposals

The Department of Education and Skills request that schools are expressly exempt from the requirement of objective GI 31 for child safety and supervision reasons. It also requests that schools are expressly exempt from the requirement of GI 32 on the basis of the Department's adapted and recognised strategy for energy and water conservation. The Department is strongly of the view that all educational buildings should be specifically excluded from the requirement to use green roof technology.

There is no provision in the plan to provide a convenient cycling route between Castleknock and the Royal Canal cycle route. This submission links this statement with Objective GI 25, which states: *'Maximise the use and potential of existing parks, open space and recreational provision, both passive and active, by integrating existing facilities with proposals for new development and by seeking to upgrade existing facilities where appropriate.'*

# PART TWO

---

In Laurel Lodge Blanchardstown, there is a large green area, marked 'OS' on Sheet 13, with no facilities. This submission seeks that Objective GI 25 (quoted above) should be implemented here.

Silver Bridge also known as the Guinness or Farmleigh Bridge, Waterstown Park in Palmerstown to the north side tunnel connecting to Farmleigh estate in Castleknock, could serve as an access point for pedestrians to the Phoenix Park from Lucan and Palmerstown residents. It would open access to both parks along the Liffey and increase community usage. It could also be used as an alternative route as part of the Liffey greenway plan.

## **Other-Related Submissions**

Some submissions received are relevant to a number of chapters of the Draft Development Plan including this Chapter and are set out below.

Keep Ireland Open (KIO) submitted a lengthy submission, with many observations. Where applicable, these have been linked to the relevant sections as set in the foregoing sections above. However, they also seek a number of objectives that includes content across more than one section of this chapter and are therefore responded to in a grouped manner under the Chief Executive's Response of this section.

A submission from the Board of Management of Rush and Lusk Educate Together School (RaLET) seek recreational space for the school as it is located on a small site and lacks recreational facilities and highlights the need for the Council to deliver the full 'Lusk Recreational Hub/Lusk North Town Park'. This submission also seeks that the Development Plan must assure that the private developers in the adjacent residential housing zones are not allowed to encroach on any of the land set aside as green space.

Four separate submissions seek the inclusion in this Chapter of a specific 11 acre site at the Rush/Remount roundabout (located in Lusk) for sports development (class 1 open space).

Further submissions on site specific proposals include primarily, playing pitches (and ancillary issues such as parking and exclusive use for Skerries Harps) at Kelly's Bay Promenade, Barnageeragh Cove and Holmpatrick.

A separate submission provides detailed proposals for the Mill Pond Park in Balbriggan that include the following:

A request to rezone ME zoned lands to recreational use for the Ballymun Kickhams Club with relevant facilities.

A request to associate the upgrade of existing boxing facilities with a rezoning from 'OS' to 'RS' tied to a specific local objective that development of these lands is contingent on upgrading the existing Baldoyle boxing club and the provision of a multi-sports dressing room facility to serve the playing pitches at Seagrange Park at Lands at 'Brickfields', Baldoyle, Sheet 11 is sought.

## **Chief Executive's Response**

### **Background**

It is considered that the reference to the 2015 expansion of the UNESCO Biosphere in Dublin Bay should be included as it represents an update on current extents of the Biosphere. However, it is considered that Chapter 9, Natural Heritage, would be a more appropriate Chapter to insert

# PART TWO

---

this update as the Draft Development Plan contains a section on the Dublin Bay Biosphere Reserve in Chapter 9, Natural Heritage.

It is considered that the definition of Green Infrastructure (GI) as set out in the Draft Plan is comprehensive, captures the key principles of GI, and covers the issues as contained in the submission albeit worded differently.

## **Fingal's Green Infrastructure**

It is considered that objectives GI 01 & GI 02 are appropriately placed within section 8.2 Fingal's Green Infrastructure as they represent some of the key proposals for the management of existing green infrastructure and provision of new green infrastructure which is what this section sets out.

Zoned land within Fingal includes land zoned Open Space (*'to preserve and provide for open space and recreational amenities'*), which is identified on all relevant maps (Sheets 1 – 16), but in particular Sheet 14 – Green Infrastructure 1 map thus securing a dedicated use to such land. Open Space plays a key role in Fingal's Green Infrastructure and this chapter identifies Parks, Open Space and Recreation as one of five key Green Infrastructure themes. Objective GI 01 specifically addresses the retention of existing green open space within Fingal County. It should be noted that Fingal's approach to the rationale behind open space begins in Chapter 3, Place-making, where open space provision is based on five principles: Hierarchy, Accessibility, Quantity, and Quality and Private Open Space.

The Draft Development Plan supports the landscaping and maintenance of residential open space as designated open space associated with new residential development is required to comply with Development Management Standards, as set out within the Draft Development Plan, Chapter 12 under Objective DMS03, sixth bullet, which states: *'Outline detailed proposals for open space and ensure the provision of open space is designed in from the beginning when designing a new scheme.'* Equally, for existing established residential areas, designated open space associated with residential developments is a matter that is captured at 'taking in charge' stage and forms part of the Council's operations section, where the on-going maintenance of such open space is carried out by Council staff.

## **Green Infrastructure - A Strategy for Fingal**

It is the view that a two year timeframe for the development of a green infrastructure strategy with public consultation is considered reasonable. While the commitment made in the Draft Development plan is to have the strategy in place during the life of the Plan, it is the intention to commence the process as soon as is practicable, following adoption of the Development Plan.

A list of key stakeholders will be drawn up at the commencement of the process. It is considered that the lengthy green infrastructure strategy objective proposed contains what has been covered by objectives GI 09, GI 10, GI 11 & GI 16, as set out in the Draft Development Plan.

## **Green Infrastructure and Planning**

It is clear from the opening lines to Section 8.4 that the development process is the main vehicle used to give effect to Green Infrastructure planning. The proposed objective is considered to be covered in Objectives GI 17, GI 19, GI 20 & GI 21 of this section and all objectives (GI 23 – GI 35) of the following section 8.5 – Green Infrastructure Objectives for Local Area Plans and Development Proposals.

# PART TWO

## **Green Infrastructure Objectives for Local Area Plans and Development Proposals**

Planning exemptions, including those for schools, are generally found in the Planning & Development Regulations, as amended. It is considered that objectives GI 31 and GI 32, as contained in the Draft Development Plan, strive to achieve sustainable development across both natural and built environments. Planning applications are assessed on the basis of compliance with Development Plan objectives, where relevant.

The proposed cycle link is not in the NTA's proposed cycle network and from a review of the proposal submitted, it appears that the proposed cycle link passes through lands in the ownership of Irish Rail and other third parties. While this proposal may best be considered in the detailed design of the Royal Canal Cycle Route, objective GI 29, which states: *'Develop a Cycle/ Pedestrian Network Strategy for Fingal that encompasses the Fingal Way and other proposed routes which will be screened for Appropriate Assessment and Strategic Environment assessment.'*, would capture the feasibility of this proposal. GI 25 is a general objective that applies across the county. The allocation of resources to provide facilities is an ongoing objective for the Council. The decision making process on the allocation of funds includes proximity to similar facilities in order to provide as much of an even spread as possible.

Proposals to improving pedestrian and cycle links across the River Liffey and increasing accessibility of the Liffey Valley SAAO lands are welcomed. Further studies are required to establish whether Silver/ Guinness/ Farmleigh Bridge would be accessible from either the Fingal County or South Dublin County sides.

This bridge is a protected structure (no. 754). The Draft Development Plan contains a local objective no. 148 which states: *'Restore the Metal bridge on the Lower Road and utilise it as a strategic pedestrian /cycle link from Farmleigh car park to Waterstown Park via Coates land in co-operation with South Dublin County Council.'*

### **Other-Related Submissions**

The Lusk Recreational Hub is identified in the Draft Development Plan, in two specific areas, one on the sheets and the second within the written statement.

Sheet 14 – Green Infrastructure mapped objectives states: *"Provide for Active Recreation Hubs in Bremore Regional Park, St Catherines Park (Rush), Lusk, Donabate, Moorestown/Oldtown (Swords), Drinan, Baldoyle Racecourse Park and Phoenix Park Race course. [Emphasis added.]* Chapter 4 Urban Fingal, under Objective Lusk 6 states: *'Develop an active Recreational Hub to serve Lusk and the surrounding area.'* Therefore, it is considered that the Draft Development Plan addresses this issue. Similarly, the second issue raised under this submission is addressed in the Draft Development Plan, chapter 4 Urban Fingal with Objective Lusk 11, which identifies the North Lusk Masterplan MP6A which provides for three elements, one of which is relevant to this submission:

#### **North Lusk Masterplan**

*Ensure the preparation of the Masterplan facilitates the development of the lands for the development of a secondary school, community facilities, playing pitches, park land and residential Development to enable comprehensive Development of the lands in a proper manner and Development is phased accordingly to ensure Development of facilities occurs in tandem with the residential Development.* Together, these Draft Development Plan commitments are considered to address the issues relating to the RAlet submission and recreational activities, including sports areas in and around the Lusk area.

Chapter 4 deals with the urban area of Skerries and a number of objectives address recreational issues, as follows: Objective Skerries 5 states: *'Prepare a recreational strategy for open space lands*

## PART TWO

at Kellys Bay, Mourne View, and Skerries Rock.’ This objective includes a named area in the submission. Objective Skerries 8 states: *‘Prepare an Urban Framework Plan to guide and inform future Development of the harbour area incorporating mixed-use development including community/recreational and marina/ water sports facilities with improved accessibility including enhanced off-street car-parking.’*

Both of these objectives will provide the opportunity for the public and interested parties to participate in the location of recreational activities in Skerries. Masterplans for both Barnageeragh (see Map Sheet 5, MP 5.A) and Holmpatrick (see Map Sheet 5, MP 5.C), both named in the submission, are provided for in the Draft Development Plan. With respect to recent planning activity in the Barnageeragh area, the landscaping plans that include playing pitches are currently going through the transfer procedure from the Developer to Council.

On the ancillary matters pertaining to this submission, it should be noted that Objective PM53, (taken from Chapter 3 Place-making) which states: *‘Ensure intensive recreational/amenity facilities are not used exclusively by any one group.’*, provides the approach the Council has taken to efficient use of resources, where multi users will be encouraged to optimise use of a recreational resource. It is considered that parking and set down areas are a matter for the Operations Department of the Council.

A Part 8 Development was prepared earlier this year for a skateboard park at Mill Pond Park, Balbriggan. As part of the public advertising for this development, reference was made to a masterplan for the immediate area being undertaken by the Parks Department of Fingal County Council. This Masterplan will provide the opportunity for public participation and it is considered a more appropriate local level for which detailed proposals such as those contained in the submission can be considered. Notwithstanding the above, the Draft Development Plan under Chapter 4, Urban Fingal contains objectives relating to Balbriggan which include Objectives Balbriggan 10 & 11 which provide for the improvement of pedestrian and cycle facilities.

While the Draft Development Plan supports the use of recreational facilities for multi-users, it seeks to resist the exclusive use of facilities by one group (objective PM 53), under Chapter 4, Urban Fingal, Charlestown and Meakstown Development Plan objectives includes the following: Objective Charlestown and Meakstown 2: *‘Continue to improve and deliver enhanced community and recreation amenities to the area with particular emphasis on a community centre to provide for the community and sporting needs of the area including the provision of changing rooms if required and improvements to the quality of open space. [Emphasis added.] and Objective Charlestown and Meakstown 3, which provides for: *‘Continue to support and facilitate the established cross boundary forum, which includes Dublin City Council, to co-ordinate Development between Dublin City’s North West Area (which includes parts of Santry, Poppintree and Ballymun) and the adjoining areas in Fingal which include Santry, Meakstown and Charlestown and lands to the north of Ballymun.’**

With both of these objectives contained in the Draft Development Plan, it is considered that Fingal County Council can facilitate recreational needs on appropriately zoned lands whether within Fingal County Council administrative area or Dublin City Council’s administrative area.

The request to rezone land to residential tied with a request for a specific local objective regarding the Baldoyle boxing club is dealt with under Sheet 10.

KIO seek the inclusion of a number of additional objectives within the chapter.

The content of their submission is covered in the Draft Development Plan by objectives GI 04, GI 08, GI 13, GI 26, GI 27, GI 29, GI 33, GI 34, GI 35 & GI 105 along with the introductory section to

# PART TWO

---

the Chapter which includes the promotion of health and wellbeing. It is therefore considered that the Draft Development Plan has addressed the content of their proposed objectives.

## **Recommendation**

### **Background**

#### **CE CH 8.1**

Include the following in Chapter 9 Natural Heritage, section 9.4 Landscape, under heading Dublin Bay Biosphere Reserve, pg 318, as follows:

#### **Dublin Bay Biosphere Reserve**

Biosphere Reserves are places where nature and people connect. They are areas which are internationally recognised for their biological diversity yet also actively managed to promote a positive relationship between people and nature. The Dublin Bay Biosphere Reserve is a special designation awarded by the United Nations Educational, Scientific and Cultural Organisation (UNESCO). It is part of a global network of 651 Biosphere Reserves in 120 countries. *'In 2015 UNESCO expanded the North Bull Island Biosphere designation to include Dublin Bay, reflecting its significant environmental, economic, cultural and tourism importance. The Biosphere now extends to over 300 km<sup>2</sup>, with over 300,000 people live within the newly enlarged Biosphere.'* The Biosphere designation does not add or detract from the regulatory framework already in place for the Bay but is designed to assist stakeholders in finding sustainable solutions to the management of the Bay which ensure good outcomes for both people and nature. The Biosphere is managed by the Dublin Bay Biosphere Partnership which includes Fingal County Council, Dublin City Council, Dun Laoghaire-Rathdown County Council, Dublin Port Company, National Parks & Wildlife Service and local community groups and NGOs.

# PART TWO

## Chapter 9 - Natural Heritage

### Submissions Received Relevant to this Chapter

D00052 D00186 D00191 D00230 D00350 D00578 D00621 D00628 D00692 D00696

### Summary of Issues

#### General

The submission from the Department of Arts, Heritage and the Gaeltacht welcomes the strong protection given to the natural heritage in the draft Plan including proactive steps to protect biodiversity throughout the County. The Department have asked Fingal County Council to note that legislation underpinning this chapter of the development plan can be referenced as the 'Wildlife Acts 1976 to 2012'.

#### Background

One submission requests that the Development Plan should enshrine the objectives set out in the Fingal Heritage Plan and it needs to protect the natural environment and built heritage. Heritage and Biodiversity Officers should regularly visit schools at all levels to inform and educate students regarding Fingal; with later visits in the evening times to community centres for those who work during the day; advise people what to grow as hedges, trees etc.

Keep Ireland Open (KIO) seeks the rewording of the second opening paragraph.

#### Core Biodiversity Conservations Areas

The submission from the Department of Arts, Heritage and the Gaeltacht seeks the inclusion of one further designation the Codling Fault Zone marine SAC (site code 003015) under table BD01 (and added to Sheet 15 GI map 2 also.)

#### Ecological Buffer Zones

One submission requests additions to a Draft Development Plan objective for Baldoyle under chapter 4, Urban Fingal, County Council, as follows:

Objective Baldoyle: Maintain remaining green belt lands between Portmarnock and Baldoyle while providing appropriate recreational uses within Baldoyle Racecourse Park. *A much improved playground, picnic tables and a cycle track are required within the park all to be delivered through a programme of works over the lifetime of this Draft Plan in agreement with local residents.*

This specific issue of additional wording to a Draft Development Plan objective relates to Chapter 4 Urban Fingal, under Baldoyle. However, the submission also makes reference to the visual break between Baldoyle and Portmarnock (referenced in the above objective) and concerns on the protection of this greenbelt.

#### Nature Development Areas

One observation from a quarry owner requests that similar wording as found in the Fingal Biodiversity Action Plan 2010 – 2015 should be included in the draft Development plan and requests that that Milverton Quarry should be recognised as a quarry in the development plans maps.

#### Ecological Corridors and Stepping Stones Including Trees and Hedgerow

One observation from the Dublin Airport Authority request that the airport site is excluded from objective NH 22 which states: *'Protect rivers, streams, and other watercourses and maintain them in*

# PART TWO

---

*an open state capable of providing suitable habitat for fauna and flora including fish.*, on the basis that there is a requirement for aircraft to taxi between uninterrupted areas of apron.

A submission from the Ballyboughal Hedgerow Society seek retention of hedgerows and refer to specific locations and policies.

KIO seeks the repositioning of objectives NH 21, 22, 23, 25 & 27 to other areas of the Draft Development Plan. This submission also seeks the inclusion of three additional objectives relating to issues on elaborating on the resource and role that natural heritage is and plays, rural recreation associated with natural heritage and an expansive objective covering many varied topics including public access.

## **Geology**

One observation from KIO seeks the upgrade of text, relating to Geological Survey of Ireland (GSI) consultation on planning application, to objective status. It also seeks the inclusion of an objective which relates to the importance of geological heritage. It also seek the rewording of NH 28 and NH 29 with different wording and the addition of three further objectives relating to geology.

One observation from a quarry owner requests that additional text is inserted into Section 9.3 County Geological Sites which would indicate that the on-going operation of extractive industries is compatible with the protection and promotion of geological heritage.

## **Landscape**

KIO seek a number of additional paragraphs to be added to the landscape section of this chapter on Natural Heritage and information on Historic Landscape Characterisation.

## **Landscape Character Assessment Objectives**

One observation from a quarry owner requests additional text to objectives NH 33 and NH 34.

Observations from the KIO submission seek the repositioning of a number of Draft Plan Development Objectives, inclusion of additional objectives and the rewording of some objectives including the reiteration of public access through rural recreational developments.

## **Special Amenity Areas**

One submission requests the inclusion of an objective within the Draft Plan to review the boundary of the Liffey Valley SAAO during the lifetime of the current plan and to consider the removal of the subject lands identified in this submission particularly where they do not contribute to SAAO objectives and add new lands where they can contribute to such objectives.

KIO seek to include wording to promote the tourism potential of the Liffey Valley.

## **Dublin Bay Biosphere Reserve**

Fáilte Ireland seeks reference to the 2015 expansion of the UNESCO Biosphere in Dublin Bay. It is considered, however, that it would be more appropriate to insert in this Chapter, Natural Heritage, as it contains a section on the Dublin Bay Biosphere Reserve.

## **The Islands**

KIO seek additional wording to objective NH 47.

# PART TWO

---

## **The Coast**

With regard to SEA Submission notes amongst other things that key infrastructure projects within the Plan area over the lifetime of the Plan and beyond including facilitating Metro north, Metro West, Dublin Airport, port/harbour development proposals, coastal defences/managed retreat options as part of CFRAMS and also continuation of linking cycling/walking routes in coastal areas. While the Plan includes objectives which set the framework for these developments to be advanced, the Plan should also ensure that the potential for cumulative effects particularly on water quality, biodiversity and noise pollution should be taken into account. More detailed comments raised in the submission are dealt with in individual Sections/Chapters as appropriate and the SEA Environmental Report.

KIO seek additional wording within the introduction of this section.

## **Coastal Tourism and Recreation**

Failte Ireland seeks that Section 9.5 needs reference to coastal villages and protection of this important tourism resource.

KIO seek a number of rewording and additions to the objectives and paragraphs to this section of the chapter. These have been reviewed and it is considered that the Draft Development Plan has provided the appropriate level of policy for this topic with the wording of Objectives NH60 – NH 65 and the introductory paragraphs.

## **Chief Executive's Response**

### **General**

This is noted.

### **Background**

Fingal County Council has a very proactive Heritage section which includes Heritage, Conservation and Biodiversity officers together with a Heritage Network and Community Network Unit. Fingal's Biodiversity Plan contains a wealth of information on biodiversity in Fingal including sections that enable the public to get involved. The Biodiversity programme on Fingal County Council's website equally provides lots of information on specific projects. The Heritage Plan, the Heritage Forum and the Heritage Network provides a stream of information that facilitates and assists in the dissemination of Fingals' Heritage.

It is considered that two key objectives NH 02, which states:

*'Implement the Fingal Biodiversity Action Plan 2015 and any revisions thereof in partnership with all relevant stakeholders.'* and objective NH04, which states: *'Raise awareness in relation to biodiversity across the community.'* together with the networks, working on the ground, provides an organised, inclusive, proactive positive and progressive approach to biodiversity in the County.

The content of the rewording sought elaborates on the topics covered in the opening paragraph and it is captured in the Statement of Policy as provided for in the Draft Development Plan.

### **Core Biodiversity Conservations Areas**

This will be incorporated into chapter under Table BD01: Protected Areas of International and National Importance and inserted into Sheet 15 GI map 2. This additional SAC was signed on 24 February 2016 post the publication of the Draft Development Plan for Fingal County Council.

### **Ecological Buffer Zones**

# PART TWO

Sheet 14, Green Infrastructure 1, of the Draft Development Plan, identifies this area of greenbelt as an ecological buffer zone and in this Chapter 9, Natural Heritage, Ecological Buffer zones are discussed in detail with two linked objectives under section heading Biodiversity. NH 16 (*'Protect the functions of the ecological buffer zones and ensure proposals for development have no significant adverse impact on the habitats and species of interest located therein.'*) and NH 17 (*'Develop Ecological Masterplans for the Rogerstown, Malahide and Baldoyle Estuaries focusing on their ecological protection and that of their surrounding buffer zones'*), both provide specific and named protection for this area, identified in this submission. It is considered Chapter 9, Natural Heritage, has managed this issue of greenbelt appropriately in this Draft Development Plan.

## **Nature Development Areas**

The relevant section in the Draft Development Plan states the following:

*"These areas, which are referred to as 'nature development areas' are locations where nature conservation can be combined with existing activities such as farming, forestry, quarrying and recreation (e.g. golf courses.)"*. It is therefore considered that this wording is broadly consistent with the wording found in the Fingal Biodiversity Action Plan 2010 – 2015. The Draft Development Plan maps do not identify activities such as Farming, Forestry or Quarries, as a mapped activity. The quarries 'appear' mapped because they have been identified as nature development areas on the Green Infrastructure 2 Sheet 15.

## **Ecological Corridors and Stepping Stones Including Trees and Hedgerow**

All applications lodged with the planning authority are adjudicated on how they comply with the relevant development plan objectives, where they are applicable.

Within this assessment, during the development management process, an informed and evidenced based decision will be made predicated on the information provided by the applicant.

The hedgerow network throughout Fingal is recognised within the Draft Plan as a valuable natural resource for amenity, biodiversity and contribution to landscape character and includes a number of objectives for their protection and management. Objective NH25 in Chapter 9, Natural Heritage, which states: *'Protect existing woodlands, trees and hedgerows which are of amenity or biodiversity value and/or contribute to landscape character and ensure that proper provision is made for their protection and management.*, and RF56 (Chapter 5 Rural Fingal) which states: *'Ensure that the design of new dwellings have regard to the Development Management Standards Chapter with specific reference to the following; (b) Protect existing trees, hedgerows, townland boundaries and watercourses which are of amenity, historic or biodiversity value and ensure that proper provision is made for their protection and management in future development proposals.*, both reinforce the Council's approach to the protection of hedgerows throughout the county. Linear landscape features such as hedgerows are recognised for their biodiversity value as ecological corridors and the protection of their ecological function and integrity is made clear throughout the Draft Plan including Chapter 8, Green Infrastructure. The hedgerow resource forms part of the Green Infrastructure [GI] network of the County which is increasingly recognised as a vital component in building resilient communities capable of adapting to the consequences of climate change. Objective GI 02 seeks to develop the green infrastructure network to ensure the conservation and enhancement of biodiversity.

Re-positioning 5 no. Natural Heritage objectives to other parts of this chapter and other parts of the Development Plan is not considered appropriate. These objectives gather together the natural elements of ecological corridors and stepping stones in one place in the Draft Development Plan and demonstrate the wide ranging elements that comprise such biodiversity. It is considered that the additional objectives sought by KIO merely elaborate on objectives

# PART TWO

covered by this chapter and others in the Draft Development Plan particularly as tourism and public access issues as captured under ED55 which states:

*'Engage and collaborate with key stakeholders, relevant agencies, sectoral representatives and local communities to develop the tourism sector in Fingal and to ensure that the economic potential of the tourism sector is secured for the benefit of the local economy.'*, and ED59 which states:

*'Ensure the economic benefits associated with promoting the country's natural, cultural and built heritage are balanced with due consideration for their conservation and protection.'*, together with Objective RF103, which states:

*'Support sustainable tourism initiatives which develop the tourist potential of the rural area while recognising and enhancing the quality and values of the rural area'* and the five objectives (RF107, 108, 109, 110 & 111) associate with Public rights of way as set out in chapter 5 Rural Fingal.

## **Geology**

There is no need to upgrade text to objective status as Chapter 12, Development Management Standards, under Objective DMS17 states: *'Consult with the Geological Survey of Ireland when considering undertaking, approving or authorising developments which are likely to affect County Geological Sites.'* The opening paragraph and two objectives NH28 and NH29 of the Draft Development Plan deal with the issue of Council recognition of geological heritage sites.

This Draft Development Plan maps and names 21 County Geological Sites in Fingal, which are stated in the Draft Development Plan to be important geological heritage sites. The elaborate wording suggested for NH 28 and NH 29 is not considered appropriate. It is considered that consultation with the GSI will provide the level of examination and overview as required.

The Draft Development Plan in Chapter 9, Natural Heritage provides for the following text: *'The Council will consult the Geological Survey of Ireland when considering undertaking, approving or authorising developments which are likely to affect County Geological Sites.'*

It is considered that consultation with the relevant expertise in this area, which in this instance, is the Geological Survey of Ireland on a case by case basis when planning applications are received by the Council is the appropriate method of dealing with issues involving activities located on Geological sites.

## **Landscape**

All proposed text changes have been reviewed and generally it is considered that all main items have been covered in the Draft Development Plan objectives from NH 30 – NH 37 and thus have been addressed appropriately. Information regarding Historic Landscape Characterisation is provided for under that heading and considered appropriate.

### **Landscape Character Assessment Objectives**

Both of these objectives NH 33 and NH 34 relate to areas located on what is classified as highly sensitive landscapes which includes the High Lying, Estuary, Coastal and River Valley and Canal Type landscape character types, all as set out in Table LC01. Sensitive areas require sensitive design with minimal impacts. The Council has provided 11 Principles for Development associated with development in these Highly Sensitive Character Types landscapes, which provides guidance to future applicants. This is considered a reasonable approach.

It is considered that the eleven objectives (NH30 – NH 40) of the Draft Development Plan associated with the landscape section provides sufficient information, guidance and direction on the many topics the Draft Development Plan has identified under the issue of landscape

# PART TWO

---

encompassing Landscape Character Assessment, Landscape Sensitivity and the sets of principles of development set out for such classifications, views and prospects and Historic Landscapes.

## **Special Amenity Areas**

There are 4 no. specific objectives (NH 41, 42, 43, & 44) relating to the Special Amenity Areas (SAA) associated with the two Special Amenity Area Orders (SAAO) in Fingal County Council, one of which covers the Liffey Valley, the other being Howth. The Liffey Valley Order was confirmed by the Minister for the Environment on the 8th March 1990. The Development Plan is the vehicle with which to implement the Order. The area of the Liffey Valley Special Amenity Area Order is jointly managed between Fingal County Council and South Dublin County Council. This Draft Development Plan specifically seeks to re-energise the Liffey Valley SAA project with the provision of objective NH42, which states: *'Re-establish the management committee for the Liffey Valley Special Amenity Area with an annual programme of quarterly meetings in partnership with South Dublin County Council on an ongoing basis and develop a five year works programme as part of the implementation plan for the SAA within two years of the adoption of this Development Plan.'* and to further progress the project to encompass Objective NH 44 which states: *Co-operate with Government and the adjoining local authorities in seeking to establish a Liffey Valley Regional Park.'* together with objective NH43 which seeks to re-establishing of the Liffey Valley Special Amenity Area management committee.

The strategic trails/bridges, as set out under the Order itself for the Liffey Valley, and as identified in Chapter 6, Economic Development under the Tourism sector, Recreational Trails Network, accounts for this issue within the appropriate chapter.

## **Dublin Bay Biosphere Reserve**

The inclusion of this reference is considered appropriate as it represents an update on current extents of the Biosphere. It can be included within the text, after third sentence.

## **The Islands**

The existing wording to this objective is considered appropriate.

## **The Coast**

The EPA submission referenced the SEA and mitigation measures therein. Associated with Chapter 9, Natural Heritage, there are changes to 4 no. objectives (NH 17 – ecological masterplans for Rogerstown, Malahide, and Baldoyle Estuaries NH42 – inclusion of South Dublin County Council relating to the Liffey Valley SAAO, NH 50 – coastal defences and NH 51 - coastal retreat management). These were incorporated into the Draft Development Plan, as agreed with the EPA. With respect to the cumulative impacts on biodiversity in relation to linking cycle walking routes to coastal areas, the wording in Objectives NH60, NH61 and NH62 include for the need to protect, conserve and enhance the natural and cultural heritage of the coast. Additionally, Objective NH59, relating to a coastal monitoring programme and Objective NH55 which relates to the development of a coastal erosion policy will play a significant role in capturing any issues in relation to cumulative effects on biodiversity.

The wording of the introduction section to the coast is considered appropriate.

## **Coastal Tourism and Recreation**

Chapter 9 specifically deals with Natural Heritage in Fingal, with section 9.5 dealing specifically with the natural environment of the coast. Chapter 6, Economic Development, of this draft development plan under Section 6.9 Tourism Sector, deals with the tourist aspect of Fingal, referencing the Fingal Tourism Strategy, which under Section 4.1 deals with coastal villages and

# PART TWO

---

coastal tourism. Also within Chapter 6 of this draft development Plan under heading Recreational Trails Network the Fingal Coastal Way is classified as one of three strategic trails to be completed in the County. As the coastal spine linking the urban areas of Howth to Balbriggan, the envisaged Recreational Trails Plan to be prepared by Fingal County Council will include key stakeholders. Fáilte Ireland is a named stakeholder in this regard. A number of key objectives are set out to achieve this, namely ED06 to establish a committee, and ED64 to prepare the plan. The programmed planning involved in the success of The Fingal Coastal Way will provide an opportunity to raise outstanding issues or develop the tourism product associated with the necklace of coastal villages and towns of Fingal that will 'joined up' by the completion of the Fingal Coast Way.

## **Recommendation:**

### **General**

#### **CE CH 9.1**

To insert 'Wildlife Acts 1976 to 2012' within the chapter, as required.

#### **CE CH 9.2**

##### **Core Biodiversity Conservations Areas**

Insert Codling Fault Zone marine SAC into Table BD01: Protected Areas of International and National Importance with an asterisk that states 'This area is not mapped on Green infrastructure 2 sheet 15 owing to the 24 km distance from shore but can be reviewed in SI 99 of 2016, 24 February 2016, as a map is attached. See [www.npws.ie](http://www.npws.ie).

#### **CE CH 9.3**

##### **Dublin Bay Biosphere Reserve**

To insert additional text under heading Dublin Bay Biosphere Reserve, after third sentence, as follows:

Biosphere Reserves are places where nature and people connect. They are areas which are internationally recognised for their biological diversity yet also actively managed to promote a positive relationship between people and nature. The Dublin Bay Biosphere Reserve is a special designation awarded by the United Nations Educational, Scientific and Cultural Organisation (UNESCO). It is part of a global network of 651 Biosphere Reserves in 120 countries. *'In 2015 UNESCO expanded the North Bull Island Biosphere designation to include Dublin Bay, reflecting its significant environmental, economic, cultural and tourism importance. The Biosphere now extends to over 300 km<sup>2</sup>, with over 300,000 people live within the newly enlarged Biosphere.'* The Biosphere designation does not add or detract from the regulatory framework already in place for the Bay but is designed to assist stakeholders in finding sustainable solutions to the management of the Bay which ensure good outcomes for both people and nature.

# PART TWO

## Chapter 10 –Cultural Heritage

### Submissions Received Relevant to this Chapter

D00003 D00029 D00040 D00172 D00186 D00233 D00236 D00324 D00337 D00404 D00425  
D00519 D00530 D00547 D00583 D00621 D00692 D00725 D00732

### Summary of Issues Raised

#### Background

The Department of Arts, Heritage, & the Gaeltacht (DAGH) seek that Bat species are considered under the built heritage sections of the Development plan, noting that that this issue has been recommended in the Natura Impact Report (NIR).

The inclusion of text within this section should be consistent with chapter 9, Natural Heritage under heading '*Rare and Protected Species and their Habitats*' and Objective DMS 160, Chapter Development Management Standards.

KIO seek to maintain the existing wording of the Statement of Policy in the current Fingal Country Council Development Plan. It also seeks additional objectives relating to the Fingal Heritage Plan including an objective to include the main aims of the Fingal Heritage Plan, to review the plan, to implement the Plan and continue to employ a Heritage officer.

#### Archaeological Heritage

##### Protection of the Archaeological Resource

KIO make a number of suggestions for additions to this section of Chapter 10 in the Draft Development Plan. These have been reviewed. It requests the inclusion of additional paragraphs, which relate to the National Monuments Acts 1930 – 2004, the 1999 Departmental Guidelines and seeks the repositioning of historic burial grounds from objective CH 03 to CH 02.

##### Development of the Archaeological Resource

KIO seek the re-drafting of Objectives CH 05 and CH 06 with lengthy detailed inclusions. These have been reviewed. It is considered that the introductory paragraph to this section and both objectives CH 05 and CH 06 set out clearly, in a succinct manner, what is required from a future applicant.

##### Awareness and the Archaeological Resource

Fáilte Ireland seeks an amendment to the text of Objective CH16, (based on its restrictive nature which may inhibit the Development of a good range of innovative products and approaches) as follows: *Support the growth of cultural tourism in the county, including the potential for niche heritage-based tourism products by facilitating the Development ~~of~~ including but not limited to heritage events, infrastructure such as heritage trails, walkways and cycleways, etc. and activities such as community excavation."*

Three separate submissions relate to St Cronans Well seeking protection of it as part of the Oldtown / Mooretown LAP, its conservation and protection and awareness of it within a local heritage context.

KIO requested in excess of twenty five additional paragraphs be inserted under this section.

The topics covered repeat some of the earlier issues, such as content of planning application involving archaeological material, consultation with relevant prescribed bodies during the planning process, guidelines to follow and general guidance on types of development in an

# PART TWO

around archaeological finds. Among the issues included reference to public access to archaeological resources and public right of way.

## **Architectural Heritage**

### **Record of Protected Structures (RPS)**

A submission requests that the Silver Bridge also known as the Guinness or Farmleigh Bridge, Waterstown Park in Palmerstown to the north side tunnel connecting to Farmleigh estate in Castleknock, should be repaired. It's part of Irish heritage. The bridge is currently in the ownership of Fingal County Council.

A submission relating to lands at Beech Park House, Clonsilla requests that Objective CH21 of the Draft Fingal Development Plan 2017-2023 be amended as follows: *'Encourage the sympathetic and appropriate reuse, rehabilitation and retention of Protected Structures and their grounds including public access seeking that the Protected Structure is conserved to a high standard, and the special interest, character and setting of the building preserved. In certain cases the relaxation of site zoning restrictions **and Development of ancillary buildings and uses** may be considered in order to secure the preservation and conservation of the Protected Structure where the use proposed is compatible with the existing structure and this will only be permitted where the Development is consistent with conservation policies and the proper planning and sustainable Development of the area.'*

And / or that the following local objective be included in the Fingal Development Plan 2017-2023 as follows:

*'Provide for a suitably scaled integrated tourism and recuperative centre at Beech Park House, with a number of buildings for ancillary directly related uses. The nature and extent of the use and ancillary uses and facilities shall be determined primarily by the need to conserve the house, lodge and courtyard and their surroundings, which are of major architectural importance, and the special landscape character and heritage features of the lands.'*

These objectives are sought to facilitate the conservation of Beechpark House to a Rejuvenation Centre and to provide ancillary accommodation on the grounds.

Consideration to be given to Number 38-40 North Street, Swords as Protected Structures given that they were built c1890. (This observation was part of a submission that also sought an ACA designation within the North Street Swords area.)

The HSE seeks an amendment to word Objective CH 22 to more fully encapsulate all possible future requirements that may not have been anticipated at the time of the preparation of the St Ita's Feasibility Study in 2013.

### **Architectural Conservation Areas (ACA)**

There are three separate submissions seeking 3 no. ACA designations under the Draft Development plan. These three locations are at:

#### ***Blanchardstown Village***

Designate Church Avenue as an ACA as the Cottages and the building which houses the Thai Garden (former St Brigid's Seminary) and the recently restored Parochial House (Cunninghams) are important to the environment of the Protected Structure (St Brigid's Parish Church).

#### ***Clonsilla***

Creation of an Architectural Conservation Area in order to protect and enhance the area in the vicinity of Clonsilla Railway Station and the protected structures (St. Mary's Church of Ireland, Callaghan Bridge, Clonsilla Signal House and Overbridge, Ring Barrows) and the large number of houses on the Clonsilla Road defined as character houses (Clonsilla Urban Centre Strategy- May 2008). and

# PART TWO

---

## **North Street Swords** (encompassing Swords Castle).

There is one submission seeking the deletion of an ACA at Old Portmarnock (Drimnigh Road), sheet 9, as it contends that the proposed ACA does not comply with criteria for proposing an ACA.

One submission calls for the protection of buildings on Main Street Balbriggan under an ACA designation.

One submission seeks that innovative design solutions should be considered within or adjoining an ACA where they positively contribute to the character of an area.

A submission relating to lands that are mapped as an ACA at Abbeville Demense and identified in this draft Development Plan in Chapter 10 under Table 10.1 Architectural Conservation Areas in Fingal requests that the entire Abbeville Demesne as outlined in yellow on an attaching map be designated as an Integrated Tourism and Recreation area on the relevant zoning map and to include a number of objectives relating to the development of specific uses on these lands. See submission for list of objectives.

One substantial submission on Lusk raises a number of observations relating to the promotion of tourism facilities highlighting the Katie Hunt site as of critical importance in the Development of a new tourism focus for Lusk. The submission highlights historic architectural resources to be sensitively addressed and linking them to the tourism product. The submission also highlights the need for an ACA designation in Lusk and an amendment to Objective Lusk 8 which seeks to delete the reference to re-thatch.

## **Historic Building Stock and Vernacular Heritage**

One submission requests that Fingal County Council take ownership of the derelict dwellings on Main Street, Rush and provide a park or carpark.

## **Industrial Heritage**

One submission was received that related to Objective CH 41, the natural and built heritage of the Royal Canal, and sought that re-consideration was given to the existing proposal to locate the proposed Greenway on the existing tow/walking path to the south of the canal at the pinch point area, identified as the Castleknock/Carpenterstown 'Pinch Point' would be most destructive to the landforms and natural habitats where the Deep Sinking represents a unique snapshot of historical engineering and heritage. The submission seeks to look at option(s) of locating the Greenway to the north of the canal at the pinch point, with the possibility of developing a linear park.

## **Language Heritage**

There was one submission with two observations regarding the new section entitled Language Heritage in the Draft Development plan. The proposal sought an objective to include a specific objective relating to an Irish Language Cultural Centre for the Dublin 15 area and for an Irish Language officer.

## **Chief Executive's Response**

### **Background**

The DAGH's advices on the inclusion of the Bat species within the built heritage will be incorporated into the written statement in the interests of rare and protected species and their habitats.

# PART TWO

The Statement of Policy in the Draft Development Plan is a robust and comprehensive statement that sets out the Council's commitments on Cultural Heritage over the next six years referencing the actions and objectives of the Heritage Plan as a tool to raise the profile and awareness of Fingal's Heritage. It is a strong statement reflecting the Development of Cultural Heritage as a policy issue within the Development Plan.

## Archaeological Heritage

### Protection of the Archaeological Resource

It is considered that the opening paragraph of this section provides a succinct introduction to the legislation governing this aspect of Cultural Heritage. Additionally, Objective CH 03 refers to the conservation principles and best practise guidelines. Historic burial grounds are considered appropriately located under objective CH 03.

### Development of the Archaeological Resource

Further detail on the content of archaeological impact assessments and methods statement are provided for in Chapter 12, Development Management Standards, under Section 12.11 with specific reference to Objective DMS153. The Development Management process itself provides for consultation with the prescribed bodies where their advices are considered an integral part of the decision making process. The Draft Development Plan itself provides overlapping protective measures for Fingal's Heritage that includes the archaeological resource of the County. Chapter 8 Green Infrastructure identified Archaeological and Architectural Heritage as one of a number of themes under section 8.5 Green Infrastructure Objectives for Local Area Plans and development proposals, thereby enshrining heritage as part of the design of any future development. The Fingal Heritage Plan demonstrates Fingal's commitment to ensuring that Heritage, including the archaeological resource forms an important part of Fingal's future development. Fingal County Council has established a good working relationship with the Departments Archaeologist for the Fingal area over the past number of years.

### Awareness and the Archaeological Resource

It is considered that the wording of objective CH16 is open and flexible in the first part of objective where it states *Support the growth of cultural tourism....* and then the objective becomes specific to niche heritage based tourism issues.

General tourism issues are found in Chapter 6, section 6.9 Tourism.

St Cronans Holy Well is protected under legislation, both as a Protected Structure no. 370 and a Recorded Monument, DU011 - 018, with each recorded in Appendices 2 & 3 respectively, that accompany the Draft Development plan. It is also marked on sheet 8, Swords, located on lands identified for the Oldtown/Mooretown LAP, 8C.

Local Area Plans are discussed in Chapter 11 land use zoning objectives, under section 11.2 but the following is of relevance to these submissions. It states:

*'Providing for the implementation of the Council 's objective in relation to Green Infrastructure which seeks to address provision for biodiversity, parks and open space, sustainable water management, landscape character, and architectural and **archaeological heritage** in a coherent and integrated manner.'* [**Emphasis added.**] Allied to the above, two objectives in Chapter 10, Cultural Heritage of the Draft Development Plan further support the issues raised in this submission.

Objective CH14 of the Draft Development Plan states:

*'Raise awareness of the cultural heritage and improve legibility by providing appropriate signage or interpretation in areas, sites, villages, and buildings of archaeological and historic significance.'*

Objective CH09

# PART TWO

*'Develop a policy in relation to the treatment of archaeological monuments within open space of Development s. A different designation from that of open space will be applied where sub-surface archaeological remains are incorporated to differentiate the area.'*

It is therefore considered that the highest available protection has been afforded St Cronans Well in the Draft Development Plan and it will be incorporated within the LAP in a coherent and integrated manner. Any LAP prepared must comply with Section 28 Guidelines Local Area Plan Guidelines 2013 which enshrines the need to address Heritage within the Plan as an integral part of any proposals for the lands.

All text has been reviewed and it is considered that the topics, described in detail by KIO have been incorporated within the main body of this section of the Chapter, with the supporting Objectives CH 11, CH 12, CH13, CH 14, CH 15, CH 16 and CH 17 and taken together with the content of Chapter 12, Development Management Standards, section 12.11 Archaeological and Architectural Heritage provide a robust, comprehensive and archaeology-friendly statutory planning framework within which to work with. Recorded Monuments are captured under Appendix 3, of the Draft Development Plan and mapped on the relevant sheets of maps pertaining to the county thereby providing all relevant information on archaeology material in accordance with legislative requirements. Historic Graveyards are mapped on Sheet 14 - Green Infrastructure 1 of the Draft Development Plan maps and referenced specifically under Objective CH 03.

## **Record of Protected Structures (RPS)**

This bridge, traversing the River Liffey, is a Protected Structure (no. 754) recorded under Appendix 2 of the Draft Development plan. The Draft Development Plan contains a local objective no. 148, identified on sheet 13. It is set out under Appendix 6 Map Based Local Objectives, which states: *'Restore the Metal Bridge on the Lower Road and utilise it as a strategic pedestrian/cycle link from Farmleigh public car park to Waterstown Park via Coates lands in co-operation with South Dublin County Council.'* This objective has been in place since 2011, under objective 651, with similar wording.

The underlying rationale behind the relaxation of site zoning restrictions in Objective CH 21 relates to the protected structures on a site. It is for the betterment of the existing protected structures on a site. This objective, only in certain circumstances, affords a level of flexibility on a future use for the existing protected structures on a site to ensure preservation and conservation of the existing protected structures on its attendant grounds. Chapter 6, under heading Integrated Tourism Complexes, Objective ED68 in the Draft Development Plan states: *'Facilitate, where appropriate, the conversion of former demesnes and estates and their outbuildings into integrated tourist, leisure and recreational complex type developments subject to architectural conservation best practice and proper planning and sustainable Development.'* It is considered that under this Draft Development Plan objective, individual proposals, at specific site locations, can be judged on their merits under the Development Management process.

Permission to demolish a one storey building at no 38 North Street Swords is currently with Fingal County Council. The final grant had not issued at the time of writing. The initial grant included conditions seeking protection of no. 40 North Street Swords during the demolition works of no. 38. This application is phase 1 of a larger re development proposal and has been assessed by the relevant expertise of the Council's planning team.

The wording of Objective CH 22, relating to St Ita's, Portrue, as found in the draft Development Plan is considered to provide the appropriate level of protection to these lands, current uses and

## PART TWO

future uses reflecting the nature and extents of this group of buildings on this landscape which includes protected structures, an ACA on High Amenity lands.

### **Architectural Conservation Areas (ACA)**

The Draft Development Plan under Objective CH28 states: *'Identify any potential new ACAs and evaluate and modify existing ACAs where necessary during the lifetime of the Plan.'* The Council will review the merits of the 3 no. proposed ACAs, over the life of this Development Plan under the above objective. With respect to the potential Blanchardstown ACA, it should be noted in Chapter 4, Objective Blanchardstown 1 states: *'Prepare an Urban Framework Plan for Blanchardstown Village to guide and inform future Development to include improvements to the Village streetscape and environment through appropriate high quality infill Development not exceeding three storeys; retain the historic streetscape by ensuring the conservation of traditional buildings; enhance levels of public lighting and supervision and provide a central public space.'* *[Emphasis added.]*

The ACA centred around Old Portmarnock has been created to offer a level of protection to a number of historic buildings in the area, many of which are built using brick from the Portmarnock Brick and Terracota Works established in late 19<sup>th</sup> century by the Plunkett family, including Hillsdene, Shellmartin (St. John's), Banff, Dunkeld, The Cottage, Plunkett Cottages. Portmarnock Brickworks was an important Irish manufacturer of brick and terracotta during the Victorian period, with its products used by many of the most significant architects of the time. It supplied much of the brick used in St. Ita's Hospital, Portrane (the former Portrane Asylum) and in the Red Stables at St. Anne's Raheny. The brickworks (which are no longer in existence) were sited just to the east of the boundary of the proposed ACA and as a result many of the surrounding historic buildings used Portmarnock brick in their construction and also have ties to the Plunkett family. Hillsdene is potentially the first house built of Portmarnock Brick by Luke Plunkett and one of three "dowry" houses for his daughters. Plunkett Cottages were occupied by families who worked for the Plunketts. These connections with these buildings of technical, historical and artistic significance. The designation of the ACA is primarily focused of the Portmarnock Brick buildings but also extends to include other historic buildings within the area that were in existence prior to brickworks and so are of architectural significance, such as Breahig and Drumnigh House which are marked on John Taylor's map of Dublin from 1816 as Merlin and Drumnigh Lodge. From the foregoing, it is considered that the inclusion of this ACA in the Draft Development Plan is warranted.

A review of the location of these buildings indicates that these buildings are included within one of two ACAs for Balbriggan, see sheet 4 and Table 10.1 Architectural Conservation Areas in Fingal, Balbriggan Historic Town Core.

The issue of innovative design solutions is captured within Chapter 12, Development Management Standards, of the Draft Development Plan under objective DMS157, which states: *'Ensure that any new Development or alteration of a building within or adjoining an ACA positively enhances the character of the area and is appropriate in terms of the proposed design, including: scale, mass, height, proportions, density, layout, materials, plot ratio, and building lines.'*

It is considered that this is considered appropriate.

Abbeville Demense is one of four named locations captured in the Draft Development Plan under the heading Integrated Tourism Complexes as found under Chapter 6, Economic Development. The nature and extents of uses considered appropriate for each location has been set out under this heading. The description provided on Abbeville Demense under chapter 6 highlights the conservation of the house and its surrounding which are considered of major

## PART TWO

architectural importance and the special landscape character and heritage features of the demesne. This is consistent with the designation of the ACA as mapped on sheet 9 and identified in Table 10.1 Architectural Conservation Areas in Fingal in this chapter 10, Cultural Heritage.

Chapter 4, Urban Fingal, sets out 11 no. objectives for the Lusk area which encompasses many of the issues raised in the above submission. In particular, Objective Lusk 1 which states: *'Protect and conserve the special character of the historic core of Lusk including the area of archaeological potential in the centre of the Town having regard to the physical and social character of the core area particularly in the vicinity of St. MacCullin's Church and Main Street, and to promote a conservation-led approach to the consolidation and redevelopment of the town core.'* Of relevance to this submission is also Objective Lusk 3, which states:

*'Prepare an Urban Framework Plan as required to guide and inform the future development of the centre of Lusk and in particular ensure that future development inter alia includes:*

*Protects and enhances the setting of St. MacCullin's Church, Round Tower and Graveyard including its openness from inappropriate development.*

*Provides for a small car park facility to serve St. MacCullin's Church.*

*Promotes and facilitates open space proposals which would significantly contribute to the openness and historic character of the Inner and Outer Core Areas of Lusk.*

*Ensure that all new developments respect the historic character of the Inner and Outer Core Areas of Lusk.'* The preparation of the Urban Design Framework, under objective Lusk 3 above, will capture many of the issues raised in the submission. The Urban Design Framework and public consultation associated with same will provide the most appropriate planning mechanism to assess detailed proposals such as the Katie Hunt site. In addition to the above, Chapter 3, Place-making, under Objective PM 21 provides for the following - *'Prepare Public Realm Strategies, where appropriate, liaising closely with residents and other relevant stakeholders.'*

Lusk Town has an ACA designation, as captured in Table 10.1 Architectural Conservation Areas in Fingal and mapped on sheet 6 of the Draft Development Plan. Objective CH37 of this chapter Cultural Heritage provides for the following: *'Commission a study on the thatched buildings of Fingal to examine how to ensure their continued survival.'*

### **Historic Building Stock and Vernacular Heritage**

This submission crosses many chapters in the Draft Development Plan including Chapter 3 Place-making and a specific objective relating to Rush under Chapter 4 Urban Fingal. Under objective PM 19, which states: *'Implement the provisions of the Derelict Sites Act including listing sites on the Derelict Sites Register and imposing Derelict sites Levy'*, the Draft Development Plan provides for buildings that are considered derelict and how the Council will manage this building stock. However, under objective CH 31 of this Chapter 10, Cultural Heritage, the Draft Development Plan also seeks to *'promote the sympathetic maintenance, adaption and re-use of the historic building stock and encourage the retention of the original fabric such as windows, doors, wall renders, roof coverings, shopfronts, pub fronts and other significant features of historic buildings, whether protected or not.'*

In Chapter 4, Urban Fingal, under Objective Rush 3, it states: *'Prepare an Urban Framework Plan to guide and inform future Development to include promoting permeability and accessibility within the town centre; provide design guidance for addressing potential infill Development sites, and provide measures to assist with the regeneration of the harbour.'* This specific objective provides a vehicle to which such buildings as described in the submission can be assessed for their future inclusion or otherwise in the development of Rush. As provided for within Chapter 3, Place-making, it states: *'Urban framework Plans will be developed in consultation with local communities, landowners and*

# PART TWO

---

*other relevant stakeholders, before being presented to the Elected members of the planning Authority.*, thus providing an opportunity for the public to have their say. It is therefore considered that the Draft Development Plan adequately addresses the situation on the ground.

## **Industrial Heritage**

The Development Plan process is not the appropriate mechanism to discuss the design details of the Royal Canal Greenway. A feasibility Study was conducted in 2012.

The Part 8 process will be used to further the project and a submission or observation in relation to the proposed Development, dealing with the proper planning and sustainable Development of the area in which the Development would be situated may be made in writing at this stage.

## **Language Heritage**

The inclusion of section 10.4 Language Heritage is new to the Development Plan for Fingal County Council and the 6 no. objectives provided for in the Draft Development Plan acknowledge, promote and support the Irish language. In particular, Objective CH50 states: *'Highlight the profile of the Irish language in the urban and rural environment and support the Irish language by facilitating the provision of Irish Language facilities.'* A proposal to develop an Irish Language Cultural Centre within the County can be progressed under the Development management process. The Council have recently secured a position for an Irish Language Officer.

## **Recommendation:**

### **CE CH 10.1**

#### **Background**

Amend Objective DMS152 to include reference to bats as follows:

A site assessment should be carried out prior to starting any design work to help inform and direct the layout, form and architectural treatment of the proposed development and identify issues that may need to be avoided, mitigated or require sensitive design and professional expertise. The site assessment should evaluate:

- Character of the site in its setting (including existing buildings)
- Access to the site
- Services
- Protected Designations
- *Rare and protected species (such as bats)*

# PART TWO

## Chapter 11 – Land Use Zoning Objectives

### Submissions Received Relevant to this Chapter

D00060, D00383, D00408, D00411, D00427, D00435, D00441, D00443, D00445, D00452, D00453, D00474, D00488, D00490, D00500, D00515, D00521, D00522, D00543, D00545, D00556, D00558, D00572, D00582, D00585, D00605, D00606, D00638, D00639, D00654, D00705, D00708, D00768, D00814.

### Issues Raised

#### Non-Conforming Uses

Two submissions were received in respect of Section 11.5 of the draft Development Plan.

One requests the removal of the following wording within Section 11.5: 'within the existing curtilage of the development' as this wording does not form part of the corresponding objective (Objective Z05).

The second submission, from Glasnevin Trust, requests that Section 11.5 be amended to include a more restrictive approach to existing sensitive non-conforming uses. This submission refers in particular to Dardistown cemetery which is adjacent to GE zoned lands. The GE lands have a number of residents located here and it is considered that non-conforming land uses on 'GE' zoned lands such as residential development could compromise the overall future development of such areas. Rewording of this Section and the corresponding objective has been submitted.

#### Zoning Objectives, Vision and Use Classes

Submission seeks a Third Category within the Land Use Zoning Objectives to be called 'Open For Consideration'

The Department of Education requests the Council consider the inclusion of a specific school/education land use zoning objective in the Draft Plan.

Identify a new zoning objective to support and facilitate the development of hotel and other tourist accommodation uses, having regard to Section 6.9 (Tourism) and related policies/objectives for hotels.

A number of submissions seek amendments to the permitted and not permitted uses of the different zoning objectives and at specific locations:

- Include 'hotel' as a Permitted Use on lands zoned objective HT at River Road (former Total Fitness site), Blanchardstown.
- Remove the following from the 'not permitted' use classes associated with zoning objective RW Retail warehousing: fast food outlet/ takeaway; retail convenience and remove the restriction superscript 23 from Restaurant /Café in the 'Permitted in Principle' use classes related to zoning objective RW Retail warehousing
- Note 16, associated with the table, and which states "Food Park related only" be altered to "Food park related "
- Remove waste disposal and recovery from uses permitted in principle from GE lands at Santry Business Parkas such a use would be incompatible with existing established uses on site.
- Request that Retail Supermarket ≤ 2,500 sq m net floor area is "Permitted in Principle" in the RS, GE, HT and RW zoning objectives. Failing that, it should be omitted from the "Not Permitted" category.

# PART TWO

- 'Retail - Local <150 sq m nfa' should be amended to include: 'includes retail banking functions of 150 sq m nfa that serve local business and the local working population within the Objectives 'GE', 'HT' and 'MEC'.
- Rural (RU) and/or greenbelt (GB) zoned land do not exclude a place of public worship as a use (assumption that horticultural and agricultural aspect of proposal would be automatically included in this).
- Amend the 'FP' Food Park in relation to 'open for consideration' to include the wording 'a single industry that requires a stand-alone rural location by virtue of its activities'.
- Under proposed GE zoning Boarding Kennels are expressly 'not permitted' and under existing 'RU' land use states that boarding kennels are permissible in principle, albeit subject to being provided ancillary to the main house. Submission seeks to amend the proposed GE zoning where Boarding Kennels are expressly 'not permitted' to where land use zoning objectives and permissible uses for 'General Employment' is modified to reflect the existing and established land uses, and that it either:
  - expressly permits in principle, the use of boarding kennels within the GE land use zoning; or
  - (ii) expressly state that boarding kennels are 'open for consideration' within the GE land use zoning
- Amendment to zoning objective 'DA' to allow for Waste Disposal & Recovery Facility (High Impact) to be a permitted use or to insert a proviso to this 'DA' zoning objective to allow for the continuation / expansion of existing non-conforming uses within the DA zoning Objective.
- Include 'rural tourism' as a permitted use under the 'RU' and 'HA' land use zonings. "Recreation Facility/Sports Club" (currently 'Open for Consideration') be included as 'Permitted' in the 'HA' zoning matrix/table.
- Permitted in principle uses for the ME - Metro Economic Corridor include provision for retail
- Lack of clarity regarding most appropriate location of facilities for end of life vehicles within land use zoning classification - see page 2 / 3 of submission
- A substantial submission submitted requested a new definition and use class for a Membership Warehouse Club
  - Amend GE and WD zoning to facilitate Membership Warehouse Club use. A local objective can confine the use to a particular location if considered necessary. Alternatively, it is requested that a new zoning category is introduced to the Development Plan to cater for Membership Warehouse Clubs.
  - Review the 'Retail - Warehouse Club' use in the context of what is 'Permitted in Principle' and 'Not Permitted' for all Land Use zoning objectives in the Draft Plan

## **Chief Executive's Response**

### **Non-Conforming Uses**

The removal of the proposed wording is acceptable.

Objective Z05 recognises the need to accommodate non-conforming uses in a reasonable manner. These uses do not comply with the underlying zoning objective for various reasons. Objective Z05 as currently worded is considered acceptable and reasonable and allows for reasonable development of these uses. The particular issues raised by the Glasnevin Trust would be more appropriately dealt with as part of the Development Management process.

### **Zoning Objectives, Vision and Use Classes**

At the bottom of each table of Use Classes Related to Zoning Objective it states:

## PART TWO

*Note: Uses which are neither 'Permitted in Principle' nor 'Not Permitted' will be assessed in terms of their contribution towards the achievement of the Zoning Objective and Vision and their compliance and consistency with the policies and objectives of the Development Plan.*

A separate category, open for consideration, is not necessary.

The CI, community infrastructure, zoning objective is to provide for and protect civic, religious, community, education, health and social infrastructure. The vision of this zoning states:

"Protect and promote an inclusive county, accessible to all members of the community, facilitating the sustainable development of necessary community, health, religious, **educational**, social and civic infrastructure. A wide range of different community facilities, civic facilities and social services exist within the County ranging from those of regional importance such as education and health facilities, to those of local and neighbourhood importance such as places of worship, community centres and childcare facilities. It is important to facilitate the development and expansion of such services in order to deliver a quality environment whilst improving the quality of life for all."

The provision of educational facilities is fundamental to this zoning and many of the County's existing educational facilities are within this zoning class. Therefore it is considered an additional separate zoning objective for the provision of schools/education is not required.

Given the range and scope of uses which can come within Tourism, tourism is not specifically defined or listed as permitted or not permitted within the Development Plan. Planning applications for new or extended tourism developments, including those that would be considered to fall within the remit of Objective ED68 (integrated tourism complexes) will be assessed on a case by case basis and on their merits with regard to issues including conformity with relevant policies, objectives and standards contained within the Plan, and compatibility of proposed land use with the zoning objective of subject site.

It is also considered that a separate zoning for tourism uses is not appropriate given the range of offerings throughout the county as it may unduly restrict some tourist activities in some areas. In relation to the provision of hotels, these are permitted in principle or open for consideration on the following zonings: DA, MC, ME, TC & GB, HA, HT, LC, RA, RS, RU and RV.

Specific requests:

- Hotels are not specifically listed as permitted or not permitted and are considered open for consideration within HT. Any application for such a development at this site will be assessed on its own merits through the Development Management process.
- The aim of the Retail Warehousing zoning is to facilitate the sale of bulky goods at highly accessible locations – retail parks. To modify the zoning as suggested would blur the definition of goods permitted to be sold in these retail parks and there is potential for a detrimental impact on city/town centres as indicated by the increasing numbers of vacant units in urban centres where retail parks exist on the periphery.
- Note 16, in relation to food park related uses merely highlights the need for any use within this zoning to relate to the food industry and is considered appropriate.
- Waste disposal and recovery facilities (excluding high impact) are considered acceptable and in line with the objective and vision for the GE zoning. To remove them from this would unnecessarily limit the number of locations suitable for such uses. In relation to the specific location mentioned, it is considered that any application for such a use would be assessed on its own merits.

## PART TWO

- Retail Supermarket ≤ 2,500 sq m net floor relates to shops larger than a local shop and includes a small supermarket giving localised service, designed to cater for normal neighbourhood requirements. The inclusion of this as a permissive use on GE, HT, RS or RW lands would therefore be inconsistent with the objectives and vision of these zonings. Supermarkets of this size would be more appropriately accommodated within the Urban Centres of the County, as reflected in the land use zoning objectives where the use is generally permitted in principle in LC (with a caveat), MC, ME, RA (with caveat), RV and TC zones.
- Appendix 4 of the Draft Plan outlines definitions for different land uses. As per Appendix 4, office is defined as *“A building in which the sole or principal use is the handling and processing of information and research or the undertaking of professional, administrative, financial, marketing or clerical work, and which may include services provided to visiting members of the public and **includes a bank** or building society but not a post office or betting office.”* Offices ≤ 100 sqm and > 100 sqm & < 1000 sqm are permitted in principle within the HT and ME zonings and are considered open for consideration in the GE zoning.
- Places of Worship are deemed open for consideration in the GB and RU zonings. This is the most appropriate designation and any application for this type of development will be assessed on a case by case basis and on their merits with regard to issues including conformity with relevant policies, objectives and standards contained within the Plan, and compatibility of proposed land use at the subject site.
- The objective of the FP zoning is to provide for and facilitate the development of a Food Industry Park. To consider “a single industry that requires a stand-alone rural location by virtue of its activities” within this zoning, where the industry is not related to Food park is inappropriate and risks damaging the FP zoning.
- The existing development of boarding kennels within the GE zoning is a non-conforming use. Objective Z05 of the Draft Plan allows non-conforming to continue to develop where the proposed development would not be detrimental to the amenities of the surrounding area and would accord with the principles of proper planning and sustainable development. The suggestion would allow for such development to occur across all lands zoned GE. This would be at variance with the zoning objective and vision set out for GE and would undermine this zoning objective. Such an amendment would therefore be inappropriate and unnecessary.
- St Margaret’s Recycling & Transfer Centre is a non-conforming use. Objective Z05 of the Draft Plan allows non-conforming to continue to develop where the proposed development would not be detrimental to the amenities of the surrounding area and would accord with the principles of proper planning and sustainable development. The suggestion would allow for such development be permissible within the DA zoning would be at variance with the objective and vision set out and would undermine this zoning objective. Such an amendment would therefore be inappropriate and unnecessary.
- Agri-tourism is permitted in principle within the RU and the HA zoning. This is considered sufficient for the rural areas.
- Given the range of development which can come within the scope of recreational facilities and sport clubs, i.e. pitches, club houses, floodlights, running track, tennis courts, etc, it is considered most appropriate that these uses are open for consideration to allow type of development will be assessed on a case by case basis and on their merits with regard to issues including conformity with relevant policies, objectives and standards contained within the Plan, and compatibility of proposed land use at the subject site.
- The vision for the ME zoning is to provide an area of compact, high intensity/density, employment generating activity with associated commercial and residential development *which focuses on the Metro within a setting of exemplary urban design*. Retail – Local <150 sqm, Retail Convenience ≤ 500 sqm, Retail - Comparison ≤ 500 sqm and Retail - Supermarket ≤ 2,500 sqm are permitted in principle within this zoning. Retail - Comparison >500sqm, Retail -

# PART TWO

Superstore > 2,500 sqm, Retail - Hypermarket > 5,000, Retail - Factory Outlet Centre, Retail Warehouse and Retail - Warehouse Club are specifically listed as not permitted due to their bulky nature and their dependency on car based customers. This type of development is contrary to the vision of the ME zoning and not appropriate at these locations.

- The submission makes reference to the end of life vehicle facility at Wimbletown and future development of same. It is noted that the application of a zoning objective on a site/s does not preclude the existing use of a particular site or property. Furthermore, it is noted that under the RU zoning matrix, Waste Disposal and Recovery Facility (Excluding High Impact) and Waste Disposal and Recovery Facility (High Impact) is open for consideration. Any proposals relating to same will be assessed on its merits having regard to compliance with relevant policies and objectives of the Draft Plan.

Appendix 4, Technical Guidance Notes includes the retail land use class 'retail warehouse club', defined as:

Retail - Warehouse Club – Warehouse clubs or discount clubs have the same meaning as identified in the Retail Planning Guidelines as being “out-of-centre retailers specialising in bulk sales of reduced price, quality goods in unsophisticated buildings... (which)...may limit access...through membership restrictions”. They often combine an element of cash and carry wholesaling with sales to qualifying members of the public. See also the Retail Strategy, Chapter 6 of the Draft Development Plan 2017 - 2023.

The Costco business model generally falls within the retail use 'retail warehouse club', as defined in the Technical Guidance Notes, with its unique nature of dealing with both trade and the public and with both wholesale and retail customers.

The *Retail Planning Guidelines for Planning Authorities 2012*, which superseded the 2005 Guidelines, is silent on the type of retail land use - retail warehouse club. However, the 2008-2016 Retail Strategy for the GDA under the heading Policy Approach to Differing Retail Formats states: “Councils in preparing their own strategies need to be aware of possible new forms of retail which may emerge and take these into account as part of preparing their strategies”. Furthermore, the RPG, 2012, note there is evidence of consumer demand in Ireland for innovative types of large-scale retail warehouses which are capable of displaying a very wide range of bulky goods under one roof, together with a range of customer facilities. The scale of such outlets requires a regional, if not a national, population catchment. Accordingly, proposed exceptions to the 6,000 M2 retail warehouse cap may be considered on the merits of individual development applications in the five NSS Gateway cities of Dublin, Cork, Waterford, Limerick/Shannon and Galway. Planning authorities in those areas may wish to consider designating potential development sites which would satisfy the locational criteria set out in the guidelines.

In recognition of this innovative approach it is considered appropriate to consider the provision of retail warehouse club within the RW zoning objective. Therefore it is recommended the uses open for consideration is amended to have regard to this.

In relation to car parking, Table 12.10 outlines that 1 space per 20 sqm gross floor area is the maximum permitted. This is considered acceptable and no changes are proposed.

## **Recommendation:**

### **Non-Conforming Uses**

#### **CE CH 11.1**

Amend Section 11.5 to match Objective Z05:

# PART TWO

---

Throughout the County there are uses which do not conform to the zoning objective of the area. These are uses which were in existence on 1st October 1964, or which have valid planning permissions, or which are unauthorized but have exceeded the time limit for enforcement proceedings. Reasonable intensification of extensions to and improvement of premises accommodating these uses will generally be permitted ~~within the existing curtilage of the development and~~ subject to normal planning criteria.

## **Zoning Objectives, Vision and Use Classes**

### **CE CH 11.1**

The use 'retail warehouse club' is deleted from the 'Not Permitted' category associated with the RW - Retail Warehouse Zoning Objective. This will allow the use 'retail warehouse club' to be assessed in terms of its contribution towards the achievement of the Zoning Objective and Vision of RW zoning.

### **CE CH 11.2**

Delete retail hypermarket > 500-sqm and retail – factory outlet centre.

### **CE CH 11.3**

Amend Retail Warehouse Zoning vision to read:

Facilitate the sale of bulky goods/*goods in bulk* within high quality settings and highly accessible locations, with an emphasis on exemplar sustainable design and aesthetic quality.

### **CE CH 11.4**

In Appendix 4, Amend retail warehouse club definition to state:

*Retail - Warehouse Club – Generally out-of-centre retailers specializing in bulk sales of reduced price, quality goods in unsophisticated buildings with dedicated car parks. The operator may limit access to businesses, organisations or classes of individual, through membership restrictions. They often combine an element of cash and carry wholesaling with sales to qualifying members of the public.*

# PART TWO

## Chapter 12 – Development Management Standards

### Submissions Received Relevant to this Chapter

D00028, D00213, D00284, D00386, D00408, D00474, D00478, D00502, D00514, D00529, D00543, D00544, D00547, D00558, D00561, D00566, D00576, D00582, D00583, D00621, D00628, D00734, D00807.

### Issues Raised

#### Background

Keep Ireland Open request that Section 12.1 – Enforcement is rewritten to further outline the enforcement process.

#### Design Criteria for Urban Development

New text is proposed for Objective DMS 05 in relation to the provision of public art and Objective DMS 18 in relation to the location of utility facilities.

The increase in the amount of signage, hoarding and advertising at the Coolmine Industrial Estate is highlighted as it detracts from the areas. Fingal are requested to take action against these and to limit the number of signs in the area.

One submission states there is a large number of utility units throughout the County that are in disrepair and/or covered in graffiti. 5 actions are suggested to deal with this and it is requested these are included in the Development Plan.

The Department of Education and Skills request that Objectives DMS16, DMS17 and DMS71, be modified to state that such green design and energy strategies for schools shall be specifically guided by the schools specific conservation measures promoted by the Department of Education and Skills and captured in its technical guidance documents.

The submission from the HSE requests the inclusion of text which allows for flexibility in height for the construction of healthcare facilities.

#### Design Criteria for Residential Development

Fingal County Council must ensure all housing developments are built to a high standard and quality.

New standards for housing units and developments are suggested, these include:

- Living space of 100 square metres min.
- Rear Back garden of 150 square metres min.
- Front garden of 32 square metres min.
- No house or residence fronting directly on to a pedestrian walkway, path or road.
- Limit in the size of housing developments and a reduction in the number of estates containing high-density housing with small living areas.
- Proper road infrastructure for all residential estates, including trees, speed ramps and parking on every residential area.
- Provision for the elderly and disabled in any future housing development.

New text is suggested for Section 12.4 in relation to dwelling mix to limit the mix of units in any one scheme. It is also requested that Objective DMS 34 is amended to specify shared laundry and storage cellars and that Objective DMS 35 is then deleted.

# PART TWO

---

Alternative wording for DMS 37 is suggested, this would remove the specified distance for refuse bins.

Lastly it is suggested that the requirement to provide written documentary evidence for a 'Qualifying Lease' in applications for student accommodation developments is removed.

## **Open Space**

It is essential that Fingal ensure that that designated open space areas within residential developments are properly developed. It is felt some areas of open space are un-landscaped and become waste ground.

It is suggested Fingal should increase the amount of open space required in new developments.

One submission proposes to amend Table 12.5 to allow for contribution in lieu of pocket parks. It is proposed to amend the wording of Objective DMS 59 (relating to location of pocket parks) to only require dwellings be located within 150m of pocket parks, where possible.

Another submission asks for further objectives regarding the design of open space. Specific reference is made to "kick-about" areas. These areas should be developed as multi-functional all weather areas. High order parks should include well designed floodlit, high quality, flexible, multi-functional all weather facilities, which should be provided as integral elements of their active sports infrastructure.

A submission outlines that playing pitches within public parks are often prohibited for use for training - these pitches should be made available.

There needs to be an assessment of existing sports facilities in relation to their adequacy and capacity. Upgrade and extension works should be on-going.

One submission requests that the method for calculating open space is amended to include environmental open space, green corridors and areas under high voltage electricity lines. It is also requested that Objectives DMS 57, 57 A and 57 B are deleted. These relate to the minimum provisions of public open space within any residential development.

Objectives DMS61 should be amended to state that where land is in institutional use or within a landscaped demesne or similar and there is an established sporting use / recreational activity, that there should be a general presumption against development of such lands.

The submission from the HSE seeks to amend the wording of Objective DMS61 and note that open space on Institutional Lands is not always compatible with hospital development.

It is requested that Objective DMS 62, relating to areas of less than 500 sqm not being taken in charge, is omitted.

Objective DMS 67 should be amended to include instances where existing facilities are being redeveloped.

It is suggested that Objective DMS 72 is amended to omit the maximum 10% of open space which can be taken up by SuDS, the same submission also requests that Objective DMS 73 – excluding the use of underground storage tanks on areas of open space – is deleted.

# PART TWO

---

An amendment to DMS 74 – provision of playgrounds – is suggested. This would take away the quantitative aspect of the objective.

## **Community Infrastructure, Facilities and Services**

It is requested that Section 12.8, subsection Childcare Facilities is amended so that childcare facilities are provided having 'regard to' rather than 'in accordance' with the Childcare Guidelines.

The Dublin 15 Community Council request that DMS 95 and 96 are amended as follows:

*Facilitate the development of additional places of worship through actively surveying the community to understand the diverse religious needs for a place of worship. Consult to understand which communities are compatible for shared premises / site. Identify sufficient number of sites on an area basis through the designation and/ or zoning of lands for such community requirements and examine locating places of worship within shared community facilities.*

*Require that new or enlarged places of worship be located in places where they do not create unacceptable traffic congestion or car parking difficulties nor cause a nuisance to existing residents or businesses during operational times for religious worship.*

Objectives DMS 99, 100 and 101 – burial grounds and crematoria – are supported. It is requested that a new objective is included in this section to promote and facilitate ancillary uses, such as florists, monument services, etc., at these facilities.

## **Enterprise and Employment**

Contrary views were received in relation to Objectives DMS 106 and 107 – provision of fast food takeaways. It was suggested from the Irish Heart Foundation that these objectives need strengthened and exclusion zones created around school buildings. While a submission from KFC suggested that the objectives require subjective assessments that may lead to inconsistencies and are anti-competitive.

It was also suggested that the objectives in the Draft Plan could have the effect of banning hot foot takeaways from the entire County.

## **Infrastructure and Movement**

### Transportation

Deliveries for retail developments should take places without disruption or danger to others.

It is requested that adequate facilities for cyclists are provided with all developments. This includes safe and secure locking areas with restricted access, CCTV, proper stands for locking bikes. Certain developments should also provide showers, changing rooms, lockers, space for drying wet clothes or raingear, etc for commuting cyclists.

The Institute of Technology Blanchardstown (ITB) notes their need additional parking on or near campus. The car parking standards outlined in the Draft Plan would significantly impact the Institute's ability to grow and would undermine the work done to date on promoting Smarter Travel

Adequate car parking needs to be provided in public parks which accommodate playing pitches.

# PART TWO

---

The development management standards relating to car parking should be amended to allow management of car parks ancillary to retail uses, without the need to introduce paid parking.

Car & Bicycle Parking Standards for Healthcare Facilities should be removed and replaced instead with a car parking standard to be determined by the Planning Authority in consultation with the HSE.

The requirement for visitor parking should be removed. The draft Plan should have flexibility for visitor spaces to be provided on a case-by-case basis.

One submission requests further clarity for the abbreviations in Table 12.8 – Car Parking Standards.

An amendment to Objective DMS120 to include reference to the Metro North Economic Corridor already identified is suggested.

An additional objective is requested for this section of the Draft Plan. This would seek to identify existing public rights of way and walking routes and prohibit development which would interfere with them and with access to the countryside or recreational amenity

## Overhead Cables

The submission from Keep Ireland Open requests that this section of Chapter 12 is moved to Chapter 7 and additional objectives are suggested.

## **Archaeological and Architectural Heritage**

It is suggested that Objective DMS 157, relating to development in ACA's, is amended to allow for innovative design solutions where they positively contribute to the character of an area.

Again the Keep Ireland Open submission contains numerous amendments to the text in this section of Chapter 12.

## **Natural Heritage**

Keep Ireland Open suggests that this text be moved to Section 10.2 of the Draft Plan and suggest amendments to the text.

## **Extractive Industry**

The submission from Keep Ireland Open suggests amendments to Objective DMS 176.

## **Major Accidents – Seveso Sites**

Submissions seek the removal of Swords Laboratories T/A Bristol Meyers Squibb, Cruiserath Rd, Mulhuddart D15, and Chemco Ireland from Table 12.13 List of Sevso sites in Fingal

## **Chief Executive's Response**

### **Background**

It is considered the information outlined in Section 12.1 – Enforcement, is suffice to outline the broad elements of the enforcement procedure.

### Design Criteria for Urban Development

The provision of public art, as required by Objective DMS 05 is part of the Council's strategy to encourage and give support to proposals for the creation and display of works of art in suitable,

# PART TWO

---

accessible public places, in order to improve the environment and make Fingal as interesting and stimulating as possible for the local community and visitors. It is noted that Objective DMS 05 relates only to larger developments.

The quality of well finished buildings and high quality landscaping schemes has often been eroded by the poor location and badly thought out design of utility facilities, such as electricity substations, especially those located to the front and side of buildings. Objective DMS 18 recognises the importance of well-designed and sensitively located utility facilities and is necessary to ensure due consideration is given in the siting and location of such facilities.

The issue of signage, hoarding and advertising at the Coolmine Industrial Estate is acknowledged. This is an enforcement issue and will be dealt with through these processes. Section 12.3, subsections Shopfronts and Other Signage outlines the objectives to deal with applications for new signage proposals.

The suggested actions for dealing with utility units in disrepair and/or covered in graffiti are not within the remit of the Development Plan. Objectives DMS 18 and 19 outline the policy for assessment of new utility facilities.

The comments from the Department of Education and Skills regarding Objectives DMS16, DMS17 and DMS71 are noted. However, it is considered appropriate that school and educational buildings should especially be encouraged to provide green walls and roofs where possible. No changes to the text are recommended.

The provision of buildings of high quality design is an underlying theme of the Development Plan. The appropriate height of a development will be assessed through Objective DMS03 and through the Development Management process and is not limited to Health Care facilities.

## **Design Criteria for Residential Development**

An overarching aim of the Development Plan is to create and sustain people-friendly places for the benefit of the residents and businesses of Fingal, whilst providing the highest quality design solutions. Investing in good design can create economically successful development that functions well and has a lasting effect into the future.

The detailed specifications set out in Tables 12.1, 12.2, 12.3 12.6 and Objective DMS 86 and 87 are consistent with national guidelines in relation to residential unit size, room size and provision of open space. These minimum standards will provide high quality living space and will out set clear parameters for the development of residential units in the county into the future. It is not necessary to amend these.

Section 12.4, subsection Mix of Dwelling Types seeks to provide a balance range of dwelling types and sizes throughout the County. It is not considered appropriate to amend this section.

Objective DMS 34 does not only relate to laundry and storage facilities. To amend the objective as suggested would unduly restrict the amount of communal facilities which may be required for apartment developments.

Objective DMS 37 seeks to ensure adequate bin facilities are provided at a reasonable distance from any residential unit. To amend this as suggested would result in substandard developments.

# PART TWO

---

Student accommodation is subject to different standards than other residential developments. To ensure the accommodation will be made available for students, the onus is on the developer to demonstrate ties with a third level institution for which the accommodation will be made available. The 'Qualifying Lease' is considered a reasonable way of achieving this.

## **Open Space**

The provision of accessible open space is an integral part of the provision of high-quality green infrastructure for communities and forms a core element of the Draft Plan. Objective DMS68 seeks to ensure developers layout and maintain open space areas to a high standard, until such a time as they are taken in charge by the Council.

Objectives DMS57, 57A and 57B outline the amount of open space which should be provided. This is in line with the existing Plan and is considered an appropriate amount of space. No changes are considered necessary.

The provision of pocket parks within 150m of every residential unit is considered essential for good design and amenity purposes. A contribution in lieu of this basic open space provision is unacceptable.

Kick-about areas are just that, areas of open space where informal games can be played. It is not appropriate or possible to develop every kick-about space as a multi-functional all weather area. Regional parks provide for a large range of uses, including formal and informal play areas. The Council provides well designed floodlit, high quality, flexible, multi-functional all weather facilities throughout the County.

Fingal County Council maintains 168 sports pitches in Regional and Neighbourhood Parks which are used by Sporting Organisations throughout Fingal. Any organisation can apply to avail of the existing pitches.

The open space and public parks are continually being maintained and upgraded. This is a function of the Operations Department in the Council.

As stated above, Objectives DMS57, 57A and 57B outline the amount of open space which should be provided with residential developments. This is in line with the existing Plan and is considered an appropriate amount of space. It is not appropriate to consider environmental open space, green corridors and areas under high voltage electricity lines which have limited use and therefore limited value. It is inappropriate to delete these objectives.

Objective DMS61 seeks to retain open space in institutional lands, landscaped demesnes and other similar properties insofar as practical. To further limit the development of these lands would be inappropriate. The Council recognise that open space on Institutional lands may not always be compatible. Objective DMS61 is worded in such a way to allow flexibility depending on the individual circumstance, through the inclusion of the words "as far as practicable".

Developers are advised to design and create open space areas of more than 500sqm in order for them to be taken in charge. It is not appropriate to take areas of less than 500sqm in charge due to the cost and resources required to maintain the same.

The amended text is acceptable.

# PART TWO

---

The provision of SuDS within an element of open space is acceptable. However, given its SuDS use, it is accepted that this space may not be available for recreational purposes all year round. Therefore it is considered appropriate to limit the amount of this type of open space. This is a reasonable approach. The provision of underground storage tanks is unacceptable.

DMS 74 requires that playground facilities are provided at a rate of 4 sqm per housing unit. To remove this quantitative aspect of the objective would weaken it and risk an under provision of facilities.

## **Community Infrastructure, Facilities and Services**

Section 28 of the Planning and Development Act, as amended, require the Planning Authority to have regard to any guidelines issued by the Minister, such as the Childcare Guidelines. The Act further requires that in the making of a Development Plan, Planning Authorities must demonstrate how the Planning Authority has implemented the policies and objectives of the Minister contained in the guidelines. Therefore it is considered appropriate that childcare facilities are provided in accordance with the guidelines.

The Draft Plan recognises the need for additional places of worship. Objectives PM78 and 79, together with DMS95 and 96 seek to facilitate the development of such buildings through designation and/or zoning of lands for such requirements and encouraging these developments in appropriate locations, having regard to potential impact on adjoining amenity. It is considered objectives outlined adequately address the issues raised and no additional changes are required.

The support of Objectives DMS 99, 100 and 101 is welcomed. The provision of ancillary uses adjacent to burial ground is recognised. However it is felt that this is most appropriately dealt with in Chapter 11, Land Use Zoning Objectives. It is recommended where burial grounds are permitted in principle a caveat is included which allows for “appropriately scaled ancillary facilities”.

## **Enterprise and Employment**

The submissions received in relation to Fast Food Outlet / Takeaways are noted. Objectives DMS106 and 107 and ED52 have been drafted to manage the provision of fast food outlets and takeaways. Fast food outlets have the potential to cause disturbance, nuisance and detract from the amenities of an area and as such, proposals for new or extended outlets will be carefully considered. For these reasons, the prevention of an excessive concentration of fast food outlets is considered a reasonable approach.

In terms of Objective DMS107, it is acknowledged that the diet and the impact of different foods on health is a highly complex matter and the link to land use planning is tenuous; however, the content of the Local Area Plans-Guidelines for Planning Authorities 2013 (DECLG), is noted and supports the policy position of the Draft Plan in relation to location restrictions in close proximity to schools. The Guidelines outline that planning has an important role to play in promoting and facilitating active and healthy living patterns for local communities. The Guidelines include that ensuring that exposure of children to the promotion of foods that are high in fat, salt or sugar is reduced such as the careful consideration of the appropriateness and or location of fast food outlets in the vicinity of schools and parks as an example of promoting active and healthier lifestyles. The Draft Plan extrapolates this guidance for local area plans to the wider County through Objective DMS107. The implementation of this objective will be on a case by case basis through the development management system.

# PART TWO

---

## Infrastructure and Movement

### Transportation

The requirement for efficient arrangement of delivery of goods for retail development is acknowledged. However, this is best dealt with on a case-by-case basis and within the Development Management process.

Table 12.9 outlines the bicycle parking standards for all types of developments. Objective DMS117 seeks to ensure all new employment and education developments include adequate, secure and dry bicycle parking.

A number of submissions submit that additional car-parking spaces are needed whilst others request a reduction in car-parking provision. There is need to provide for flexible car parking arrangements. The standards outlined in Table 12.8 outline the normal and maximum requirements and allow for a degree of flexibility depending on the individual circumstances. Following a review of the car parking standards, the Transportation Section of the Council proposes an increase from 5 no. spaces per lecture theatre to 10 no. spaces for Colleges of Higher Education and parking allowances for offices and labs / workshops on campus be calculated separately. Objective DMS112 highlights the aim to limit the number of car parking spaces provided.

The provision of paid parking is a recognised tool to manage demand at retail developments. The pricing regime should favour shoppers, who generally stay for shorter times, over employees, who generally stay for longer times. Objective DMS112 and 113 acknowledge this.

The abbreviations for Table 12.8 are outlined in the text accompanying the table.

It is considered appropriate that there are car & bicycle park standards for Healthcare Facilities. Table 12.8 and Objective DMS 112 outline the requirements.

Visitor parking is an essential element of any residential development. It is not appropriate to remove this.

Metro North remains a central part of the transport strategy both for the Council and the NTA. The route outlined on the Development Plan maps corresponds with the Metro North alignment already identified. It is not considered necessary to amend Objective DMS 120 to reflect this.

Section 12.3, subsection Public Rights of Way deals with the outlines the Council's policy in relation to public rights of way. In particular Objective RF109 states: Support existing rights of way, and facilitate their further expansion throughout the County, resisting development which would prejudice public access to rights of way unless specific arrangements are made for suitable alternative linkages, in a manner which is consistent with the sustainable development and land use zoning objectives of the area.

### Overhead Cables

The submission from Keep Ireland Open is acknowledged however it is considered Chapter 12 is the most appropriate location for these objectives. Furthermore it is also considered Objectives DMS138 to DMS141 adequately deal with this issue.

# PART TWO

---

## **Archaeological and Architectural Heritage**

Innovative design is welcomed throughout the County. Objective DMS157 does not preclude innovative design solutions where they positively contribute to the character of an area and no additional text is considered necessary.

The submission from Keep Ireland Open is acknowledged however it is considered these issues are dealt with sufficiently in the existing text.

## **Natural Heritage**

The submission from Keep Ireland Open is acknowledged however it is considered these issues are dealt with sufficiently in the existing text.

## **Extractive Industry**

The submission from Keep Ireland Open is acknowledged however it is considered these issues are dealt with sufficiently in the existing text. Furthermore this issue is also dealt with within Section 5.4, subsection Land Reclamation and Aggregate Extraction.

## **Major Accidents – Seveso Sites**

The list of Seveso Sites is received from the Health and Safety Authority at regular intervals throughout the year. On the most recent list, dated December 2015, Swords Laboratories T/A Bristol Meyers Squibb has been removed. This will be reflected in Table 12.13.

## **Recommendation:**

### **Open Space**

#### **CE CH 12.1**

Amend objective DMS67 to read:

Ensure, where possible, complementary facilities, such as dressing rooms and storage facilities, are provided as part of the open space provision, *for new and existing areas*.

### **Community Infrastructure, Facilities and Services**

#### **CE CH 12.2**

Amend Land Use Zoning Classes, Chapter 11. Where burial grounds are permitted in principle, include an additional caveat to state: *“appropriately scaled ancillary facilities”*.

This will relate to the following zoning classes: GB, HA, RU and RV.

### **Infrastructure and Movement**

#### **CE CH 12.3**

##### Transportation

Amend Table 12.8 Car Parking Standards within Section 12.10 of Chapter 12 Development Management Standards as follows: College of Higher Education increase 5 no. spaces to 10 no. spaces per lecture theatre.

\*Insert the following as a footnote: Parking allowances for offices and labs / workshops on a Higher Education College Campus to be calculated separately in accordance with required car parking standards.

### **Major Accidents – Seveso Sites**

#### **CE CH 12.4**

Remove Swords Laboratories T/A Bristol Meyers Squibb and Chemco Ireland Ballycoolin from Table 12.13.

# PART TWO



## CHIEF EXECUTIVE'S REPORT DRAFT FINGAL COUNTY DEVELOPMENT PLAN 2017-2023

MAP/SHEETS



# PART TWO

---

## Map/Sheets

### Sheet 2 Fingal North

#### Submissions Received Relevant to this Sheet

D00019, D00054, D00068, D00193, D00318, D00320, D00322, D00323, D00407, D00429, D00430, D00433, D00435, D00436, D00438, D00441, D00442, D00447, D00452, D00463, D00510, D00527, D00595, D00602, D00630, D00638, D00666, D00667, D00681, D00697, D00699, D00702, D00704, D00706, D00747, D00923,

#### Summary of Issues

##### Local Objectives for One-Off Houses

There was 1 no. submission requesting a local objective for a one-off rural house on lands at Walshestown, Lusk. The lands are located within the Naul uplands and are zoned HA-High Amenity.

##### Rezoning from RU to RC

A number of submissions seek to have lands rezoned from RU to RC at Adamstown, Curragh West and Hedgestown.

##### Rezoning from RU to RC/RB

A submission seeks to have land rezoned from RU to RC/RB at Curragh West, Naul for a renewable energy hub.

##### Commercial

One submission requests the rezoning of c. 28.5 ha's. [70.4 acres] of RU zoned lands to GE at Courtlough for a Data Centre and include a new local objective to support this use as follows: i)'To provide for the development of data centre facilities and associated related industries, with extensive landscaping, a high architectural standard of layout and building design relating to lands at Courtlough'.

##### Proposed Local Objectives

One submission requests the inclusion of a Local Objective to facilitate a rural-tourism scheme and integrated facility comprising a culinary school with ancillary and innovative accommodation such as lodges and yurts on RU and HA zoned lands to the north of Garristown village.

##### Reinstatement of Local Objectives

Reinstate Local Objective 109 on HA zoned lands at Baldaragh, Naul as follows: 'Facilitate the relocation of offices, weighbridge, primary vehicular entrance and internal access road serving existing quarry, to be sensitively designed and located on site. Maintain existing entrance on Baldaragh Road as an emergency entrance only.'

#### **Chief Executive's Response**

##### Local Objectives for One-Off Houses

The Rural Settlement Strategy as set out in the Draft Plan reflects the existing policy in the current FDP 2011-2017. The policy recognises the need to provide for housing for the rural community but limits the amount of housing in the open countryside and provides for alternative options within the rural area either in the villages or rural clusters as a more sustainable and suitable location for rural generated housing.

## PART TWO

---

Allowing certain individuals to be excluded from this policy would contradict this overall approach and be contrary to the proper planning and sustainable development of the area. The inclusion of objectives facilitating one-off dwellings would allow the sale of these sites on the open market, thereby opening up the possibility of urban-generated housing development on the site. Government policy as articulated by the National Spatial Strategy and the *Sustainable Rural Housing: Guidelines for Planning Authorities* of April 2005, classifies the rural area of Fingal as “an area under strong urban influence” where the housing requirements of the rural community should be facilitated but urban-generated housing should be directed to areas zoned for new residential development in cities, towns and villages. This approach is reflected in the Regional Planning Guidelines for the Greater Dublin Area. The inclusion of objectives in the Draft Plan facilitating the development of rural housing outside the provisions of the Rural Settlement Strategy would thus run counter to national and regional policy.

The inclusion of a map based local objective, which would be at odds with (i.e. not consistent with) the policies and objectives contained in the provisions of the relevant chapter of the Development Plan or Appendices are legally flawed and open to legal challenge. Any local objectives that render nugatory relevant policy considerations including Guidelines which specify criteria for new dwellings or eligibility for planning permission for new rural housing cannot be considered to be consistent with the sustainability principles that inform these policy considerations and adopted criteria.

There is a lack of an evidence based need or planning rationale for the inclusion of objectives providing for rural housing and as such would conflict with the policy and guidance outlined above. The exemption of certain sites from compliance with the relevant policies and guidelines would lead to an increase in the number of houses being developed in the rural area, inappropriate and unsustainable settlement patterns and the loss of the agricultural resource and as such would be contrary to proper planning and sustainable development.

### Rezoning RU to RC

There are currently thirty four existing Rural Clusters within the Draft Plan to cater for rural generated housing need. These Rural Clusters have a strong residential focus and are based on a small number of individual houses and typically take the form of between 5 and 15 dwellings. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small clusters. For the most part, they will provide an opportunity for family members of existing households within the cluster to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

A large number of submissions seek to rezone RU/RB/GB/HA lands to RC at the following locations across the County; Adamstown, Ballymadun, Ballough-Lusk, Balcarrick-Donabate, Balcarrick-Corballis, Baskin Lane/Stockhole Junction, Blackhills, Burrow-Portrane, Brownstown-Swords, Colecott, Collinstown Lane, Corduff, Curragh West, Feltrim-Malahide, Greatcommons-Lusk, Grougha, Hedgestown, Kilsallaghan, Magillstown-Swords, Middlefield-Portrane, Newpark-The Ward and Wimbletown. The majority of these proposals are new RC's with the remainder proposing extensions to existing RC's across the County. The Council considers there is no merit in rezoning new RC's or large scale extensions to existing RC's within the County based on the rationale set out in this report. The Council, will, however, consider small scale incremental additions to existing clusters to facilitate rural generated housing need. Proposals for both new RC's and extensions to existing RC's will be discussed in detail on the relevant sheets in this report.

# PART TWO

---

A number of submissions relevant to this Sheet 2 seeks to rezone RU zoned lands at Adamstown, Hedgestown and Curragh West as new Rural Clusters [RC's].

Adamstown, a proposed new RC of c.10 ha's. [24.7acres] is located c.1.35kms. to the south of the existing Baldwinstown Cross RC in the north/west of the County. There is no public foul mains drainage in the area and the area is served by a relatively poor road network. The lands are currently zoned RU.

Hedgestown North, a proposed new RC of c.3 ha's. [7.4 acres] is located c.0.5 kms. to the north of the existing Hedgestown [Five Roads] RB & RC. There is no public foul mains drainage in the area and the area is served by a relatively poor road network. The lands are currently zoned RU.

Curragh West, a proposed new RC of c.1 ha's. [2.4 acres] is located in the northern extremity of the County in a relatively remote location. There is no public foul mains drainage in the area. The area is served by the Regional Road-R122 to Naul. The lands are currently zoned RU, are designated sensitive landscape with protected views along the R122. A large agricultural shed currently occupies the lands. This rural cluster is proposed in the context of facilitating development relating to renewable energy and not to facilitate rural generated housing need. This proposal is discussed in detail further on in this report in the context of the current RU zoning of the lands where such a proposal can be considered on its own merits through the Development Management Process.

The change in zoning of these lands to designated new Rural Clusters would represent a piecemeal uncoordinated rezoning of lands for which there is no evidence based need. The Ministerial Planning Guidelines on Development Plans, issued under Section 28 of the Planning and Development Act 2000, state "zoning that is not responsive to or justifiable by reference to reasonable needs, or that substantially exceeds such needs, is not consistent with proper planning and sustainable development." The Guidelines also make clear that in order to support public confidence in the planning system and the development plan, decisions to zone land must be clearly justified on the basis of established need and must support the aims and strategy of the plan taking the following specific matters into account:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage policy, including conservation of habitats and other sensitive areas.

The zoning of these lands cannot be justified on the matters outlined above. These submissions propose residential development remote from existing RC lands, while RC zoned lands remain undeveloped across the County and are sufficient in area to accommodate local rural based housing need. The existing designated rural clusters at Hedgestown and Baldwinstown Cross RC contains no public drainage but are sufficient in area to accommodate local rural based housing need. Hedgestown RC has the potential for c. 20 no. additional dwellings while Baldwinstown Cross RC has potential for c. 8 no. additional dwellings. These figures are however, dependent on meeting the requirements for individual on-site treatment systems. There is significant provision also available within the adjoining rural villages at Garristown and Naul and the larger settlement of Lusk. Such a development pattern would result in deficiencies in terms of the provision of

# PART TWO

---

basic infrastructure and public services, in addition to unsustainable travel patterns and the loss of extensive areas of agricultural land of which it is Council policy to protect.

The quantum and location of zoned land in the County is directly influenced by the Development Plan's Settlement and Core Strategy. The Planning and Development (Amendment) Act 2010 introduced the requirement for an evidence based 'Core Strategy' to be provided in Development Plans. The Core Strategy identifies the quantum and location of development for the plan period that is consistent with the regionally defined population targets and settlement hierarchy, and, which reflects the availability of existing services, planned investment, sequential development and environmental requirements. The Core Strategy sets out the specific population targets and housing requirements across the County and the elements of the settlement hierarchy thereby act as a clear framework for amendments to existing zonings. The Core Strategy must demonstrate that the development objectives in the Development Plan are consistent with the National Spatial Strategy and Regional Planning Guidelines.

Government policy as articulated by the National Spatial Strategy and the Sustainable Rural Housing: Guidelines for Planning Authorities of April 2005, classifies the rural area of Fingal as "an area under strong urban influence" where the housing requirements of the rural community should be facilitated but urban generated housing should be directed to areas zoned for residential development in cities, towns and villages. The approach is reflected in the Regional Planning Guidelines for the Greater Dublin Area. The inclusion in the Draft Plan of objectives facilitating the provision of additional housing without due regard to the Core Strategy and its approach is contrary to the national and regional direction.

Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period. In conclusion, there is no evidence based need or planning rationale for the proposed zoning which would be in breach of the Core Strategy of both the FDP 2011-2017, the Draft Plan 2017-2023 and the Regional Planning Guidelines 2010-2022 and as such would be contrary to proper planning and sustainable development.

## Rezoning from RU to RC/RB

The Draft Plan at Sections 5.3 and 7.3 relating to renewable energy promotes and facilitates new and innovative technologies seeking to provide renewable energies. The Draft Plan recognises the potential for rural areas to harness renewable energy projects including wind, hydro and solar energy. The Council will support renewable energy projects in rural areas, however, such projects will have to carefully balanced against the need to protect landscape sensitivities, residential amenities, views or prospects, public rights of way, wildlife habitats, special areas of conservation, protected structures and bird migration paths. Development relating to renewable energy is open for consideration in RU zoned lands. Such proposals will be considered on a case by case basis and assessed on its own merits in terms of compliance with the overall zoning objective and vision for the lands and the relevant renewable energy objectives set out in the Draft Plan through the Development Management process. In this regard, the proposal does not warrant a change in zoning to RB. The response above adequately addresses the reasons why the Council would not recommend the rezoning of these RU zoned lands to RC.

## Commercial

The subject lands of 28.5 ha's. [70.4 acres] at Courtlough are located to the south of an existing landbank of GE and HT zoned lands to the east and west of the M1. This landbank is largely undeveloped. The subject lands are currently zoned RU and are in agricultural use and run parallel to the R132 to Balbriggan.

## PART TWO

---

Fingal's Economic Strategy set out in the Draft Plan seeks to attract a range of employment types, across business and industry sectors at the most appropriate and accessible locations within the County, minimising the requirement for undue commuting and improving the quality of life for Fingal's residents. Strategic Policy 10 and objectives ED02 and ED03 of the Draft Plan seeks to promote enterprise and employment throughout the County, particularly in the growth Centres of Swords, Blanchardstown and Balbriggan.

In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach as advocated in the DoECLG Development Plan Guidelines 2007 must be applied to the zoning of land for development. In this regard, areas to be zoned should be contiguous to existing zoned development lands, a strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands and zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided). Any future zonings shall have regard to this sequential approach.

There is a more than adequate quantum of employment zoned lands within the County to accommodate any future employment growth in readily accessible locations within the County where necessary infrastructure is at an optimum. The quantum of existing undeveloped GE zoned lands currently available for development across the County is c.1218 ha's. [3009 acres]. These lands are located at highly accessible locations close to the motorway and national road network off the M50 and M1 corridors and at Damastown. The M50 corridor alone has an available and accessible landbank of c.399 ha's. [985 acres] of undeveloped GE zoned lands. The undeveloped landbank of GE and HT zoned lands at Courtlough equates to c. 57.6 ha's [142 acres]. These figures represent a substantial provision of GE zoned lands readily available for development.

The National Transport Authority, in their pre-draft submission, states that the strategic transport function of the M1 should be maintained by limiting the extent of development which would give rise to the generation of local car-based traffic on the national road network. The M1 (&M50) are vital economic corridors for Dublin, and the east coast in general, and should not be used to facilitate development of employment which would be more appropriately developed in areas well served by existing or committed high quality public transport and/or within the key settlements of Swords, Blanchardstown or Balbriggan.

In the absence of the sequential approach, any coherent evidence based need or planning rationale for the proposed change in zoning in this rural location, the proposal to change a substantial proportion of RU lands to GE would result in an un-coordinated, ad-hoc provision of unsustainable employment lands of which there no evidence based need. The proposed zoning would be in breach of key objectives of the current FDP 2011-2017 and the emerging Draft FDP 2017-2023 and NTA policy to channel employment growth into the large urban centres of the County, aligned with existing and planned infrastructure and as such is contrary to proper planning and sustainable development.

### Proposed Local Objectives/Specific Objectives

The Draft Plan is explicit in its promotion and support for sustainable rural tourism initiatives within Section 5.3. Specifically Objective RF103 of the plan supports sustainable initiatives which develop the tourist potential of the rural area while recognising and enhancing the quality and values of the rural area. The Draft Plan also recognises the need for the provision of camp sites to cater for touring holidays, appropriately located and sensitively designed in rural areas. The

# PART TWO

---

potential to attract the recent niche tourism market of glamping which would include yurts is also promoted in the Draft Plan. Campsites are permitted in principle in the GB, HA and RU rural land use zones across the County. All proposals for rural tourism schemes will be considered on a case by case basis and assessed on its own merits in terms of compliance with the overall zoning objective and vision for the lands and the relevant rural tourism objectives set out in the Draft Plan through the Development Management process. In this regard, a local objective for the proposed uses is not required on these lands.

## Reinstatement of Local Objectives

The Draft Plan recognises the importance of the extractive industries to the local and national economy in Section 5.3 of the Draft Plan. Chapter 12 Development Management – Section 12.13 and specifically Objective DM169 includes detailed guidance to mitigate against the likely effects of extractive development on the environment, including appropriate restoration requirements. The existing quarry is located on HA - High Amenity lands within the Naul uplands where quarrying use is open for consideration. All proposals in relation to quarrying extraction will be considered on a case by case basis and assessed on its own merits in terms of compliance with the overall zoning objective and vision for the lands and the relevant objectives in relation to quarrying extraction set out in the Draft Plan through the Development Management process. In this regard, the reinstatement of Local Objective 109 is not considered necessary on these lands.

## **Recommendations**

No change.

# PART TWO

## Sheet 3 Fingal Central

### Submissions Received Relevant to this Sheet

D00020, D00054, D00068, D00061, D00193, D0023, D00239, D00318, D00320, D00322, D00323, D00407, D00429, D00430, D00431, D00433, D00435, D00436, D00438, D00441, D00442, D00447, D00452, D00456, D00457, D00462, D00463, D00496, D00546, D00565, D00586, D00595, D00596, D00598, D00602, D00615, D00623, D00625, D00630, D00639, D00664, D00665, D00666, D00681, D00697, D00699, D00702, D00704, D00706, D00707, D00721, D00722, D00729, D00731, D00747, D00749, D00751, D00752, D00764, D00865, D00767, D00769, D00770, D00771, D00772, D00773, D00774, D00775, D00776, D00786, D00787, D00788, D00789, D00790, D00791, D00794, D00795, D00796, D00797, D00798, D00799, D00800, D00801, D00802, D00804, D00805, D00809, D00810, D00811, D00812, D00813, D00815, D00816, D00817, D00818, D00819, D00820, D00825, D00826, D00829, D00831, D00832, D00833, D00835, D00837, D00838, D00839, D00841, D00843, D00845, D00846, D00851, D00852, D00857, D00860, D00861, D00862, D00863, D00864, D00865, D00874, D00882, D00883, D00884, D00885, D00886, D00887, D00890, D00895, D00897, D00900, D00908, D00909, D00910, D00911, D00912, D00913, D00914, D00915, D00916, D00918, D00919, D00920, D00921, D00922, D00923, D00927, D00928.

(Please see appendices for map based changes).

### Summary of Issues

#### Rezoning from RV to RS-Residential and Replace the LAP Objective with a Masterplan objective

A number of submissions request the rezoning of RV zoned land to the north of the River Ward in Rivermeade Village to RS-Residential. 2 submissions seek the replacement of the LAP Objective with a Masterplan Objective.

#### Rezoning from RU and RC to RV

A number of submissions seek to rezone RU lands to RV in vicinity of the rural villages of Oldtown Ballyboughal, Coolquay and Rowlestown and extend the RV development boundary accordingly. A number of submissions seek to rezone RC and RU lands at Ballymadun and Thornton to RV. The Ballymadun lands to include a Masterplan objective.

#### Replace the LAP objective for Coolquay with a Masterplan Objective

One submission seeks to replace the LAP objective for Coolquay with a Masterplan objective.

#### Rezoning from RU and GB lands to RC

A number of submissions seek to rezone RU zoned lands to RV at Wimbletown, Ballymadun, Colecott and Kilsallaghan. A number of submissions seek to rezone GB lands to RC at Brownstown-Swords and at Newpark-The Ward.

#### Rezoning from RU to RB lands at Roganstown between Rowlestown and Swords

One submission seeks the rezoning from Rural 'RU' to Rural Business 'RB', at Roganstown, along the R125.

#### Commercial

One submission seeks to rezone RU to FP to allow for the expansion of an existing food distribution business at Palmerstown, Oldtown. 2 no. submissions seek to rezone RU zoned lands at The Ward and Borranstown, Ashbourne to GE. The Borranstown lands to include a Masterplan designation.

# PART TWO

## Local Objectives for One-Off Houses and Reinstatement of Local Objectives for One-Off Houses

A number of submissions request local objectives for a total of 5 no. one-off houses. One submission requests the reinstatement of Local Objective 214: 'Provide for one house only subject to a requirement of occupancy of seven years upon the applicant.'

## Proposed Local Objectives

2 no. submissions seek additional Local Objectives. These include, i) A retirement facility on RU zoned lands at Lawn Gates immediately north of the existing rural village of Rowlestown. A change in zoning from RU to RV is also proposed in this context. ii) The inclusion of a Local Objective for Development Area 9 identified in the adopted Rowlestown LAP and VDFP whereby Phase 1 to provide for 8 houses and Phase 2 to provide for additional residential development in accordance with a future LAP for the village.

## Amend Local Objectives

One submission seeks to amend the current objective relating to unit numbers in Development Area 9 proposed in the Ballyboughal LAP from 5.8 units per hectare to 13.8 units per hectare.

## Reinstatement of Local Objectives

Reinstate Local Objective 258: 'Facilitate the existing integrated tourism and recreational complex at Roganstown. The nature and extent of the facilities provided is confined by the primary use of the site for recreation and tourism use and the need to conserve the special landscape character and heritage features of the site.'

Reinstate Local Objective 151: 'Provide for access from the N2 and L5018 subject to any necessary road improvements'.

Support for Local Objective 17 for a treatment facility for end of life vehicles.

## Replace LAP objective with Masterplan objective for Coolquay.

## Transport

A number of submissions are opposed to the proposed routing of the Swords Western By-Pass indicated on the Draft Development Plan map which traverses green belt lands near Killeek and a farmstead with a number of protected structures (RPS 636). The submission contends that the proposed routing would have serious negative impacts on the protected curtilage of this farm, effectively destroying this protected structure and would render the farm non-viable. It is requested that this route be repositioned eastwards to its original location as indicated in the Dublin Airport LAP, and routed along the proposed industry Food Park development lands. Clarity is also required as to whether any particular benefits are being accounted for with regard to the proposed routing no longer running alongside the industry zoned Keelings Fruit lands and these benefits to be cited.

## **Chief Executive's Response**

### Rezoning from RV to RS-Residential and Replace the LAP Objective with a Masterplan Objective

The purpose of the RV zoning objective is to *'Protect and promote the character of the Rural Village and promote a vibrant community in accordance with an approved local area plan and the availability of physical and community infrastructure'*.

The RV zoning provides for the integrated and long-term planning and sustainable development of the village. The Local Area Plan process is considered the most appropriate vehicle to provide a coherent sustainable planning framework for the future development of Fingal's villages. LAPs provide the frameworks to secure sustainable development that balances physical, social, economic and environmental considerations at the local level while minimising the potential adverse effects of development on the environment. LAP's also balance the needs and

## PART TWO

---

aspirations of the community with the requirements of the Planning Authority and the expectations of relevant stakeholders. LAPs promote physical and social integration and sustainable self-sufficient communities.

Rivermeade is a rural village, albeit located within the Metropolitan Area, with very limited road connections, public transport services and few other services and amenities. Despite its unique settlement history [it was essentially developed as a housing estate], poor connectivity and deficiencies in services and amenities, Rivermeade with its well-established community, its proximity to Swords and the Airport [which are key employment centres] and notable landscape quality [Rivermeade is located along the River Ward] has considerable potential to develop into a vibrant sustainable village with a degree of self-sufficiency.

The adopted Rivermeade LAP 2013 sets out the optimal long-term development strategy for the village including the RV zoned lands north of the River Ward, in tandem with the timely delivery of much needed physical infrastructure addressing existing deficits particularly road improvements, recreational facilities and local services including shops.

The overall LAP vision for Rivermeade is to transform the area into a sustainable re-generated and fully integrated village, providing for residential development in tandem with the phased delivery of much needed infrastructure, particularly roads, recreational facilities and local services. There is significant opportunity as part of the development of the LAP lands to provide for much improved physical and social infrastructure which will be of great benefit to both the existing and future residents in Rivermeade village and which will greatly improve future connections [vehicular, pedestrian and cycle] between Rivermeade village and Swords.

In this regard the LAP includes the following provisions:

- Development Area 1 identified in the adopted LAP and VDFP is the proposed village centre a key development site located opposite the primary school and adjoining the entrance to Rivermeade on lands owned by Fingal County Council and currently used as a football pitch. The development of this area for mixed uses [including retail, commercial, employment, community and residential uses] is considered a priority by Fingal County Council given the need to develop supporting services for the expanding village and its rural hinterland.
- Development Area 4 identified in the adopted LAP and VDFP provides for a Recreational Hub within the eastern part of the LAP lands adjoining the River Ward and reservoir. Provision shall be made for the development of active recreational facilities within this area including a new floodlit soccer football pitch and a floodlit mini all weather pitch. In addition provision will be made for tennis and / or basketball courts, if required, following public consultation.
- Development Area 6 where the majority of lands within this area are owned by the Council provides for improved Recreational amenities.
- Development Area 8 immediately to the north of the River Ward provides for a Sustainable Living Centre integrating with the reservoir which is proposed to be restored for recreational use.
- The LAP provides for direct and attractive pedestrian and cycle linkages along the River Ward and throughout the village. The road upgrade proposals including the shared footpath and cycle facility along both the Rivermeade Link Road and along the upgraded Killeek Lane will be a key element in connecting Rivermeade to the very attractive Ward River Valley Park

## PART TWO

---

'green route' between Swords and Rivermeade which will in time greatly improve pedestrian and cycling connections between Rivermeade and Swords.

The provisions in the adopted LAP to provide for significantly improved recreational facilities and local services were overwhelmingly well received by the community in terms of the long term sustainability of the village. All of these facilities and particularly the new village centre, recreational hub and the Sustainable Living Centre will be of great benefit to existing and future residents in Rivermeade and its rural hinterland as well as being an 'attractor' bringing in visitors particularly from Swords to the area. The LAP proposes a new internal link road and bridge crossing to facilitate access to all of the development lands north of the River Ward. This road will ensure the proper integration of existing and future residential development located to the north and south of the River Ward.

Rezoning the lands north of the River Ward to 'RS' would likely result in the development of two separate housing estates one to the north and the existing to the south with little or no proper integration which would totally undermine the overall LAP vision and objectives for the village to provide for residential development in tandem with the phased delivery of the much needed and required physical and social infrastructure, particularly roads improvements, recreational facilities and local services for the benefit to existing and future residents in Rivermeade.

It is accepted that demands for housing are high and are rising in Fingal. In response to these demands, the Council proposes to immediately commence the review of the Rivermeade LAP by advertising the first call for submissions. As part of this review the Council will undertake to reassess the residential densities in the existing LAP and to consider the appropriateness of higher densities which will help in the delivery of necessary physical and social infrastructure, particularly road improvements, expanded recreational facilities and local services for the benefit of existing and future residents in Rivermeade and this will address the meaningful concerns of the relevant submissions.

### Rezoning from RU and RC to RV

A number of submissions seek to rezone RU lands to RV in vicinity of the rural villages of Oldtown Ballyboughal, Coolquay and Rowlestown and extend the RV development boundary accordingly. A number of submissions seek to rezone RC and RU lands at Ballymadun and Thornton to RV. The Ballymadun lands to include a Masterplan objective.

The lands at Oldtown are located immediately to the east and north-west of the existing RV boundary and are currently zoned RU and equate to c.4.2 ha's./10.3acres.

The lands at Ballyboughal are located immediately to the south/east and north/east of the existing RV boundary and are currently zoned RU and equate to c. 8.3 ha's. [20.5 acres].

The lands at Rowlestown are located immediately to the north of the existing RV boundary at two locations and are zoned RU. A proposed extension of 1.8 ha's. [4.44 acres] is proposed immediately to the north of the village between the existing primary school and Rowlestown House to facilitate a nursing home facility. In addition, an extensive area of c.16.5ha's. [40 acres] is proposed northwards from the village boundary. This latter proposal would result in a potential yield of c. 100 additional dwelling units based on a density appropriate to a village setting.

The lands at Coolquay are zoned RU and extend considerably to the north and west of the existing village. A threefold increase is proposed to this existing RV of c. 71.4 ha's. [176 acres],

## PART TWO

resulting in a significant quantum of additional RV zoned lands at this location. This proposed increase would result in a potential housing yield of c. 308 no. additional units based on the application of a density appropriate to a village setting. The existing RV is largely undeveloped with c. 17 ha's. [42 acres] of undeveloped lands remaining to date. A potential housing yield of c.100 dwelling units would result from these undeveloped lands again applying a density appropriate to the village setting. There is currently no public foul mains drainage in the area.

The lands at Ballymadun comprises the existing RC [c. 15.2 ha's./37 acres] and c.25.9 ha's./64 acres of RU zoned to the north, south and west of the existing RC. There is potential for c. 40 no. additional units within the existing Ballymadun RC. The RU lands would result in a potential yield of c. 129 no. additional dwellings with an overall total of 169 dwelling units arising from this overall proposed rezoning. There is currently no public foul mains drainage in the area with limited services and limited road network.

The lands at Thornton comprises c. 0.15 ha's. [0.37 acres] of existing RC and an extensive area of c.8.35ha's./20.6 acres of RU zoned lands extending to the west of the existing RC. A potential yield of c. 50 no. additional units would result from the rezoning of these lands to RV.

The allocation of housing unit numbers for the entire County area has been thoroughly analysed and addressed in the context of the Core Strategy of the Draft Plan 2017-2023 based on the directions contained in the RPG's. The allocation of new population growth and housing numbers within Fingal's Rural Villages supports the settlement hierarchy contained within the settlement strategy as defined within the Draft Plan.

This allocation represents a fair and equitable allocation based on:

- The overall allocation for the hinterland and metropolitan areas small towns and villages.
- The evidence-based approach adopted in the Core Strategy, where Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period.
- The capacity of the rural villages to accommodate growth without compromising their essential character, and
- The strong need to avoid any further suburbanisation of the Fingal rural villages

Having examined the outstanding development potential in the identified villages, considerable development opportunity exists within these existing villages where the majority of development areas identified in the LAP's and VDFP's remain undeveloped to date and particularly in their village centres. Very limited development has occurred in the village of Oldtown with one housing development remaining unfinished. No new housing developments have occurred in Rowlestown. The current development under construction in Ballyboughal is acknowledged, however, a substantial portion of undeveloped lands remain undeveloped to date throughout the village including an unfinished housing development.

A large number of submissions seek to rezone extensive areas of RU, RC and GB lands across the County to RV. Cumulatively, this equates to a total of c.197.85 ha's. [488 acres] representing a substantial quantum of additional RV zoning across the entire County. Of this overall total quantum, the vast majority of the RU zoned [134 ha's. 332 acres] lands and all of the proposed RC [15.32 37.8 acres] proposed for rezoning to RV occurs in these six identified locations [Oldtown, Ballyboughal, Rowlestown, Coolquay, Ballymadun and Thornton] within the County and located primarily within the more remote locations of the County where infrastructure and services are absent or limited.

## PART TWO

---

The change in zoning of these lands would represent a piecemeal uncoordinated rezoning of lands for which there is no evidence based need and would lead to inappropriate and unsustainable settlement patterns of development, an extensive land take of valuable agricultural lands of which it is Council policy to protect as well as the suburbanisation of these areas.

The Draft Plan is explicit in the protection and promotion of the value of the rural area of Fingal and the Council is firmly committed to the continued protection of this valuable resource that cannot be continually eroded. The consequential impact of the gradual erosion of the agricultural resource from additional housing is discussed in detail in Chapter 5.

The majority of Rural Clusters have more limited characteristics and a more residential focus with fewer services available than the villages. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small clusters. For the most part, they will provide an opportunity for family members of existing households within the cluster to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by sub-dividing large sites.

Both Thornton and Ballymadun RC's are characterised by a small number of stand-alone houses with no services on offer in Thornton RC while Ballymadun offers very limited services. Both these RC's have limited access from county roads and lack the essential structuring elements and standard infrastructure such as public mains drainage facilities, roads, footpaths and public lighting that would warrant a change in zoning to RV. It is noted that the existing Ballymadun RC alone has an outstanding development potential for 40 no. additional housing units. There is also significant provision available in the existing rural villages across the County.

The Ministerial Planning Guidelines on Development Plans, issued under Section 28 of the Planning and Development Act 2000 state "zoning that is not responsive to or justifiable by reference to reasonable needs, or that substantially exceeds such needs, is not consistent with proper planning and sustainable development."

The Guidelines also make clear that in order to support public confidence in the planning system and the development plan, decisions to zone land must be clearly justified on the basis of established need and must support the aims and strategy of the plan taking the following specific matters into account:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage policy, including conservation of habitats and other sensitive areas.

These submissions seek residential development beyond the outer edge of the existing RV and RC zoned areas, while considerable development opportunities currently exist within the existing rural villages and rural clusters across the County. Such a development pattern would result in deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and the loss of valuable agricultural lands.

# PART TWO

These considerations have formed the core basis of the approach of the local area planning of Fingal rural villages both within the hinterland and metropolitan areas. There is no evidence based reason or planning rationale for the widespread re-zonings of RU, RC and GB zoned lands to RV across the County and specifically for the rezoning of RU and RC lands proposed within the identified areas in Oldtown, Ballyboughal, Rowlestown, Coolquay, Ballmadun and Thornton.

Such proposals would be in clear and significant contravention of the adopted Local Area Plans, the Core and Settlement Strategies of the current FDP 2011-2017 and the Draft Plan 2017-2023, the Greater Dublin Area Regional Planning Guidelines 2010 – 2022 and as such would be contrary to proper planning and sustainable development.

As stated in Chapter 5 of this report, the Council will only consider changes to the RV zoning where it can be clearly shown that this contributes significantly to the development objectives of the village. The Council considers that there is merit in rezoning the portion of RU zoned lands immediately contiguous to the RV boundary at Rowlestown to facilitate a nursing home facility. The rationale for the proposed rezoning at this specified location within Rowlestown is detailed below.

## Replace the RV LAP objective for Coolquay with a Masterplan Objective

The Local Area Plan is the principal statutory planning instrument for setting out a balanced understanding, vision and spatial strategies at the local level. It is at this level that 'place' becomes a physical, community and economic reality. LAPs provide the frameworks to secure sustainable development that balances social, economic and environmental considerations at the local level while minimising the potential adverse effects of development on the environment. LAP's promotes social integration and self- sufficient strong communities.

A good LAP balances the needs and aspirations of the community with the requirements of the Planning Authority and the expectations of relevant stakeholders. It provides a framework for delivery that guides quality and facilitates consistency in development management which is fundamental to the protection of the unique character and identity of Fingal's Rural Villages.

The Local Area Plan process is considered the most appropriate vehicle to provide a coherent sustainable planning framework for the future development of Fingal's villages. LAPs and Village Development Framework Plans will be prepared for the remaining villages. The future Local Area Plan for Coolquay will play a significant role in providing the framework that is necessary to fully endorse its role as a sustainable village with a degree of self-sufficiency. This LAP process will involve community consultation and will reflect the feedback from both submissions and face to face meetings at local consultation sessions with the local community.

## Rezoning from RU and GB lands to RC

There are currently thirty four existing Rural Clusters within the Draft Plan to cater for rural generated housing need. These Rural Clusters have a strong residential focus and are based on a small number of individual houses and typically take the form of between 5 and 15 dwellings. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small clusters. For the most part, they will provide an opportunity for family members of existing households within the cluster to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

A large number of submissions seek to rezone RU/RB/GB/HA lands to RC at the following locations across the County; Adamstown, Ballymadun, Ballough-Lusk, Balcarrick-Donabate,

## PART TWO

---

Balcarrick-Corballis, Baskin Lane/Stockhole Junction, Blackhills, Burrow-Portrane, Brownstown-Swords, Colecott, Collinstown Lane, Corduff, Curragh West, Feltrim-Malahide, Greatcommons-Lusk, Grougha, Hedgestown, Kilsallaghan, Magillstown-Swords, Middlefield-Portrane, Newpark-The Ward and Wimbletown.

The majority of these proposals are new RC's with the remainder proposing extensions to existing RC's across the County. The Council considers there is no merit in rezoning new RC's or large scale extensions to existing RC's within the County based on the rationale set out in this CE Report. The Council, will, however, consider small scale incremental additions to existing clusters to facilitate rural generated housing need. Proposals for both new RC's and extensions to existing RC's will be discussed in detail on the relevant sheets in this CE Report.

A number of submissions relevant to this Sheet 3 seeks to rezone RU zoned lands to RC at Wimbletown, Ballymadun, Colecott and Kilsallaghan. A number of submissions seek to rezone GB lands to RC at Brownstown-Swords and at Newpark-The Ward.

Ballymadun North, a proposed new RC of c.3 ha's. [7.4acres] is located to the north/east of the existing Ballymadun RC. The lands are currently zoned RU. There is no public foul mains drainage in the area. Access is via a very limited county road network.

Wimbletown South, a proposed new RC of c.1ha's. [2.4 acres] is located c. 1.2 kms to the south of the existing Wimbletown RC and the lands are currently zoned RU. There is no public foul mains drainage in the area. Access is via a very limited county road.

The lands at Colecot are located immediately contiguous to the northern boundary of the existing Colecot RC. Roughly half of the subject lands are currently zoned RC. The remaining RU zoned lands equate to 0.4 ha's. [0.98 acres] The area is currently serviced by public foul mains drainage and a relatively good road network and close to the R132 to Balbriggan. This proposed extension of 0.4 ha's. would result in a potential yield of c. 2-3 dwellings.

The lands at Kilsallaghan are located immediately contiguous to the north/western boundary of the existing Castlefarm(Kilsallaghan) RC and are currently zoned RU. An existing garden centre occupies the north/western corner of the subject lands and a gravel roadway serving the garden centre and a housing construction site traverses the subject lands. This proposed extension to the existing RC equates to 1.4 ha's. [3.4 acres] with a potential yield of c.7 no. dwellings. There is currently no public foul mains drainage in the area. The existing RC is served by the Regional Road R122 to Balbriggan. This RC is largely developed with limited potential for development.

Brownstown-Swords, a proposed new RC of c.1.4 ha's. [3.4 acres] is located within the strategic greenbelt to the west of Swords and immediately to the south/east of the existing FP zoned lands at the Ward. There is currently no public foul mains drainage in the area and a limited county road serves the area. This proposal would result in a housing yield of c.7 no. dwellings in this greenbelt location.

Newpark-The Ward, a proposed new RC of an extensive area of c.25 ha's. [61 acres] is located within the strategic greenbelt to the north of Swords. There is currently no public foul mains drainage in the area and a limited county road serves the area. This proposal would result in a significant housing yield of c. 125 no. dwellings in this greenbelt location.

The change in zoning of these lands at Wimbletown, Ballymadun, Brownstown-Swords and Newpark-The Ward as designated new Rural Clusters would represent a piecemeal

## PART TWO

---

uncoordinated rezoning of lands for which there is no evidence based need. The Ministerial Planning Guidelines on Development Plans, issued under Section 28 of the Planning and Development Act 2000, state “zoning that is not responsive to or justifiable by reference to reasonable needs, or that substantially exceeds such needs, is not consistent with proper planning and sustainable development.” The Guidelines also make clear that in order to support public confidence in the planning system and the development plan, decisions to zone land must be clearly justified on the basis of established need and must support the aims and strategy of the plan taking the following specific matters into account:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage policy, including conservation of habitats and other sensitive areas.

The zoning of these lands cannot be justified on the matters outlined above. These submissions propose residential development beyond existing RC zoning, while RC zoned lands remain undeveloped and are sufficient in area to accommodate local rural based housing need across the County. The existing designated rural clusters at Ballymadun and Wimbletown contains no public drainage but are sufficient in area to accommodate local rural based housing need. Ballymadun has the potential for c.40 no. additional dwellings while Wimbletown has potential for c.18 no. additional dwellings. These figures are however, dependent on meeting the requirements for individual on-site treatment systems. There is significant provision also available within the adjoining rural villages at Ballyboughal, Oldtown and Rowlestown and the larger urban settlement of Swords. Such a development pattern would result in deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and the loss of agricultural and green belt lands.

The quantum and location of zoned land in the County is directly influenced by the Development Plan’s Settlement and Core Strategy. The Planning and Development (Amendment) Act 2010 introduced the requirement for an evidence based ‘Core Strategy’ to be provided in Development Plans. The Core Strategy identifies the quantum and location of development for the plan period that is consistent with the regionally defined population targets and settlement hierarchy, and, which reflects the availability of existing services, planned investment, sequential development and environmental requirements. The Core Strategy sets out the specific population targets and housing requirements across the County and the elements of the settlement hierarchy thereby act as a clear framework for amendments to existing zonings. The Core Strategy must demonstrate that the development objectives in the Development Plan are consistent with the National Spatial Strategy and Regional Planning Guidelines.

Government policy as articulated by the National Spatial Strategy and the Sustainable Rural Housing: Guidelines for Planning Authorities of April 2005, classifies the rural area of Fingal as “an area under strong urban influence” where the housing requirements of the rural community should be facilitated but urban generated housing should be directed to areas zoned for residential development in cities, towns and villages. The approach is reflected in the Regional Planning Guidelines for the Greater Dublin Area. The inclusion in the Draft Plan of zoning objectives facilitating the provision of additional housing without due regard to the Core Strategy and its approach is contrary to the national and regional direction.

## PART TWO

The Swords Greenbelt is one of the most critical in the County safeguarding the innate rural value of the Fingal countryside from unsustainable settlement patterns. Any encroachment into this strategic Greenbelt area would result in coalescence and the loss of definition between urban and rural areas. The Council is fully committed to the continued protection of the Greenbelt and to allow for any additional housing in this area would seriously undermine the long standing Greenbelt policy of the Council and would be contrary to the zoning objective and vision to protect Greenbelt lands as set out in the Draft Plan and as such is contrary to proper planning and sustainable development of the area.

Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period. In conclusion, there is no evidence based need or planning rationale for the proposed zoning of new rural clusters which would be in breach of the Core Strategy of both the FDP 2011-2017, the Draft Plan 2017-2023 and the Regional Planning Guidelines 2010-2022 and as such would be contrary to proper planning and sustainable development.

However, the Council considers that there is merit in allowing for small scale incremental extensions to Colecot and Castlefarm(Kilsallaghan) RC's. Given that the existing Colecot RC is largely developed with limited potential for additional housing, existing mains drainage, a relatively good road network and the need to facilitate rural generated housing need, there is merit in permitting the small scale extension of 0.4ha's. [0.98 acres] immediately contiguous to the north of the existing RC. This proposed extension of 0.4 ha's. would result in a potential yield of c. 3 dwellings.

Notwithstanding the lack of public mains drainage in the existing Kilsallaghan RC, given the limited potential for development within the existing cluster and the need to facilitate rural generated housing need, a small incremental extension of 0.42 ha's. [1.03 acres] to the existing RC is proposed immediately to the north/west of the existing cluster to facilitate a limited number of dwellings. This proposed extension of 0.42 ha's. would result in a potential yield of c. 2 dwellings.

### Rezoning from Objective 'RU' to Objective 'RB' zoned lands at Roganstown

The selection of appropriate locations for employment uses within Fingal is determined by the principles of proper planning and sustainable development, which is a core component of the economic strategy for the County. The locations for employment and business related development are also informed by the requirements of the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 (RPGs), which provides the Settlement Hierarchy for the County. Fingal has an optimum quantum of employment zoned lands provided at appropriate locations throughout the County. A wide variety of zonings are provided for to cater for enterprise and employment opportunities across economic sectors through high technology, general enterprise and employment, food industry, heavy industry, mixed use employment, rural related business, retail warehousing, warehousing and distribution and airport related development. The block of land along the R125, to the west of Roganstown golf club is currently in agricultural use as open farm land. There are no agricultural developments on the subject lands and the lands, which are located on the outskirts of Swords, are not contiguous to any existing RB zoned lands or other non-agricultural zoned lands. As such, it is considered that the location of the proposed zoning change is not considered appropriate having regard to the character of the area and the proximity of the lands to Swords and other appropriately zoned lands which are suitable to accommodate the proposed uses outlined.

# PART TWO

---

## Commercial

The existing FP – Food Park zoned lands at Palmerstown, Oldtown are operated by Sam Dennigan & Co. Fingal County Council strongly recognises the significant contribution that this company makes to the local, regional and national economy. It is a leading fresh food supply, procurement and logistics consolidator supplying the domestic market with considerable international linkages. This company is a key local employer within rural north Fingal. The submission seeks to rezone 3.8 ha's. [9.3 acres] of 'RU' – Rural zoned lands currently in agricultural use to the north of the existing FP zoning to allow for the expansion of the existing business.

Given the long established nature of the existing business and the contribution to the economy and in particular, the local economy in terms of job creation, it is considered reasonable to allow for a change in zoning from RU to FP to cater for its future expansion. The Transportation Section of the Council notes that improvements are necessary to the existing entrance to cater for any future expansion and these improvements can be facilitated through the Development Management Process.

The RU zoned lands at The Ward equate to c. 40ha's. [98 acres] and are located between the N2 and the R135 to Ashbourne and west of The Ward RB/FP Masterplan lands [MP 3B.]. The RU zoned lands at Borranstown, Ashbourne equate to c. 24ha's. [60 acres] located to the north-east of the Ballymadun GE Masterplan lands [MP 3A.]

Fingal's Economic Strategy set out in the Draft Plan seeks to attract a range of employment types, across business and industry sectors at the most appropriate and accessible locations within the County, minimising the requirement for undue commuting and improving the quality of life for Fingal's residents. Strategic Policy 10 and objectives ED02 and ED03 of the Draft Plan seeks to promote enterprise and employment throughout the County, particularly in the growth Centres of Swords, Blanchardstown and Balbriggan.

In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach as advocated in the DoECLG Development Plan Guidelines 2007 must be applied to the zoning of land for development. In this regard, areas to be zoned should be contiguous to existing zoned development lands, a strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands and zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided). Any future zonings shall have regard to this sequential approach.

There is a more than adequate quantum of employment zoned lands within the County to accommodate any future employment growth in readily accessible locations within the County where necessary infrastructure is at an optimum. The quantum of existing undeveloped GE zoned lands currently available for development across the County is c.1218 ha's. [3009 acres]. These lands are located at highly accessible locations close to the motorway and national road network off the M50 and M1 corridors and at Damastown. The M50 corridor alone has an available and accessible landbank of c.399 ha's. [985 acres] of undeveloped GE zoned lands. The undeveloped landbank of GE and HT zoned lands at Courtlough equates to c. 57.6 ha's [142 acres]. These figures represent a substantial provision of GE zoned lands readily available for development.

The National Transport Authority, in their pre-draft submission, states that the strategic transport function of the major transport corridors should be maintained by limiting the extent

## PART TWO

---

of development which would give rise to the generation of local car-based traffic on the national road network. The M1 (&M50) are vital economic corridors for Dublin, and the east coast in general, and should not be used to facilitate development of employment which would be more appropriately developed in areas well served by existing or committed high quality public transport and/or within the key settlements of Swords, Blanchardstown or Balbriggan.

In the absence of the sequential approach, any coherent evidence based need or planning rationale for the proposed change in zoning in this rural location, the proposal to change a substantial proportion of RU lands to GE would result in an un-coordinated, ad-hoc provision of unsustainable employment lands of which there no evidence based need. The proposed zoning would be in breach of key objectives of the current FDP 2011-2017 and the emerging Draft FDP 2017-2023 and NTA policy to channel employment growth into the large urban centres of the County, aligned with existing and planned infrastructure and as such is contrary to proper planning and sustainable development.

### Local Objectives and Reinstatement of Local Objectives for One-Off Houses

The Rural Settlement Strategy as set out in the Draft Plan reflects the existing policy in the current FDP 2011-2017. The policy recognises the need to provide for housing for the rural community but limits the amount of housing in the open countryside and provides for alternative options within the rural area either in the villages or rural clusters as a more sustainable and suitable location for rural generated housing.

Allowing certain individuals to be excluded from this policy would contradict this overall approach and be contrary to the proper planning and sustainable development of the area. The inclusion of objectives facilitating one-off dwellings would allow the sale of these sites on the open market, thereby opening up the possibility of urban-generated housing development on the site. Government policy as articulated by the National Spatial Strategy and the *Sustainable Rural Housing: Guidelines for Planning Authorities* of April 2005, classifies the rural area of Fingal as “an area under strong urban influence” where the housing requirements of the rural community should be facilitated but urban-generated housing should be directed to areas zoned for new residential development in cities, towns and villages. This approach is reflected in the Regional Planning Guidelines for the Greater Dublin Area. The inclusion of objectives in the Draft Plan facilitating the development of rural housing outside of the provisions of the Rural Settlement Strategy would thus run counter to national and regional policy.

The inclusion of a map based local objective, which would be at odds with (i.e. not consistent with) the policies and objectives contained in the provisions of the relevant chapter of the Development Plan or Appendices are legally flawed and open to legal challenge. Any local objectives that render nugatory relevant policy considerations including Guidelines which specify criteria for new dwellings or eligibility for planning permission for new rural housing cannot be considered to be consistent with the sustainability principles that inform these policy considerations and adopted criteria.

There is a lack of an evidence based need or planning rationale for the inclusion of objectives providing for rural housing and as such would conflict with the policy and guidance outlined above. The exemption of certain sites from compliance with the relevant policies and guidelines would lead to an increase in the number of houses being developed in the rural area, inappropriate and unsustainable settlement patterns and the loss of the agricultural resource and as such would be contrary to proper planning and sustainable development.

# PART TWO

---

## Proposed Local Objectives

The lands at Lawn Gates, Rowlestown equates to c. 2 ha's. and are located immediately to the north of Rowlestown Village between the existing primary school and Rowlestown House. The lands are zoned RU- Agriculture where a retirement facility is not permitted in principle under the zoning objective. A change in zoning from RU to RV – Rural Village and a Local Objective to provide for a retirement facility is proposed for the subject lands. It is proposed to develop the proposed village green as per the adopted Rowlestown LAP as part of this proposal.

The Draft Plan at Chapter 3 Placemaking promotes the development of retirement facilities within urban areas where services and facilities are accessible. The Plan recognises the pressure for such facilities in rural areas, however, there is a presumption against this type of development in the open countryside for reasons relating to sustainability, poor accessibility and lack of public transport, social exclusion and isolation.

Given the contiguous location of the lands immediately to the north of the Rowlestown RV boundary where services of amenities exist, albeit at a limited scale, the planned proposals for a village green to the south of the subject lands with good connectivity to the village centre, as per the adopted Rowlestown LAP, there is merit within this proposal for a change in zoning to RV to facilitate a retirement facility. This change in zoning is considered to be a small incremental addition to the village and will facilitate the delivery of the village green resulting in a significant planning benefit to existing and future residents of the overall village. In this context, it is recommended that the subject lands be rezoned RV- Rural Village and the Rowlestown RV boundary be extended accordingly. A Retirement Facility is permitted in principle within the RV zoning objective and therefore a local objective is not considered necessary in this context.

ii)The adopted Rowlestown LAP 2012 and accompanying Village Development Framework Plan sets out a comprehensive framework for the overall planning and development of the village within the context of the Core and Settlement Strategies for the County. The proposed densities and phasing arrangements have been carefully considered in the detailed assessment undertaken as part of the Village Development Framework Plan and Design Guidance [VDFP] as they relate to the village of Rowlestown, encouraging attractive village scale development, attracting a population base to support services, enterprise and amenities, providing an alternative to one-off rural housing without encouraging and perpetuating unsustainable commuting. This approach accords with the policy contained in the RPG's relating to village development in the Metropolitan Area.

Development Area 9 as identified in the LAP and VDFP is located between Rowlestown Cottages and the former National School and includes the historic Mill complex. A total of 8 no. units are proposed for this development area within the LAP, in the context of the Core Strategy and an acknowledgement of the flood risk areas of the site.

While it is acknowledged that the development of these lands will facilitate the restoration of the Mill Complex and delivery of a section of the Riverside Park, the development of these lands requires careful consideration and a co-ordinated approach in the context of an overall LAP for the village.

In the context of the Development Plan which is a strategic document, to amend overall units no's and densities within specific sites by way of objective without any level of analysis, is not in accordance with proper planning and sustainable development of the area. Rather, it is the Local Area Plan that is the most appropriate planning vehicle in which to address any future increase in density.

# PART TWO

---

## Amend Local Objectives

The adopted Ballyboughal LAP 2012 and accompanying Village Development Framework Plan sets out a comprehensive framework for the overall planning and development of the village within the context of the Core and Settlement Strategies for the County. The proposed densities and phasing arrangements have been carefully considered in the detailed assessment undertaken as part of the Village Development Framework Plan and Design Guidance [VDFFP], as they relate to the village of Ballyboughal, encouraging attractive village scale development, attracting a population base to support services, enterprise and amenities, providing an alternative to one-off rural housing without encouraging and perpetuating unsustainable commuting. This approach accords with the policy contained in the RPG's relating to village development in the Hinterland.

Development Area 9 within the adopted Ballyboughal LAP 2012 is located on the southern extremity of the village where a density of 5.8 units per hectare is proposed. The submission seeks to increase this figure to 13.8 units per hectare. In the context of the Development Plan which is a strategic document, to specify an increased density within specific sites, without a detailed level of analysis is not in accordance with proper planning and sustainable development of the area. Rather, it is the Local Area Plan that is the most appropriate planning vehicle in which to address any future increase in potential densities.

## Reinstatement of Local Objectives

Roganstown Hotel and Country Club, Swords contains an existing Integrated Tourism Complex which was granted permission in 2000. This submission sought the reinstatement of Local Objective No. 258 (current Fingal Development Plan 2011-2017) which states: 'Facilitate the existing integrated tourism and recreational complex at Roganstown. The nature and extent of the facilities provided is confined by the primary use of the site for recreation and tourism use and the need to conserve the special landscape character and heritage features of the site.' Roganstown retains its status as an ITC and Objective ED68 continues to apply to the site. Therefore there is no requirement for the reinstatement of local objective no.258 on these lands.

Objective 151 in the current FDP 2011-2017 relates to the provision of access to a landbank of GE zoned lands at Ballymadun from the N2 and local road L5018. Specifically this objective seeks to, 'Provide for access from the N2 and L5018 subject to any necessary road improvements'. The GE zoning and Masterplan designation [MP 3.A] for these lands are carried through to the Draft Plan. The issue of access will be examined as part of the preparation of the Masterplan for these lands and within the context of a new strategic objective proposed in Chapter 7 of this report relating to the upgrade of the N2 north of Ashbourne.

This new objective seeks to 'Support and facilitate the TII, Meath County Council and Kildare County Council in the planning and delivery of the N2 Upgrade north of Ashbourne and a possible link between the M3 and M4.'

The issue of access to these lands is sufficiently catered for within the context of the future Masterplan for these lands and the proposed new strategic objective for the N2 upgrade without the need for the reinstatement of Objective 151.

Support for Local Objective 17 relating to a treatment facility for end of life vehicles within the Draft Plan is noted.

# PART TWO

---

## Transport

The route of the proposed Swords Western By-Pass is indicative only and will be subject to a detailed assessment and public consultation before commitment to any final route. In the interests of clarity, the proposed indicative route as per the current FDP Maps 2011-2017 is carried through to the Draft Plan Maps.

## **Recommendations:**

### **CE SH 3.1:**

Rezone the RU zoned lands contiguous to the northern boundary of the Rowlestown village to RV – Rural Village and extend the RV boundary accordingly (see appendices).

### **CE SH 3.2:**

Rezone the RU zoned lands contiguous to the northern boundary of the existing company of Sam Dennigan & Co to FP- Food Park.

### **CE SH 3.3:**

Rezone 0.4ha's. [0.98 acres] of RU lands to RC at Colecot RC.

### **CE SH 3.4:**

Rezone 0.42 ha's. [1.03 acres] of RU lands to RC at Castlefarm (Kilsallaghan) RC.

# PART TWO

## Sheet 4: Balbriggan

### Submissions Received During the Consultation Process

D00025, D00026, D00027, D00095, D00288, D00323, D00337, D00338, D00384, D00405, D00424, D00443, D00492, D00498, D00532, D00542, D00554, D00563, D00581, D00584, D00597, D00624, D00671, D00742, D00747

(Please see appendices for map based changes).

### Summary of Issues Raised

#### Rezoning from/to Residential (RS/RA)

A number of submissions request the rezoning of land from/to residential development in Balbriggan. These are as follows:

- RU to RA at Flemington Lane.
- RS to OS at Chapel Court.
- GB to RS at Darcystown, Balrothery.
- GB to RA and OS at Balrothery.

#### Commercial Rezonings

- RA to MC at Millfield Shopping Centre, Balbriggan (two separate submissions).
- TC to OS to rear of Main Street, Balbriggan.
- RS to MC at Chapel Street

#### Other Rezonings

A number of submissions seek various rezonings from:

- HT to GE (Jack Murphys premises, Balbriggan)
- GB to RV at Balscadden to support agri-industry.
- GB to RV at Balscadden to expand the village.
- RU to RC at lands adjoining Blackhills RC.
- GB and RU to RC at Grouga Lane, Balbriggan.

#### Local Objectives for One-off Houses

There were two submissions relating to one off houses. One submission requests a specific objective on OS lands east of School Lane, Balrothery as follows: 'To facilitate the development of a second single storey bungalow on the lands.' An oral hearing regarding this submission was also requested. The second submission requests a specific local objective "to provide for one house sensitively designed for a member of the immediate family of the land owner" on lands at Kitchenstown, Naul on HA lands.

#### Reference to Local Objectives/Specific Objectives

A number of submissions refer to Local Objectives and Specific Objectives, as follows:

- Insert Specific Local Objective for Integrated Tourism Facility at Hampton Hall. Specific Local Objective for access onto Castlelands link road with suggested wording: 'To provide for improved access to the lands at Hampton Hall by reserving a connection to the proposed inner relief Castlelands distributor road.'
- Rezone or specific objective at Hamilton Park nursing home, Balrothery for additional assisted living residences, currently zoned GB.
- Remove map based local objective no. 1 which states: 'Promote and facilitate the development of the disused factory site, to the north of the beach/harbour as a mixed

# PART TWO

---

residential, hotel, leisure and entertainment precinct with shops, cafes and restaurants overlooking the coastal park and the sea.

- Insert new Objective: 'Facilitate the development of an Islamic community centre including a mosque/place of worship and a burial ground at a suitable separate location for the Muslim community of Balbriggan.
- Request that Map based local objectives 4 and 6 remain on Sheet 4 in relation to Balrothery. This submission also refers to Objectives Balrothery 3, 5, 7-14 and these issues are addressed fully in Chapter 4.

## **Local Area Plans/Masterplans**

A submission refers to the Masterplan lands MP 4.B North West Balbriggan Masterplan. It seeks the removal of the proposed Masterplan objective as the form and layout of residential development including the provision of housing, roads and public open space are subject to current planning permissions granted by the Council. The submission also seeks the realignment of the indicative route of the proposed Balbriggan Ring Road (R122 to R132 via Flemington) to take a route on the western side of the public open space lands in north west Balbriggan; acknowledge the alternative location of a 'local centre' and amend the extent of open space zoned lands to reflect natural contours.

## **Open Space**

One submission was made in relation to proposals for The Mill Pond Park in Balbriggan.

## **Transport**

A submission requests that footpaths be provided from the M1 exit 6 to Stephenstown roundabout to make the area safe for pedestrians who currently share the road with traffic including Teccrete transporters.

## **General Issues**

A submission queries why the development boundary for Balbriggan appears to extend around several rural zoned lands. A second submission requests that the Maritime Museum be located to the Cardy Marina (beside harbour) in Balbriggan.

## **Chief Executive's Response**

### **Rezoning from/to Residential (RS/RA)**

The Fingal Settlement strategy embraces the strategic approach advocated by the Regional Planning Guidelines to physically consolidate the majority of future growth into the strong and dynamic urban centres of the metropolitan area while directing development in the hinterland to towns and villages in order to discourage dispersed development and unsustainable travel patterns. Balbriggan is identified as a Large Growth Town Level II in the Regional Planning Guidelines Settlement Hierarchy for the GDA. The Strategic settlement policy for Balbriggan is consolidation by encouraging infill development and intensification of development within appropriate locations. Development should be carefully managed to ensure their primary use is protected from encroachment, fragmentation and urban driven development. It is considered that there is a sufficient quantum of land zoned for residential purposes in Balbriggan and surrounding towns to cater for the plan period and beyond.

The quantum and location of zoned land in the County is directly influenced by the Development Plan's Settlement and Core Strategy. The Core Strategy identifies the quantum and location of development for the plan period that is consistent with the regionally defined population targets and settlement hierarchy, and, which reflects the availability of existing services, planned investment, sequential development and environmental requirements. The Core Strategy sets

## PART TWO

---

out the specific population targets and housing requirements across the County and the elements of the settlement hierarchy thereby act as a clear framework for amendments to existing zonings. The Core Strategy must demonstrate that the development objectives in the Development Plan are consistent with the National Spatial Strategy and Regional Planning Guidelines.

It is clear, based on the evidence-based approach adopted in the Core Strategy, that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period. There are areas of undeveloped RS/RA zoned land within the Balbriggan development boundary. To change GB/RU zoned lands to RS/RA zonings would deliberately erode the rural character of the area and would result in deficiencies in terms of the provisions of basic infrastructure and public services, in addition to unsustainable travel patterns and a poor quality urban environment.

### **Commercial Rezoning's**

The Fingal Retail Hierarchy has been devised having regard to the classifications of the Retail Strategy for the GDA and through ensuring consistency with the settlement hierarchy of the RPGs for the GDA. The Fingal Retail Hierarchy includes a categorisation of urban centres within the County into retailing levels, identifies the locations of each level, and the type of retail format that is considered appropriate for each level of the hierarchy. The Fingal Planning Department has undertaken analysis of planning applications and retailing trends within the County over the last several years, and completed on-the-ground-surveys of various urban and rural centres throughout the County with differing retail offer and function. Analysis of these investigations and reviews has concluded that retail provision in Fingal remains within the future allocation given to the County by the Retail Strategy for both convenience and comparison floorspace up to 2016. The Retail Planning Guidelines require the planning authorities within the GDA to prepare a multi-authority retail strategy. It is anticipated that a retail strategy for the EMRA will be required within the lifetime of the Development Plan. Due to this Ministerial requirement and mindful of the regional considerations involved in retail planning, it is considered appropriate that any quantitative indications of additional retail floorspace for Fingal over the coming Plan period be guided and determined by a new retail strategy for the EMRA. In this context, it is considered that no new MC zonings/changes to MC zonings should occur in Balbriggan.

### **Other Rezoning's**

A submission seeks a rezoning from HT to GE on industrial zoned lands in Balbriggan. The GE zoning is the largest economic development zoning in Fingal, with sufficient GE zoned lands located in Balbriggan. The HT zoning is one of the most important economic development zonings in the County and this zoning is to facilitate opportunities for major office, science and technology, and research and development based employment within high quality, highly accessible, campus style settings. Given the higher density permitted on HT zoned lands and their proximity to the town centre of Balbriggan, it is considered that the HT zoning should remain on the submission lands.

#### Rural Villages

Two separate submissions seek rezonings from GB to RV for Balscadden. A submission requests rezoning to RV in order to support growth and expansion in the Agri-Industry within the immediate area. The second submission seeks to rezone 3.1 hectares to allow the village to expand. Balscadden is a small rural village in the hinterland area located approximately 3km northwest of Balbriggan. It contains the zoning objective RV Rural Village – the objective seeks to: *'Protect and promote the character of the Rural Village and promote a vibrant community in accordance with an approved local area plan and the availability of physical and community*

# PART TWO

---

*infrastructure*.

Fingal is the principal county within the Dublin region for agricultural activities, and has a national reputation for its horticultural sector. The needs of agriculture are addressed in a comprehensive and consistent manner within the Draft Plan, particularly in Chapters 5 and 6. The importance of these sectors to the local and wider economy is recognised and the sustainable development of these sectors is promoted in the Draft Plan. The Council will continue to support and facilitate agriculture and new agricultural initiatives.

The allocation of housing unit numbers for the entire County area has been thoroughly analysed and addressed in the context of the Core Strategy of the Draft Plan 2017-2023 based on the directions contained in the RPG's. The allocation of new population growth and housing numbers within Fingal's Rural Villages supports the settlement hierarchy contained within the settlement strategy as defined within the Draft Plan.

This allocation represents a fair and equitable allocation based on:

- The overall allocation for the hinterland and metropolitan areas small towns and villages.
- The evidence-based approach adopted in the Core Strategy, where Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period.
- The capacity of the rural villages to accommodate growth without compromising their essential character, and
- The strong need to avoid any further suburbanisation of the Fingal rural villages

A large number of submissions seek to rezone extensive areas of RU, RC and GB lands across the County to RV. Cumulatively, this equates to a total of c.197.85 has. [488 acres] representing a substantial quantum of additional RV zoning across the County. The change in zoning of these lands would represent a piecemeal uncoordinated rezoning of lands for which there is no evidence based need and would lead to inappropriate and unsustainable settlement patterns of development and an extensive land take of valuable agricultural and green belt lands of which it is Council policy to protect.

The Draft Plan is explicit in the protection and promotion of the value of the rural area of Fingal and the Council is firmly committed to the continued protection of this valuable resource that cannot be continually eroded. The consequential impact of the gradual erosion of the agricultural resource from additional housing is discussed in detail in Chapter 5.

The relative control on housing development within the Greenbelt is necessary to maintain the particular rural and undeveloped nature of the Greenbelt in order to demarcate clearly the edge of established settlements, provide for the continued viability of agricultural and rural uses and promote an amenity area for citizens. The density of actual rural housing development within the Greenbelt relative to other rural areas within the County provides clear evidence of the relative success of Fingal's efforts to preserve and promote the Greenbelt. The Council is fully committed to the continued protection of the Greenbelt and the erosion of the greenbelt would seriously undermine the long standing Greenbelt policy of the Council and would be contrary to the zoning objective and vision to protect Greenbelts as set out in the current FDP 2011- 2017 and the Draft Plan 2017-2023 and as such is contrary to proper planning and sustainable development of the area.

The Ministerial Planning Guidelines on Development Plans, issued under Section 28 of the Planning and Development Act 2000 state "zoning that is not responsive to or justifiable by

## PART TWO

---

reference to reasonable needs, or that substantially exceeds such needs, is not consistent with proper planning and sustainable development.”

The Guidelines also make clear that in order to support public confidence in the planning system and the development plan, decisions to zone land must be clearly justified on the basis of established need and must support the aims and strategy of the plan taking the following specific matters into account:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage policy, including conservation of habitats and other sensitive areas.

These submissions seek residential development beyond the outer edge of the existing RV, while considerable development opportunities currently exist within the existing rural villages and rural clusters across the County. Such a development pattern would result in deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and the loss of agricultural and green belt lands. These considerations have formed the core basis of the approach of the local area planning of Fingal rural villages both within the hinterland and metropolitan areas. There is no evidence based reason or planning rationale for the widespread re-zonings of RU, RC and GB zoned lands to RV across the County. The Council will only consider changes to the RV zoning where it can be clearly shown that this contributes significantly to the development objectives of the village

### Rural Clusters

There are currently thirty four existing Rural Clusters within the Draft Plan to cater for rural generated housing need. These Rural Clusters have a strong residential focus and are based on a small number of individual houses and typically take the form of between 5 and 15 dwellings. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small clusters. For the most part, they will provide an opportunity for family members of existing households within the cluster to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

A large number of submissions seek to rezone RU/RB/GB/HA lands to RC at the following locations across the County; Adamstown, Ballymadun, Ballough-Lusk, Balcarrick-Donabate, Balcarrick-Corballis, Baskin Lane/Stockhole Junction, Blackhills, Burrow-Portrane, Brownstown-Swords, Colecott, Collinstown Lane, Corduff, Curragh West, Feltrim-Malahide, Greatcommons-Lusk, Grougha, Hedgestown, Kilsallaghan, Magillstown-Swords, Middlefield-Portrane, Newpark-The Ward and Wimbletown.

The majority of these proposals are new RC's with the remainder proposing extensions to existing RC's across the County. The Council considers there is no merit in rezoning new RC's or large scale extensions to existing RC's within the County based on the rationale set out in this CE Report. The Council, will, however, consider small scale incremental additions to existing clusters to facilitate rural generated housing need. Proposals for both new RC's and extensions to existing RC's will be discussed in detail on the relevant sheets in this CE Report.

## PART TWO

---

The submissions relevant to Sheet 4 seek to rezone RU and GB lands to RC at Grougaha and to rezone RU lands to RC at Blackhills.

Grougaha North, a proposed new RC of c.4 ha's. [9.88 acres] is located to the north of the existing Grougaha RC and to the west of Balbriggan Town. The lands are currently zoned RU and GB. The GB lands form part of the strategic green belt associated with Balbriggan. There is no public foul mains drainage in the area. Access is via a very limited county road network. It is also noted the RC at Grougaha is a new one and is included for the first time in this Draft Plan. This is based in the existing cluster of rural dwellings and is considered to meet local housing needs.

The lands at Blackhills are located immediately to the south of the existing Blackhills RC, and are currently zoned RU. A fourfold increase is proposed to this existing RC of c.8.4 ha's. [20 acres] resulting in a potential yield of c.67 dwellings. This proposed extension is a significant large scale extension, resulting in a significant quantum of additional RC zoned lands and associated housing yield at this location. This RC is largely developed with little no potential for additional housing. The area is served by public mains drainage and by a limited county road network. The Council considers that there is merit in permitting a small scale extension immediately to the south of the Blackhills RC, given there is little or no potential for additional housing development within the existing RC, the availability of services in the area and the need to facilitate rural generated housing need. A small incremental extension of 0.5ha's [1.23 acres] immediately contiguous to the south of this RC to facilitate c. 4 houses is considered reasonable.

The change in zoning of the lands at Grougaha and the extensive large scale rezoning of RU lands at Blackhills RC as designated RC [Rural Cluster] would represent a piecemeal uncoordinated rezoning of lands for which there is no evidence based need. The Ministerial Planning Guidelines on Development Plans, issued under Section 28 of the Planning and Development Act 2000, state "zoning that is not responsive to or justifiable by reference to reasonable needs, or that substantially exceeds such needs, is not consistent with proper planning and sustainable development." The Guidelines also make clear that in order to support public confidence in the planning system and the development plan, decisions to zone land must be clearly justified on the basis of established need and must support the aims and strategy of the plan taking the following specific matters into account:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage policy, including conservation of habitats and other sensitive areas.

The zoning of these lands cannot be justified on the matters outlined above. These submissions propose residential development beyond existing RC zoning, while RC zoned lands remain undeveloped and are sufficient in area to accommodate local rural based housing need across the County. There is significant provision also available within the adjoining rural village at Balscaddan and the large urban settlements of Balbriggan and Skerries. Such a development pattern would result in deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and the loss of agricultural and green belt lands.

## PART TWO

The quantum and location of zoned land in the County is directly influenced by the Development Plan's Settlement and Core Strategy. The Planning and Development (Amendment) Act 2010 introduced the requirement for an evidence based 'Core Strategy' to be provided in Development Plans. The Core Strategy identifies the quantum and location of development for the plan period that is consistent with the regionally defined population targets and settlement hierarchy, and, which reflects the availability of existing services, planned investment, sequential development and environmental requirements. The Core Strategy sets out the specific population targets and housing requirements across the County and the elements of the settlement hierarchy thereby act as a clear framework for amendments to existing zonings. The Core Strategy must demonstrate that the development objectives in the Development Plan are consistent with the National Spatial Strategy and Regional Planning Guidelines.

Government policy as articulated by the National Spatial Strategy and the Sustainable Rural Housing: Guidelines for Planning Authorities of April 2005, classifies the rural area of Fingal as "an area under strong urban influence" where the housing requirements of the rural community should be facilitated but urban generated housing should be directed to areas zoned for residential development in cities, towns and villages. The approach is reflected in the Regional Planning Guidelines for the Greater Dublin Area. The inclusion in the Draft Plan of zoning objectives facilitating the provision of additional housing without due regard to the Core Strategy and its approach is contrary to the national and regional direction. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period.

The Balbriggan Greenbelt safeguards the innate rural value of the north Fingal countryside from unsustainable settlement patterns. Any encroachment into this strategic Greenbelt area would result in coalescence and the loss of definition between urban and rural areas. The Council is fully committed to the continued protection of the Greenbelt and to allow for any additional housing in this area would seriously undermine the long standing Greenbelt policy of the Council and would be contrary to the zoning objective and vision to protect Greenbelt lands as set out in the Draft Plan and as such is contrary to proper planning and sustainable development of the area.

Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period. In conclusion, there is no evidence based need or planning rationale for the proposed zoning of new rural clusters which would be in breach of the Core Strategy of both the FDP 2011-2017, the Draft Plan 2017-2023 and the Regional Planning Guidelines 2010-2022 and as such would be contrary to proper planning and sustainable development.

### **Local Objectives for One-off Houses**

A submission requests a specific objective on OS lands east of School Lane, Balrothery as follows: 'To facilitate the development of a second single storey bungalow on the lands.' An oral hearing regarding this submission was also requested. The subject site measures approx. 0.55 acres (0.22 ha) and contains an existing dwelling. The lands are currently zoned 'OS'- Open Space in the Fingal Development Plan 2011-2017 and this zoning is retained in the Draft Plan. The OS objective states to: 'Preserve and provide for open space and recreational amenities.' The vision associated with this objective seeks to: *'Provide recreational and amenity resources for urban and rural populations subject to strict development controls. Only community facilities and other recreational uses will be considered and encouraged by the Planning Authority.'* Residential use is not permitted under the OS zoning objective and the existing dwelling is considered to be a non-

## PART TWO

---

conforming use on these lands. To the east of the site is Balbriggan Golf Club which also contains the OS zoning. The subject dwelling is located separate to the golf club. In order to regularise the existing dwelling at this location, it is considered appropriate to rezone the extent of the subject site from OS to RS.

The second submission seeks a specific objective on HA zoned lands at Kitchenstown, Naul for: “to provide for one house sensitively designed for a member of the immediate family of the land owner”.

The lands are currently zoned ‘HA’- High Amenity in the Fingal Development Plan 2011-2017 and this zoning is retained in the Draft Plan. The HA zoning objective seeks to: *‘Protect and enhance high amenity areas.’*

The vision associated with this objective seeks to: *‘Protect these highly sensitive and scenic locations from inappropriate development and reinforce their character, distinctiveness and sense of place. In recognition of the amenity potential of these areas opportunities to increase public access will be explored.’*

The Rural Settlement Strategy in the Draft Development Plan reflects the policy as set out in the current FDP 2011-2017. The policy as it stands recognises the need to provide for housing for the rural community but limits the amount of housing in the open countryside and provides for alternative options within the rural area either in the villages or rural clusters as a more sustainable and suitable location for rural generated housing. Allowing certain individuals to be excluded from this policy would contradict this overall approach and be contrary to the proper planning and sustainable development of the area. The objectives if adopted would allow the sale of sites on the open market, thereby opening up the possibility of urban-generated housing development on these sites. Government policy as articulated by the National Spatial Strategy and the *Sustainable Rural Housing: Guidelines for Planning Authorities* (2005), classifies the rural area of Fingal as “an area under strong urban influence” where the housing requirements of the rural community should be facilitated but urban-generated housing should be directed to areas zoned for new residential development in cities, towns and villages. This approach is reflected in the Regional Planning Guidelines for the Greater Dublin Area. The inclusion in the Draft Fingal Development Plan of objectives facilitating the development of rural housing outside of the provisions of the rural settlement strategy would thus run counter to national and regional policy.

It is also noted that the inclusion of a map based Local Objective, which would not be consistent with the policies and objectives contained in the provisions of the relevant chapter of the Development Plan or Appendices are legally flawed and open to legal challenge. Any local objectives that render nugatory relevant policy considerations including Guidelines which specify criteria for new dwellings or eligibility for planning permission for new rural housing cannot be considered to be consistent with the sustainability principles that inform these policy considerations and adopted criteria. There is a lack of an evidence based need or planning rationale for the objectives, therefore the inclusion of the proposed zoning would conflict with the policy and guidance outlined above. The exemption of certain sites from compliance with the relevant policies and guidelines would lead to an increase in the number of houses being developed in the rural area and inappropriate and unsustainable settlement patterns and as such would be contrary to proper planning and sustainable development.

# PART TWO

## Reference to Local Objectives/Specific Objectives

Hampton Demesne, which is located to the east of Balrothery contains Protected Structure Nos. 91 (former outbuildings of Hampton Hall) and No.92 (six-bay two-storey house, former home of Hamilton family) respectively. It is recommended that Hampton Demesne be included in the list of Integrated Tourism Complexes listed in Chapter 6 of the Draft Plan. Specific proposals for the development of an Integrated Tourism Complex at Hampton Demesne will be dealt with under the Development Management process having regard to Objectives ED68 and CH21 of the Draft Development Plan.

The lands at Hamilton Park nursing home contain the zoning objective GB Greenbelt, the objective is: 'Protect and provide for a Greenbelt.' The submission seeks a rezoning or a specific objective at Hamilton Park nursing home, Balrothery for additional assisted living residences. Although there is an existing nursing home at this location, it is considered to be a non-conforming use as Residential Care Home/Retirement Home and Retirement Village are not permitted in the GB zoning. The inclusion of a map based Local Objective, which would not be consistent with the policies and objectives contained in the provisions of the relevant chapter of the Development Plan or Appendices are legally flawed and open to legal challenge. Any local objectives that render nugatory relevant policy considerations including Guidelines cannot be considered to be consistent with the sustainability principles that inform these policy considerations and adopted criteria. The Development Management process is the most appropriate process to determine reasonable extensions on the site, specifically under Objective Z05, Chapter 11 of the Draft Plan.

Map based local objective no. 1 states: 'Promote and facilitate the development of the disused factory site, to the north of the beach/harbour as a mixed residential, hotel, leisure and entertainment precinct with shops, cafes and restaurants overlooking the coastal park and the sea. The subject site contains the zoning objective MC Major Town Centre, which states: 'Protect, provide for and/or improve major town centre facilities.' The vision for the MC zoning is: *'Consolidate the existing Major Towns in the County, (Blanchardstown, Swords and Balbriggan). The aim is to further develop these centres by densification of appropriate commercial and residential developments ensuring a mix of commercial, recreational, civic, cultural, leisure, residential uses, and urban streets, while delivering a quality urban environment which will enhance the quality of life of resident, visitor and workers alike. The zone will strengthen retail provision in accordance with the County Retail Strategy, emphasise urban conservation, ensure priority for public transport, pedestrians and cyclists while minimising the impact of private car based traffic and enhance and develop the existing urban fabric. In order to deliver this vision and to provide a framework for sustainable development, masterplans will be prepared for each centre in accordance with the Urban Fingal Chapter objectives.'* The Council's policy in relation to Balbriggan is to consolidate and enhance its retailing function balanced with the wider range of leisure, community and civic functions it offers. Having regard to the objective and vision of the MC zoning and to the prime location of this infill site within Balbriggan it is considered that map based local objective no. 1 should remain on Sheet 4.

A submission seeks the insertion of a new objective: 'Facilitate the development of an Islamic community centre including a mosque/place of worship and a burial ground at a suitable separate location for the Muslim community of Balbriggan. The merits of the submission are acknowledged. Social inclusion is embedded in the Draft Development Plan with policies in particular focused on aiming to improve access to all groups within society. The Council is committed to developing a more socially inclusive society and promoting participation and access for all. Specific objectives are contained in the Draft Development Plan for a Place of Worship, these are Objectives PM78, PM79, DMS95 and DMS96. A Place of Worship and burial

# PART TWO

---

grounds are facilitated within a number of zoning objectives in the Draft Development Plan. Development proposals for the habitual use of a building as a place of public worship or religious instruction will be considered in the context of the land use zoning and the need to protect the amenities of established uses from impacts arising from traffic, noise or other disturbance. There is considerable scope within the Draft Development Plan and through the Development Management process to facilitate the development of a place of worship and burial ground in Balbriggan. Therefore, a new objective is not considered necessary.

The Map based local objectives nos. 4 and 6 are to remain on Sheet 4 in relation to Balrothery.

## **Local Area Plans/Masterplans**

Section 3.2, Chapter 3 subsection Strategic Development Zones, Local Area Plans, Masterplans and Urban Framework Plans, outlines the range of plans to give detailed guidance for future development for specific areas of the County. These plans are a mix of statutory and non-statutory guidance documents prepared to create a vision for particular areas which must be consistent with the Development Plan and zonings. These plans are necessary to guide and inform both the community and developers as to how the area will develop. The location of certain areas for plans is dealt with in Chapters 4 and 6 of this report.

The main elements to be included in the Masterplan MP 4.B North West Balbriggan is provided for in Chapter 4, the list is not intended to be exhaustive. The preparation of Masterplans will assist in achieving quality developments in terms of, inter alia, urban design, structure, delivery of community/amenity facilities and permeability. The Draft Fingal Development Plan will identify large or key sites that will require the preparation of approved Masterplans and subsequent planning applications will be required to adhere to the approved Masterplans. Masterplans will be subject to a public consultation process and presentation to the Elected Members of the Planning Authority. The Planning Authority considers Masterplans as an effective means of guiding new development and providing essential social and infrastructure in a phased and sustainable manner. Therefore, the submission seeking the removal of Masterplan MP 4.B is not considered appropriate.

## **Open Space**

A Part 8 development was prepared earlier in 2016 for a skateboard park at Mill Pond Park, Balbriggan. As part of the public advertising for this development, reference was made to a masterplan for the immediate area being undertaken by the Parks and Green Infrastructure Division of Fingal County Council. This Masterplan will provide the opportunity for public participation and it is considered a more appropriate local level for which detailed proposals such as those contained in the submission can be considered. Notwithstanding the above, the Draft Development Plan under Chapter 4, Urban Fingal contains objectives relating to Balbriggan which include Objectives Balbriggan 10 which states; 'Promote and facilitate the development of an ecological corridor along the Matt Stream, including the Town Park west of Vauxhall Street.' It is considered that adequate open space provision has been zoned in Balbriggan and it is not recommended that additional lands are zoned at this location having regard to the topography and site constraints associated with the development of the area for open space purposes.

## **Transport**

Proposals for improved connectivity and permeability through a network of convenient and safe walking and cycling routes including pedestrian zones will be examined within the context of the various Local Area Plans, Masterplans, Urban Framework Plans and Public Realm Plans proposed in the Draft Plan for these areas. The Folkstown Little Masterplan MP 4.C will examine issues such as access, safe walking and cycling routes in the preparation of the Masterplan, which will

# PART TWO

guide development in the Stephenstown area. The associated works raised in the submission will be assessed in the planning and design of the R122 Naul Road Upgrade which is supported at Table 7.1, Chapter 7 of the Draft Plan. The Development Management Process and Capital Works Programme will also facilitate the development of pedestrian and cycling infrastructure.

## **General Issues**

Balbriggan is Fingal's only Large Growth Town and it is the largest urban centre within the hinterland area. Large Growth Towns serve as significant hubs for residential development and economic activity of both a commercial and industrial nature. They act as important self-sustaining regional economic drivers benefitting from high quality connections to Dublin City Centre. It is characterised by a young and expanding population which has rapidly grown to in excess of 20,000 people over the last two decades. Major investment by the Council and other stakeholders in the town's water services and road infrastructure has provided a basis for the town to continue to grow in a sustainable manner. Due to the constraints of the coast to the east the logical expansion of Balbriggan is to the north, west and south which includes rural zonings. The development boundary for Balbriggan which has been in place over the last number of development plan periods provides for the long-term strategic spatial vision for Balbriggan over a six year period from 2017 to 2023.

The submission requesting a maritime museum be located to the Cardy Marina is noted. Chapter 4 of the Draft Development Plan sets out objectives for the development of Balbriggan. Objective Balbriggan 4 states: 'Develop Bremore Regional Park incorporating an Active Recreational Hub including integrated sports facilities to serve Balbriggan and the surrounding area, including plans to facilitate the restoration and use of Bremore Castle, Bells Cottage, Boat House and the Martello Tower as community facilities, with a maritime museum/museum and civic facility to serve the town.' A Masterplan is currently being prepared for Bremore Regional Park by the Parks and Green Infrastructure Division. Objective Balbriggan 6 states: 'Prepare a Regeneration Strategy for Balbriggan Harbour in consultation with local fishermen, businesses and community groups having regard to its historic character subject to Screening for Appropriate Assessment.' The Masterplan process for Bremore Regional Park and the Regeneration Strategy for Balbriggan Harbour will both provide the opportunity for public participation and it is considered a more appropriate local level for which detailed proposals such as those contained in the submission can be considered.

## **Recommendation**

### **CE SH 4.1:**

Rezoned lands at School Lane, Balrothery from OS to RS

### **CE SH 4.2:**

Rezoned lands immediately contiguous to the south of Blackhills RC from RU to RC.

# PART TWO

## Sheet 5: Skerries

### Submissions Received During the Consultation Process

D00024, D00057, D00065, D00173, D00399, D00400, D00403, D00410, D00427, D00432, D00434, D00460, D00465, D00491(x 5), D00511, D00603, D00669, D00700, D00750, D00806.

(Please see appendices for map based changes).

### Summary of Issues

#### Rezoning from/to Residential (RS/RA)

A number of submissions request the rezoning of land from/to residential development. These are located at Barnageeragh, Hacketstown, Holmpatrick, and Loughshinny (three separate submissions), as follows:

- HA to RS with a specific objective for low density housing adjacent to Barnageeragh. The submission notes that part of the land was previously zoned RS under the 2005-2011 Development Plan.
- RC to RS at Curkeen Lodge, Hacketstown. (Holmpatrick RC)
- RC to RS at Hacketstown Cottages.
- RU to RS at Baldongan Road, Loughshinny for four houses.
- RU to RS at Thomastown, Loughshinny
- GE to RS at Ballykea, Loughshinny
- GB to RA at Hacketstown.
- OS to RA at Barnageeragh.

Two submissions seek to reduce the Holmpatrick Rural Cluster by rezoning from RC to RS at Curkeen Lodge and Hacketstown Cottages.

#### Local Objectives for One-off Houses

There were two submissions requesting local objectives for a total of two one-off houses. Both submissions are located on HA High Amenity zoned lands.

#### Reference to Local Objectives/Specific Objectives

A number of submissions refer to Local Objectives and Specific Objectives. One submission refers to the Map-based local objective No. 5 which seeks to: 'Prepare a Recreational Strategy for Ardgillen Demesne with an emphasis on enhancing access.'

A submission refers to the Indicative Cycle/Pedestrian Routes, some of which do not correspond with local geography, for example an indicative route crosses over the pond between Millers Lane and Greenlawns.

A submission refers to the specific objective for a 'road proposal' for the extension of the distributor road to join the Balbriggan road and a second 'road proposal' for the section of the Balbriggan road from the Barnageeragh Cove estate to the new junction with the distributor road. The proposed route would result in traffic joining the Balbriggan Road just before the worst section of road: the section between the new junction with the distributor road and the railway line.

A submission relates to the insertion of a new Local Objective at Balhavil Lane, Skerries (near Holmpatrick RC) for a 'Retirement/Nursing Home Facility, Sheltered Accommodation and Housing'. Land will also be ceded to the Council to provide a coastal walkway/amenity lands.

# PART TWO

## Local Area Plans/Masterplans

A number of submissions relate to specific Masterplans as set out under Objective Skerries 11, Chapter 4 of Draft Plan. A detailed submission refers to the Barnageeragh Masterplan MP 5.A and the integration of new development with Skerries. It is recommended that the Masterplan lands be extended to include the R127 coastal route and the Barnageeragh road link. The open space to the south and east should also be included. Completed residential areas and potential links to Kellys Lane should be within the boundary and scope of the Masterplan.

Objective SKERRIES 11: Map should refer to the need for a safe pedestrian passage to be provided as a matter of urgency along the R127 towards Skerries as well as the broader need to integrate the Barnageeragh Cove development that is nearing completion. A Local Map Based Objective should be added to Map 5 (and described in Appendix 6) to the effect of “investigate provision of a safe pedestrian walking route from Barnageeragh Cove development to the existing footpath on the R127 at the earliest opportunity”. These are consistent with facilitating the broader objectives of the Development plan and Masterplan, relating to provision of roads, a coastal walk / cyclepaths integrating the new development to local services and amenities.

Objective SKERRIES 11: Barnageeragh Masterplan & Map 5: Roads: A Local Map Based Objective should be added to Map 5 (and described in Appendix 6) to the effect of “complete construction of the Barnageeragh Link and upgrades to the R127 at Barnageeragh”, especially given the inclusion of a similar reference to the design of a Southern Relief road.

Objective SKERRIES 6: Community Infrastructure / Placemaking: It is noteworthy that one delivery model for a Swimming Pool would be to include it on vacant development lands to the south of the Barnageeragh Link connecting to the new R127 upgrade, providing easy access to the pool from Balbriggan. It is proposed that the zoning objective of this area could be altered to include such Community Infrastructure. A public pool at this location would seem to serve the local community broader population far better than within a hotel site as proposed in the Holmpatrick Masterplan and this should also be considered as an option.

Two submissions relate to the Holmpatrick Masterplan MP 5.C. A submission seeks the retention of Local Objective 10 which states: ‘Lands to be ceded to Fingal County Council as public open space.’ It also seeks to have lands rezoned from RS to RC (adjacent to Holmpatrick RC) and lands rezoned from RS to GB. The second submission considers the lands inappropriate for housing development in terms of the surrounding area and traffic implications for the R128 (Rush Road) and seeks the removal of the objective which allows for housing on these lands.

Two submissions relate to the preparation of the Milverton Masterplan MP 5.D – one submission seeks the removal of both the GE zoning and the MP 5.D relating to same, and its relocation east of the railway line at either Holmpatrick Masterplan area or at the Ballast Pit (MP 5.B) where the zoning can either replace or be incorporated into the Ballast Pit Masterplan - although with the caveat that industrial or warehousing functions covered by this zoning would not be suitable for a location in such proximity to residential estates. It would be desirable to ensure the integrity of this traditional boundary with a specific objective. For the same reasons this site would not be suitable for housing or a park and ride facility (to serve the train station), with the additional reason that such developments would result in a traffic bottleneck at the railway tunnel for residents and/or commuters at peak times. The second submission raises concerns that as the surrounding land is of outstanding natural beauty the lands should be rezoned to GB. Reference made to land quality around Skerries producing extremely high yield of crops to unique soil content, contributes to sustaining food self-sufficiency and provides wildlife habitat.

# PART TWO

---

A submission recommends a proposed LAP for Loughshinny within the lifetime of the new Development Plan.

## **Open Space**

A number of submissions have been made by Skerries Harps in relation to open space areas within Skerries, as follows:

- Change in zoning from HA to OS relating to lands owned by Skerries Harps in the Milverton area for additional training and playing facilities.
- Request exclusive use of the Townparks pitch (community centre) for the foreseeable future, drainage improvements, pitch repair, additional area for a juvenile pitch and involvement in all consultations related to the pitch in the Community Centre.
- Request exclusive use of the Kelly's Bay pitch for the foreseeable future. Increase in the number of car drop off spaces; widening of the entrance road into Kelly's Bay promenade to allow for parking and for two cars to pass at one time; extending of the current agreement for usage of the pitch;
- Barnageeragh Cove: additional pitch required in this area in the next two years.
- Holmpatrick Cove: request that open space is provided for an additional pitch exclusive to Skerries Harps.

A further submission relates to the Ballast Pit Masterplan (MP 5.B) and the proposed change of use from a recreational facility to one of mixed development at this location. The Ballast Pit is an important and vital recreational feature in the area and has been used extensively by the community and local GAA club for almost 40 years. It is a welcome and necessary amenity for the residents of Townparks, Selskar, Newtownparks and St Patrick's Close and the wider area. It is also a haven for wildlife and other flora and fauna.

## **General Issues**

A submission states that 'St. Patricks Island' was misspelt on Sheet 5.

## **Chief Executives Response**

### **Rezoning from/to Residential (RS/RA)**

The Fingal Settlement strategy embraces the strategic approach advocated by the Regional Planning Guidelines to physically consolidate the majority of future growth into the strong and dynamic urban centres of the metropolitan area while directing development in the hinterland to towns and villages in order to discourage dispersed development and unsustainable travel patterns. Skerries was identified as a Moderate Sustainable Growth Town in the Regional Planning Guidelines 2010-2022. It is considered that there is a sufficient quantum of land zoned for residential purposes in Skerries and surrounding towns to cater for the plan period and beyond.

The quantum and location of zoned land in the County is directly influenced by the Development Plan's Settlement and Core Strategy. The Core Strategy identifies the quantum and location of development for the plan period that is consistent with the regionally defined population targets and settlement hierarchy, and, which reflects the availability of existing services, planned investment, sequential development and environmental requirements. The Core Strategy sets out the specific population targets and housing requirements across the County and the elements of the settlement hierarchy thereby act as a clear framework for amendments to existing zonings. The Core Strategy must demonstrate that the development objectives in the Development Plan are consistent with the National Spatial Strategy and Regional Planning Guidelines.

## PART TWO

It is clear, based on the evidence-based approach adopted in the Core Strategy, that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period. There are areas of undeveloped RS/RA land within the Skerries development boundary which must be developed first in order to consolidate the existing urban area of Skerries.

With regard to lands adjacent to Barnageeragh zoned HA, having regard to their location immediately adjacent to the built up area of Skerries and the RS zoning immediately southeast of the subject land, it is considered appropriate to rezone lands at this location to GB.

There is merit in rezoning land at Ballykea, Loughshinny from GE to RS. The site was formerly used by Mc Nally Kitchens and the factory has since relocated. Therefore, the site is an infill site which is surrounded by RS zoned lands. In this context, it is recommended that the lands currently zoned GE be rezoned to RS.

### Local Objectives for One-off Houses

Two submissions seek one-off dwellings on HA zoned lands. The first submission relates to a site at Whites Cottages, Balbriggan Road, Skerries. There is a granny flat on the site and the submission seeks the following: 'To provide for the subdivision of existing dwelling and granny flat to two independent dwellings. The subject site is just outside the development boundary of Skerries. The second submission relates to a site at Tougher Hill, Milverton, within the vicinity of Milverton Demesne. The submission seeks to provide for a dwelling on the lands.

The lands for both submissions are currently zoned 'HA'- High Amenity in the Fingal Development Plan 2011-2017 and this zoning is retained in the Draft Plan. The HA zoning objective seeks to: *'Protect and enhance high amenity areas.'*

The vision associated with this objective seeks to: *'Protect these highly sensitive and scenic locations from inappropriate development and reinforce their character, distinctiveness and sense of place. In recognition of the amenity potential of these areas opportunities to increase public access will be explored.'*

The Rural Settlement Strategy in the Draft Development Plan reflects the policy as set out in the current FDP 2011-2017. The policy as it stands recognises the need to provide for housing for the rural community but limits the amount of housing in the open countryside and provides for alternative options within the rural area either in the villages or rural clusters as a more sustainable and suitable location for rural generated housing. Allowing certain individuals to be excluded from this policy would contradict this overall approach and be contrary to the proper planning and sustainable development of the area. The objectives if adopted would allow the sale of sites on the open market, thereby opening up the possibility of urban-generated housing development on these sites. Government policy as articulated by the National Spatial Strategy and the *Sustainable Rural Housing: Guidelines for Planning Authorities* (2005), classifies the rural area of Fingal as "an area under strong urban influence" where the housing requirements of the rural community should be facilitated but urban-generated housing should be directed to areas zoned for new residential development in cities, towns and villages. This approach is reflected in the Regional Planning Guidelines for the Greater Dublin Area. The inclusion in the Draft Fingal Development Plan of objectives facilitating the development of rural housing outside of the provisions of the rural settlement strategy would thus run counter to national and regional policy.

It is also noted that the inclusion of a map based Local Objective, which would not be consistent with the policies and objectives contained in the provisions of the relevant chapter of the

## PART TWO

Development Plan or Appendices are legally flawed and open to legal challenge. Any local objectives that render nugatory relevant policy considerations including Guidelines which specify criteria for new dwellings or eligibility for planning permission for new rural housing cannot be considered to be consistent with the sustainability principles that inform these policy considerations and adopted criteria. There is a lack of an evidence based need or planning rationale for the objectives, therefore the inclusion of the proposed zoning would conflict with the policy and guidance outlined above. The exemption of certain sites from compliance with the relevant policies and guidelines would lead to an increase in the number of houses being developed in the rural area and inappropriate and unsustainable settlement patterns and as such would be contrary to proper planning and sustainable development.

### Reference to Local Objectives/Specific Objectives

The Map-based local objective No. 5 seeks to: 'Prepare a Recreational Strategy for Ardgillen Demesne with an emphasis on enhancing access.' The provision of accessible open space is an integral part of the provision of high-quality green infrastructure for communities and forms a core element in the Green Infrastructure Strategy for the County. In addition, there are a number of objectives throughout the Draft Development Plan which seek to promote and facilitate improved pedestrian and cycle networks and the recreational trails network throughout the County. These include Objectives ED61, and ED63-67. A long-standing objective of the Fingal Development Plan is the development of the 'Fingal Coastal Way' a strategic greenway for pedestrians and cyclists along the coastal corridor from Howth to Balbriggan. An audit of existing trails including 'rights of way' will form part of the planning and development of the strategic greenway of the 'Fingal Coastal Way'. The Recreational Trails Plan will include a public consultation process where relevant stakeholders and interested parties will have an opportunity to make submissions. Any parties interested in walking and cycling trail development in the County will have an opportunity to make submissions in this regard and will be considered in the context of the Recreational Trails Plan.

The promotion of walking and cycling as an efficient, healthy and environmentally friendly sustainable mode of transport is explicit in the Draft Plan. The objectives of the *National Cycle Policy Framework (NCPF) (2009)* and the NTA's *Greater Dublin Area Cycle Network Plan* are incorporated into the Draft Plan and are promoted in various objectives. The Council will work in cooperation with the NTA to implement the *Greater Dublin Area Cycle Network Plan* subject to detailed engineering design and the mitigation measures presented in the SEA and Natura Impact Statement accompanying the NTA Plan. Indicative cycle and pedestrian routes are shown on the Development Plan maps for the entire County. These routes are indicative and will require more detailed design on a route by route basis and will be subject to a public consultation process.

Reference is made to specific road proposals in the Skerries area at Barnageeragh. The indicative road proposals indicated on Sheet 5 will be subject to detailed engineering design and a public consultation process to determine the final route selection.

The insertion of a Local Objective for a 'Retirement/Nursing Home Facility, Sheltered Accommodation and 20 detached residential units' at Balhavil Lane, Skerries is not considered appropriate. Chapter 3 of the Draft Plan recognises that the provision of residential care is an essential community requirement. Although there has been pressure for such facilities in rural areas, there is presumption against this type of development in the open countryside for reasons relating to sustainability, poor accessibility and lack of public transport, social exclusion and isolation. Best practice dictates that residential care, retirement and nursing homes should be located in built-up areas and should be located close to shops and other community facilities

## PART TWO

---

required by the occupants, and should be easily accessible to visitors, staff and servicing traffic. Objective PM43 specifically requires that residential care homes, retirement homes, nursing homes and retirement villages be located in towns and villages for reasons of sustainability, accessibility, social inclusion, and proximity to the availability of services, except where a demonstrated need to locate in a rural environment because of the nature of the care required can be clearly established. The proposed uses included in the Local Objective are not permitted under the GB and HA zonings on site. The inclusion of a map based Local Objective, which would not be consistent with the policies and objectives contained in the provisions of the relevant chapter of the Development Plan or Appendices are legally flawed and open to legal challenge. Any local objectives that render nugatory relevant policy considerations including Guidelines cannot be considered to be consistent with the principles that inform these policy considerations and adopted criteria. There is a lack of an evidence based need or planning rationale for the objective, therefore the inclusion of the proposed objective would conflict with the policy and guidance outlined above.

### **Local Area Plans/Masterplans**

The merits of the submissions relating to specific Masterplans are acknowledged. The main elements to be included in the Masterplans for Skerries are provided for in Chapter 4, the list is not intended to be exhaustive. The preparation of Masterplans will assist in achieving quality developments in terms of, inter alia, urban design, structure, delivery of community/amenity facilities and permeability. The Draft Fingal Development Plan will identify large or key sites that will require the preparation of approved Masterplans and subsequent planning applications will be required to adhere to the approved Masterplans. The Masterplans for the area will address issues such as enhanced permeability and connectivity within Masterplan lands and adjoining areas. Masterplans will be subject to a public consultation process and presentation to the Elected Members of the Planning Authority. The Planning Authority considers Masterplans as an effective means of guiding new development and providing essential social and infrastructure in a phased and sustainable manner.

In relation to the Barnageeragh Masterplan MP 5.A, while it is noted that a planning permission F05A/1818 is in place on the site which deals with the holistic development of the area, it is considered appropriate that the requirement for a Masterplan be retained on Sheet 5, pending implementation of said planning permission. It is noted that the OS zoning as proposed in the Draft Development Plan does not align with the original landscape and open space proposals for the overall lands and may prejudice the overall phased delivery of Open Space in tandem with residential development. It is also noted there is a portion of lands between the Coast Road and Barnageeragh which is zoned HA and functions as Open Space.

With respect to recent planning activity in the Barnageeragh area, landscaping plans that include playing pitches are currently going through the transfer procedure from the Developer to Council. The Barnageeragh development will tie-in to the R127. The detailed design of the junction is currently being discussed between the developer and the Council, but is subject to some difficult constraints. Any additional walking routes should be investigated as part of a MasterPlan but not included in the CDP.

Indicative cycle and pedestrian routes are shown on the Development Plan maps, these routes are indicative and will require more detailed design on a route by route basis and will be subject to a public consultation process. Walking and cycling routes are dealt with in Chapter 6 of the Plan as part of the Recreational Trails Plan and will also be subject to public consultation. As such it is not considered that additional routes should be added to the Development Plan maps.

# PART TWO

---

In relation to Holmpatrick Masterplan MP 5.C, lands have been identified to meet the needs of the County over the duration of the Plan period in line with the Core Strategy and County Settlement Strategy. The preparation of Masterplans has been identified to assist in achieving quality developments in terms of, inter alia, urban design, structure, delivery of community/amenity facilities and permeability. Subsequent planning applications will be required to adhere to the approved Masterplans. Each application for permission is then assessed on its own merits having consideration to range of considerations (such as the need for high quality design at this sensitive location) including those issues outlined in the above submission with opportunity for public engagement in the process.

With regard to the Milverton Masterplan MP 5.D it is considered that the existing long established GE zoning which forms part of the consolidated town is appropriate and necessary to facilitate the future employment potential of Skerries and as such should be retained in its current format. Furthermore, the preparation of the Milverton master plan is necessary to provide a framework for the future development of these lands which ensures the provision of integration to the zoned lands at Ballast Pit. The traditional boundary at this location will be examined in the context of preparing the masterplan.

It is not considered appropriate to prepare a Local Area Plan for Loughshinny as given the built out nature of Loughshinny, it is not considered that a further land use plan for the area is necessary with future development proposals most appropriately dealt with through the development management process. The Development Strategy for Loughshinny is set out in Chapter 4, with a number of objectives in order to achieve this strategy.

## **Open Space**

The Council will fully engage with all community groups/sports organisations in the provision of open space for recreational purposes within the County. While the Council acknowledges the submissions seeking exclusive use of certain pitches in Skerries, it is not considered to be in the best interests of the community to limit the use of recreational facilities to one group/organisation at the expense of other groups within the community. This is explicitly set out in Objective PM53 as follows: 'Ensure intensive recreational/amenity facilities are not used exclusively by any one group.'

Chapter 4 of the Draft Development Plan sets out a number of objectives to address recreational issues in Skerries, as follows: Objective Skerries 5: 'Prepare a Recreational Strategy for open space lands at Kellys Bay, Mourne View, and Skerries Rock'; Objective Skerries 8 states: 'Prepare an Urban Framework Plan to guide and inform future development of the harbour area incorporating mixed-use development including community/recreational and marina/water sports facilities with improved accessibility including enhanced off-street car-parking. Both of these objectives will provide an opportunity for the public and interested parties to participate in the location of recreational activities in Skerries. Masterplans for Barnageeragh (MP 5.A) and Holmpatrick (MP 5.C), both named in the submission, are provided for in the Draft Development Plan. With respect to recent planning activity in the Barnageeragh area, the landscaping plans that include playing pitches are currently going through the transfer procedure from the developer to the Council.

With regard to parking and set down area for Skerries Harps, this is a matter for the Operations Department and not for the Draft Development Plan.

The importance of the Ballast Pit as a recreational amenity in Skerries is acknowledged with the inclusion of the following elements in the proposed Ballast Pit Masterplan MP 5.B: 'Facilitate

# PART TWO

---

mixed use development requiring the inclusion of community/recreational uses and park and ride facilities to serve the railway station. The Masterplan will be subject to a public consultation process.

It is noted that the OS zoning as proposed in the Draft Development Plan does not align with the original landscape and open space proposals for the overall lands and may prejudice the overall phased delivery of Open Space in tandem with residential development.

## **General Issues**

The submission relating to the misspelling of 'St Patricks Island is noted, and will be amended accordingly.

## **Recommendation**

### **CE SH 5.1:**

Rezone lands at Ballykea, Loughshinny from GE to RS

### **CE SH 5.2:**

Rezone lands adjacent to Barnageeragh from HA to GB.

### **CE SH 5.3:**

Rezone lands in Barnageeragh from OS to RA and HA to OS.

### **CE SH 5.4:**

Amend spelling on Sheet 5 to read 'St Patrick's Island.'

# PART TWO

## Sheet 6A: Lusk

### Submissions Received During the Consultation Process

D00054, D00072, D00096, D00233, D00244, D00448, D00461, D00463, D00541, D00567, D00574, D00576, D00602, D00688, D00702, D00741, D00803, D00931.

(Please see appendices for map based changes).

### Summary of Issues

#### Rezoning from/to Residential (RS/RA)

A number of submissions request the rezoning of land from/to residential development. These are located at Chapel Farm, Station Road, The Green and Minister's Road as follows:

- RU to RS at Chapel Farm
- RU to RA at Station Road
- RB to RS at 'The Green'
- GE to RS at Minister's Road.

#### Commercial Rezonings

Three submissions were received seeking commercial rezonings as follows:

- CI to TC at Church Road.
- TC to CI – these include Devine's Cottage, Katie Hunt sites and the former Carnegie Community hall site/adjoining 1916 Memorial site.
- RU to CI in order to build a nursing home/community facility at Baleally Lane, Lusk. (1.76 hectares)

#### Rural Clusters

A number of submissions relate to Rural Clusters, as follows:

- RU to RC to west of the Corduff RC to allow for an additional dwelling.
- RU to RC to expand the Great Common RC.
- RU to RC at Collinstown Lane (immediately to the west of Great Common RC).
- RU to RC at Ballough. Ballough is zoned RB Rural Business.

#### Local Area Plans/Masterplans

A submission recommends the re-instatement of Objectives 179 and 185 and the Core Retail Area of Lusk to be extended to include Station Road Masterplan Lands.

#### Open Space

A number of submissions relate to an Active Recreational Hub for Lusk, with proposed locations identified in some of the submissions. A submission also seeks to include an 11-acre site at Remount/Rush roundabout which was previously approved/earmarked by the Council for a sports development to be 'ring-fenced' as Class 1 Open Space for the benefit of the whole community.

A submission was made by the Rush and Lusk ETNS which states the need for additional recreational facilities to support the existing school and highlights the importance of the delivery of the full 'Lusk Recreational Hub/Lusk North Town Park'. In relation to access to schools on Raheny Lane it is indicated that vehicular access is limited & congested and it is requested that the Plan considers the provision of parking near RaLET, either in conjunction with the parking for the Recreational Space or at the disused water treatment plant next door to the school. Likewise,

# PART TWO

the improvement of pedestrian and cycle links on the roads feeding into Raheny Lane are identified as a priority.

## **Transport**

The submission seeks a map based local objective to facilitate a study to determine the optimum location of a segregated cycle path that would allow safe access for cyclists between Lusk and Lusk train station.

## **General Issues**

A submission outlines a broad range of priorities for Lusk ranging from economic development to infrastructural priorities over the coming years, in the context of community facility requirements. The majority of the requests are dealt with elsewhere throughout this report with the remaining elements addressed hereunder. The following is sought;

- Residential development to be incremental in line with service provision.
- Urban Framework Plan is welcomed.
- Community requirements.
- Car parking.
- Prioritise ongoing economic development for Lusk. In this regard, promote tourism facilities, sporting and recreational facilities.
- Restoration of Balleally Landfill for open space and recreational uses.
- Improve linkages.
- Preservation of the historic architectural resources of Lusk to be prioritised.
- Objective Lusk 8 to be amended to delete the reference to the 're-thatch'.

A second submission recommends rezoning the lands zoned for residential development outside of Lusk Bypass back to rural use with the Lusk development boundary located within the bypass and not extending beyond it. It also recommends limiting industrial land zoning in Lusk and North Fingal and rezoning some of the industrial zoned lands back to agricultural use.

## **Chief Executives Response**

### **Rezoning from/to Residential (RS/RA)**

Table 2.6 in Chapter 2 of the CE's Draft Plan sets out the remaining zoned residential capacity from the current Fingal Development Plan 2011-2017. As of mid-2015, there were approx. 1,461 ha of zoned land available within the County with the potential to deliver approx. 43,041 residential units. Tables 2.4 and 2.5 of the CE's Draft Plan set out the RPG population and housing targets for Fingal together with the number of residential units required in Fingal to meet those targets. The existing number of units in the County as of July 2015 was 105,392 and based on the estimated RPG target of 145,340 for 2023, the number of units required to meet the RPG target is 39,948 units. It is therefore clear, based on the evidence-based approach adopted in the Core Strategy, that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period. There is therefore no requirement to zone this 'RU' zoned land to 'RA'.

The quantum and location of zoned land in the County is directly influenced by the Development Plan's Settlement and Core Strategy. The Core Strategy identifies the quantum and location of development for the plan period that is consistent with the regionally defined population targets and settlement hierarchy, and, which reflects the availability of existing services, planned investment, sequential development and environmental requirements. The Core Strategy sets out the specific population targets and housing requirements across the County and the elements of the settlement hierarchy thereby act as a clear framework for amendments to existing zonings. The Core Strategy must demonstrate that the development objectives in the

# PART TWO

Development Plan are consistent with the National Spatial Strategy and Regional Planning Guidelines.

The Ministerial Planning Guidelines on Development Plans, issued under Section 28 of the Planning and Development Act 2000, state that *'zoning that is not responsive to or justifiable by reference to reasonable needs, or that substantially exceeds such needs, is not consistent with proper planning and sustainable development.'* The Guidelines also make clear that in order to support public confidence in the planning system and the Development Plan process, decisions to zone land must be clearly justified on the basis of established need and must support the aims and strategy of the plan taking the following specific matters into account:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage policy, including conservation of habitats and other sensitive areas.

The Fingal Settlement strategy embraces the strategic approach advocated by the Regional Planning Guidelines to physically consolidate the majority of future growth into the strong and dynamic urban centres of the metropolitan area while directing development in the hinterland to towns and villages in order to discourage dispersed development and unsustainable travel patterns. Lusk was identified as a Moderate Sustainable Growth Town in the Regional Planning Guidelines 2010-2022. It is considered that there is a sufficient quantum of land zoned for residential purposes in Lusk and surrounding towns to cater for the plan period and beyond.

The location of residential zoned lands in Lusk is guided by Objective Lusk 7, which states: *'Ensure that existing and future development is consolidated within well-defined town boundaries to maintain the distinct physical separation of Lusk and Rush.'* The Draft Plan is explicit in the protection and promotion of the value of the rural area of Fingal and the Council is firmly committed to the continued protection of this valuable resource that cannot be continually eroded.

## **Commercial rezonings**

The subject site is located within the northern boundaries of Lusk along Chapel Street. St MacCullin's Church, Chaplain's House, and the Former Lusk National School form part of the northern entrance. The lands which are subject to the proposed rezoning are currently zoned TC under the Fingal Development Plan 2011-2017. The Chief Executive agrees with the proposed rezoning of the lands from 'CI' to 'TC', which reflects the location of these sites within the town centre and the Council's policy of consolidation. It is therefore recommended that the lands be rezoned from 'CI' to 'TC'.

A submission from Lusk Community Council outlines a broad range of priorities for Lusk ranging from economic development to infrastructural priorities over the coming years, in the context of community facility requirements. The majority of the requests are dealt with elsewhere throughout this report those relating to rezonings are dealt with here. It is recommended to rezone a number of sites within Lusk from 'TC' to 'CI' – these include Devine's Cottage, Katie Hunt sites and the former Carnegie Community hall site (Protected Structure No. 303). It is proposed to zone both Devine's Cottage and the Katie Hunt sites as CI- Community Infrastructure providing for a common CI zoning stretching from the Square, through the Graveyard including

## PART TWO

---

the Tower and St. Macullin's Centre to Katie Hunt's site. This area would constitute a strategic space for the development of community, social and cultural facilities for Lusk. It is proposed that the Carnegie Library Community Hall site and the adjoining 1916 Memorial Site be zoned CI-Community Infrastructure to reflect existing usage.

It is recommended that these sites should remain as 'TC' Town Centre, as the TC zoning objective already allows for community, social and cultural facilities.

The rezoning of lands from RU to CI at Baleally Lane is not recommended. The proposed site is located outside the development boundary of Lusk and would result in unsustainable development. The Council recognises that the provision of residential care is an essential community requirement. Best practice dictates that residential care, retirement and nursing homes should be located in built-up areas and should be located close to shops and other community facilities required by the occupants, and should be easily accessible to visitors, staff and servicing traffic. Relevant objectives are PM43 – 44 and DMS46-48. The proposed rezoning from RU to CI would contravene the stated policies and objectives for residential care.

### Rural Clusters

There are currently thirty four existing Rural Clusters within the Draft Plan to cater for rural generated housing need. These Rural Clusters have a strong residential focus and are based on a small number of individual houses and typically take the form of between 5 and 15 dwellings. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small clusters. For the most part, they will provide an opportunity for family members of existing households within the cluster to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

A large number of submissions seek to rezone RU/RB/GB/HA lands to RC at the following locations across the County; Adamstown, Ballymadun, Ballough-Lusk, Balcarrick-Donabate, Balcarrick-Corballis, Baskin Lane/Stockhole Junction, Blackhills, Burrow-Portrane, Brownstown-Swords, Colecott, Collinstown Lane, Corduff, Curragh West, Feltrim-Malahide, Greatcommons-Lusk, Grougha, Hedgestown, Kilsallaghan, Magillstown-Swords, Middlefield-Portrane, Newpark-The Ward and Wimbletown.

The majority of these proposals are new RC's with the remainder proposing extensions to existing RC's across the County. The Council considers there is no merit in rezoning new RC's or large scale extensions to existing RC's within the County based on the rationale set out in this CE Report. The Council, will, however, consider small scale incremental additions to existing clusters to facilitate rural generated housing need. Proposals for both new RC's and extensions to existing RC's will be discussed in detail on the relevant sheets in this CE Report.

A number of submissions relevant to this Sheet 6 seeks to rezone RU zoned lands to RC at Ballough-Lusk, Corduff, Collinstown Lane and Greatcommons-Lusk.

Ballough-Lusk, a proposed new RC of c.0.22 ha's. [0.5acres] is located to the west of Lusk and north of the existing Ballough RB. The lands are currently zoned RU. There is no public foul mains drainage in the area. The lands access onto a county road which is in close proximity to the junction with the R132 Regional Road to Balbriggan.

## PART TWO

Corduffhall, a proposed new RC of c. 1.3ha's. [3.2 acres] is located to the south of the existing Corduff RC. The lands are currently zoned RU. There is no public foul mains drainage in the area. These lands adjoin the R132 Regional Road to Balbriggan.

Collinstown Lane, a proposed new RC of c.1.2 ha's. [2.9 acres] is located to the north of Lusk and to the west of the existing Greatcommons RC. The lands are currently zoned RU. There is no public foul mains drainage in the area. The lands access onto a county road which is in close proximity to the junction with the R127 Regional Road to Skerries. The entire area of this proposed RC is taken up by the proposed pipe corridor for the Greater Dublin Drainage Scheme [GDDS].

The lands at Greatcommons-Lusk are located to the south and west of the existing Greatcommons RC. The lands are currently zoned RU. The existing RC equates to c.12.1 ha's. [29.89 acres] and is one of the larger rural clusters in the County. The area is served by public mains drainage and a very limited county road network. The proposed extension to this existing RC equates to 2.3 ha's. [5.6 acres], resulting in a potential yield of c.18 additional dwelling units. Given the extent of the existing RC and the considerable development potential for c. 44 no. dwelling units that still currently exists within the existing Greatcommons RC, it is considered there is no merit in extending this existing cluster.

The change in zoning of these lands at Ballough-Lusk, Corduff, Collinstown Lane and Greatcommons-Lusk to RC-Rural Cluster would represent a piecemeal uncoordinated rezoning of lands for which there is no evidence based need. The Ministerial Planning Guidelines on Development Plans, issued under Section 28 of the Planning and Development Act 2000, state "zoning that is not responsive to or justifiable by reference to reasonable needs, or that substantially exceeds such needs, is not consistent with proper planning and sustainable development." The Guidelines also make clear that in order to support public confidence in the planning system and the development plan, decisions to zone land must be clearly justified on the basis of established need and must support the aims and strategy of the plan taking the following specific matters into account:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage policy, including conservation of habitats and other sensitive areas.

The zoning of these lands cannot be justified on the matters outlined above. These submissions propose residential development beyond existing RC zoning, while RC zoned lands remain undeveloped and are sufficient in area to accommodate local rural based housing need across the County. The existing Greatcommons and Corduff RC's have significant outstanding provision of 44 and 45 no. housing units respectively to facilitate rural generated housing need. There is significant provision also available within the adjoining settlement of Lusk. Such a development pattern would result in deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and the loss of agricultural and green belt lands.

The quantum and location of zoned land in the County is directly influenced by the Development Plan's Settlement and Core Strategy. The Planning and Development (Amendment) Act 2010

# PART TWO

introduced the requirement for an evidence based 'Core Strategy' to be provided in Development Plans. The Core Strategy identifies the quantum and location of development for the plan period that is consistent with the regionally defined population targets and settlement hierarchy, and, which reflects the availability of existing services, planned investment, sequential development and environmental requirements. The Core Strategy sets out the specific population targets and housing requirements across the County and the elements of the settlement hierarchy thereby act as a clear framework for amendments to existing zonings. The Core Strategy must demonstrate that the development objectives in the Development Plan are consistent with the National Spatial Strategy and Regional Planning Guidelines.

Government policy as articulated by the National Spatial Strategy and the Sustainable Rural Housing: Guidelines for Planning Authorities of April 2005, classifies the rural area of Fingal as "an area under strong urban influence" where the housing requirements of the rural community should be facilitated but urban generated housing should be directed to areas zoned for residential development in cities, towns and villages. The approach is reflected in the Regional Planning Guidelines for the Greater Dublin Area. The inclusion in the Draft Plan of zoning objectives facilitating the provision of additional housing without due regard to the Core Strategy and its approach is contrary to the national and regional direction. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period.

Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period. In conclusion, there is no evidence based need or planning rationale for the proposed zoning of new rural clusters which would be in breach of the Core Strategy of both the FDP 2011-2017, the Draft Plan 2017-2023 and the Regional Planning Guidelines 2010-2022 and as such would be contrary to proper planning and sustainable development.

## Local Area Plans/Masterplans

The re- instatement of Objectives 179 and 185 is considered appropriate in the context of the Station Road Master Plan, and this recommendation has been included in Chapter 4. In relation to the Core Retail Area of Lusk, it is a recommendation in Chapter 6 that Lusk be re-classified as a Level 4 centre in Table 6.1 Fingal Retail Hierarchy. Core Retail Areas for Level 4 centres are not included in Chapter 6, as such it is considered appropriate to remove Figure 6.8 Lusk Core Retail Area from this chapter.

## Open Space

The merits of the submissions are acknowledged. The Draft Development Plan already provides the policy support for the development of an active Recreational Hub to serve Lusk and the surrounding area. The Active Recreational Hub will be provided to the north of the relief road and is identified on Sheet 14 Green Infrastructure 1 under the Mapped Objective GIM1: 'Provide new Active Recreation Hubs in Bremore Regional Park, St. Catherine's Park (Rush), Lusk, Donabate, Mooretown/Oldtown (Swords), Drinan, Baldoyle Racecourse Park and Phoenix Park Racecourse.' Provision is also made in Chapter 4 of the Draft Plan under Objective Lusk 6: 'Develop an active Recreational Hub to serve Lusk and the surrounding area.' The second issue raised is addressed in the Draft Development Plan, chapter 4 Urban Fingal under Objective Lusk 11, which identifies the North Lusk Masterplan MP6A which provides for three elements, one of which is relevant to the submission:

# PART TWO

## **North Lusk Masterplan**

*Ensure the preparation of the Masterplan facilitates the development of the lands for the development of a secondary school, community facilities, playing pitches, park land and residential Development to enable comprehensive Development of the lands in a proper manner and Development is phased accordingly to ensure Development of facilities occurs in tandem with the residential Development.* Together, these Draft Development Plan commitments are considered to address the issues relating to the RALET submission and recreational activities, including sports areas in and around the Lusk area. Other elements of the submission are dealt with in Chapters 4 and 8.

The merits of the submission are acknowledged and in this regard each Local Area Plan includes a comprehensive phasing mechanism to ensure development of facilities occurs in tandem with residential development. The Plan already provides the policy support for the development of an active Recreational Hub to serve Lusk and the surrounding area. Access to Rush Lusk ETNS is being dealt with as part of the planning for a new school on the campus, which will increase the length of set-down area. It should be noted that a set-down area has also been constructed within the existing school.

## **Transport**

The promotion of walking and cycling as an efficient, healthy and environmentally friendly sustainable mode of transport is explicit in the Draft Plan. The objectives of the *National Cycle Policy Framework (NCPF) (2009)* and the NTA's *Greater Dublin Area Cycle Network Plan* are incorporated into the Draft Plan and are promoted in various objectives. The Council will work in cooperation with the NTA to implement the *Greater Dublin Area Cycle Network Plan* subject to detailed engineering design and the mitigation measures presented in the SEA and Natura Impact Statement accompanying the NTA Plan. Indicative cycle and pedestrian routes are shown on the Development Plan maps for the entire County. These routes require more detailed design on a route by route basis and will be subject to a public consultation process. An indicative cycle/pedestrian route is indicated on Sheet 6 linking Lusk Village to Lusk railway station. The Draft Development Plan also supports such an objective, under Objective Lusk 9 which states: 'Create pedestrian/cycle links between Lusk and Balleally; and Lusk and the railway station.'

## **General Issues**

The merits of the submission are acknowledged and in this regard each masterplan includes a comprehensive phasing mechanism to ensure development of facilities occurs in tandem with residential development. The Plan already provides policy support for a range of the issues outlined including a commitment to protect and conserve the special character of the historic core of Lusk including the area of archaeological potential in the centre of the Town. It is intended that the development of a heritage trail and Recreational Hub to serve Lusk and the surrounding area will contribute towards the future economic development potential of the town and facilitate tourism, sporting, recreational and amenity facilities.

Lusk is identified as a Moderate Sustainable Growth Town under the Regional Planning Guidelines 2010-2022. In recent years it has grown from a village to a small town. In order to plan for the future growth of the town sufficient residential zoned lands are required within the lifetime of the Draft Development Plan. The lands referred to in the submission include the RS zoned land to the east of Lusk and the North Lusk Masterplan MP 6.A lands. The Masterplan lands will provide for larger family type houses to facilitate the upgrading of homes for families of existing two and three bedroom houses. The residential lands are strategically positioned to take full advantage of their proximity to the Lusk bypass and to Lusk Train Station. They will

## PART TWO

---

ensure the consolidation of the town and reduce urban sprawl. As such it is important that these lands remain within the Lusk development boundary.

The selection of appropriate locations for employment uses within Fingal is determined by the principles of proper planning and sustainable development, which is a core component of the economic strategy for the County. The Plan's policy and objectives associated with sustainable economic development are outlined in Section 6.2 of Chapter 6 and include appropriately locating intensive employment uses adjacent to public transport networks, and where appropriate, residential developments, encouraging existing economic clusters and developing new clustering opportunities, and regenerating inefficiently performing business and industrial parks, land, and buildings. The locations for employment development are also informed by the requirements of the *Regional Planning Guidelines for the Greater Dublin Area 2010-2022* (RPGs), which provides the Settlement Hierarchy for the County. The RPG's identify a Metropolitan Area and a Hinterland Area within Fingal, and define specific policies relevant for each Area. Lusk, located in the Hinterland Area has seen substantial population growth, with rail connectivity to Dublin City an important factor in the scale of its development. Importantly, Lusk has not experienced levels of sustainable employment development that would be desirable following such population expansion. It is therefore necessary in relation to the economic strategy for the Hinterland Area to strengthen and diversify the economic base of Lusk in accordance with the Settlement Hierarchy. In this regard it is important to ensure that sufficient employment generating lands are zoned within the lifetime of the development plan period.

### **Recommendation**

#### **CE SH 6a.1:**

Rezone CI to TC at Church Road, Lusk.

# PART TWO

## Sheet 6B: Rush

### Submissions Received During the Consultation Process

D00038, D00041, D00042, D00047, D00055, D00062, D00074, D00076, D00077, D00079, D00080, D00081, D00082, D00083, D00084, D00085, D00086, D00087, D00088, D00089, D00091, D00092, D00093, D00096, D00097, D00098, D00099, D00100, D00101, D00102, D00103, D00104, D00105, D00106, D00107, D00108, D00109, D00110, D00111, D00112, D00113, D00114, D00115, D00116, D00117, D00118, D00119, D00120, D00121, D00122, D00123, D00124, D00125, D00126, D00127, D00130, D00132, D00133, D00134, D00135, D00136, D00137, D00138, D00139, D00140, D00141, D00142, D00143, D00144, D00145, D00146, D00147, D00148, D00149, D00150, D00151, D00152, D00153, D00154, D00155, D00156, D00157, D00159, D00160, D00161, D00162, D00165, D00166, D00167, D00168, D00169, D00175, D00176, D00177, D00178, D00179, D00180, D00181, D00192, D00195, D00196, D00199, D00200, D00201, D00202, D00203, D00204, D00205, D00206, D00207, D00208, D00209, D00210, D00211, D00212, D00214, D00215, D00216, D00217, D00219, D00218, D00220, D00221, D00222, D00223, D00224, D00226, D00236, D00237, D00238, D00240, D00241, D00242, D00243, D00245, D00246, D00247, D00249, D00250, D00251, D00252, D00253, D00254, D00255, D00256, D00257, D00258, D00259, D00260, D00261, D00262, D00263, D00264, D00265, D00266, D00267, D00268, D00269, D00270, D00271, D00273, D00274, D00276, D00277, D00278, D00279, D00280, D00285, D00286, D00287, D00289, D00290, D00291, D00292, D00293, D00294, D00295, D00296, D00297, D00298, D00299, D00300, D00301, D00302, D00303, D00304, D00306, D00307, D00308, D00309, D00310, D00311, D00312, D00313, D00315, D00316, D00317, D00326, D00329, D00339, D00340, D00342, D00343, D00344, D00345, D00346, D00347, D00348, D00349, D00351, D00352, D00353, D00354, D00355, D00356, D00359, D00360, D00362, D00363, D00364, D00365, D00366, D00367, D00371, D00372, D00374, D00375, D00376, D00377, D00378, D00379, D00381, D00382, D00385, D00387, D00389, D00390, D00391, D00392, D00393, D00395, D00396, D00397, D00415, D00439, D00440, D00450, D00458, D00466, D00467, D00468, D00469, D00470, D00471, D00475, D00483, D00484, D00485, D00486, D00487, D00575, D00587, D00588, D00589, D00590, D00591, D00592, D00593, D00594, D00591, D00603, D00604, D00631, D00632, D00637, D00642, D00647, D00648, D00650, D00651, D00655, D00657, D00660, D00661, D00669, D00675, D00700, D00710, D00711, D00736, D00750, D00756, D00757, D00758, D00759, D00760, D00761, D00762, D00763, D00777, D00778, D00779, D00780, D00781, D00782, D00783, D00784, D00785, D00792, D00806, D00821, D00822, D00823, D00824, D00827, D00828, D00830, D00834, D00836, D00840, D00842, D00844, D00847, D00848, D00849, D00850, D00853, D00854, D00855, D00856, D00858, D00859, D00866, D00867, D00868, D00869, D00870, D00871, D00872, D00873, D00875, D00876, D00877, D00878, D00879, D00880, D00881, D00888, D00889, D00891, D00892, D00893, D00894, D00896, D00898, D00899, D00901, D00902, D00903, D00904, D00905, D00906, D00907, D00917

(Please see appendices for map based changes).

### **Summary of Issues Raised**

#### **Rezoning from/to Residential (RS/RA)**

A number of submissions request the rezoning of land from/to residential development. These are as follows:

- RS to OS adjoining Lambay View, Clifflands, Rush.
- RU to RS at Haystown, east of proposed relief road, no map attached.
- RU to RS at South Shore as the site is not considered to be suitable for horticultural or market gardening activities.
- RB to RS at Murrays Lane to build a one-off house for local needs. (038)
- RB to RS at Murray's Lane to build a one-off house for local needs. (130)

# PART TWO

---

## **Rezoning/Local Objectives for One-off Houses**

A submission seeks the provision of a dwelling on GE zoned lands at Whitestown Road, Rush for a family member.

## **Local Objectives/Specific Objectives**

A significant number of submissions seek the reinstatement of Local Objective 217 in relation to Rogerstown Estuary. This objective states: 'Examine the feasibility of developing a marina and auxiliary and associated facilities at the Ramparts, Rogerstown, Rush designed and built in accordance with sustainable ecological standards and avoiding significant adverse impacts on Natura 2000 sites and species protected by law. The potential for such developments to result in direct and indirect negative impacts on Natura 2000 Sites will be subject to screening for assessment under the Habitats Directive.'

A submission refers to the Map-based local objective No. 141 on the current development plan and requests its reinstatement to: 'Facilitate Agri-Tourism' at Tyrellstown Little, Lusk.

## **Transport**

A submission requests a number of improvements to pedestrian and cycle routes within Rush these include Convent Lane- Bawn Road, at South Beach Carpark and Channel Road, Balleally; a second submission seeks improvements to pedestrian safety street lighting along the Spout Road to Channel Road with traffic calming measures. A submission refers to the proposed western Relief Road, Rush. The submission recommends that if the road is to proceed it should be relocated to the east so as not to impact on existing residents in the area.

## **Community**

A submission raises serious concerns regarding the relocation of St Joseph's school to Kenure and requests that this does not occur.

A submission considers that the objective for a school site at Goldenridge site is surplus to requirement as the number of school places required for the town of Rush is provided for. The cost of procuring a school site that is zoned for housing development is also raised.

## **Industrial zoned lands**

A submission requests the relocation of GE zone from Whitestown Road to Hayestown. It is considered that the current location of the GE lands at you enter the town detracts from the beauty of Rush.

## **Local Area Plans/Masterplans**

A number of submissions were made objecting to the proposed Kilbush Lane Masterplan MP 6.D under Objective RUSH 21. Concerns were raised in relation to future plans for family members to build on family land. Another submission seeks the extension of the Masterplan with a resultant change in the town development boundary and a rezoning from HA to RS. In relation to the proposed masterplan it is felt that the objective of having houses facing north is unnecessary. Consultation in relation to the proposed linear park is also sought.

It is recommended that in the interest of removing any impediment to Phase 3 of the Goldenridge development, that objective MP.6.E be removed from sheet 6 of the Draft Fingal Development Plan 2017 – 2023 in the interest of fulfilling the overall objective of the Skerries Road Rush LAP. Alternatively, if the masterplan objective is to remain, in the interest of facilitating the development of the masterplan lands, the planning authority must permit

# PART TWO

---

development on a phased basis. This would remove any obstacle to developing the MP.6.E lands for development.

A general submission relates to Kenure LAP and sets out a number of comments in relation to Kenure LAP and Rush in terms of consultation on the LAP, better facilities and services, housing, green infrastructure, cultural heritage, roads, public transport, sewage, schools and tourism. In relation to Kenure LAP, concerns are set out in relation to sewerage, roads, cycleways, footpaths, residential areas and sports facilities. It is set out that housing should be provided with appropriate facilities, green infrastructure, better quality low density units and restricted to 2 storeys. The need for additional facilities is set out in line with proposals to regain blue flag status, develop coastal walkways, and develop state of the art health centre. Support for economic development is sought as is a request to reinstate Objective 8 (retail) of previous plan. Green infrastructure/cultural heritage are highlighted alongside the need to preserve the unique horticultural heritage of the area. The need for urban realm improvement is highlighted and it is stated that any development in the area of the church, new library, Theatre and the Milbank should be in keeping with the cultural heritage character of the town. It is requested that an objective to support feeder buses to/from the train station be included and support for a new secondary school is stated however a revised location is suggested.

## **Open Space/Recreational routes**

A submission relates to the coastal walk from north beach Rush to Loughshinny.

## **General Issues**

A general submission was made by Rush Community Development Committee in conjunction with Rush Community Council in relation to roads, housing, facilities, tourism, appearance of the town, public transport, culture and identity and maintenance of existing development plan local objectives.

## **Chief Executive's Response**

### **Rezoning from/to Residential**

The Fingal Settlement strategy embraces the strategic approach advocated by the Regional Planning Guidelines to physically consolidate the majority of future growth into the strong and dynamic urban centres of the metropolitan area while directing development in the hinterland to towns and villages in order to discourage dispersed development and unsustainable travel patterns. Rush was identified as a Moderate Sustainable Growth Town in the Fingal Settlement Strategy 2011-2017. It is considered that there is a sufficient quantum of land zoned for residential purposes in Rush and surrounding towns to cater for the plan period and beyond.

The quantum and location of zoned land in the County is directly influenced by the Development Plan's Settlement and Core Strategy. The Core Strategy identifies the quantum and location of development for the plan period that is consistent with the regionally defined population targets and settlement hierarchy, and, which reflects the availability of existing services, planned investment, sequential development and environmental requirements. The Core Strategy sets out the specific population targets and housing requirements across the County and the elements of the settlement hierarchy thereby act as a clear framework for amendments to existing zonings. The Core Strategy must demonstrate that the development objectives in the Development Plan are consistent with the National Spatial Strategy and Regional Planning Guidelines.

It is clear, based on the evidence-based approach adopted in the Core Strategy, that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development

# PART TWO

Plan period. There are areas of undeveloped RS land within the Rush development boundary. To allow the RS zoning at these locations would deliberately erode the rural character of this area and would result in deficiencies in terms of the provisions of basic infrastructure and public services, in addition to unsustainable travel patterns and a poor quality urban environment.

The submission requesting the rezoning of land from 'RS' to 'OS' adjoining Lambay View, Clifflands, Rush is sought to reflect that the area is used as open space. It seeks to adjust sheets 6, 15 and 16 to show lands as OS. There is a lengthy planning history to this site. It is considered that the RS zoning should remain on these lands.

The South Shore area of Rush consists mainly of small landholdings with a mixture of market gardening and single and cluster housing. It is an area, which in parts, is vulnerable to coastal erosion and planning in this area needs to take account of the need to protect Rogerstown Estuary SAC and SPA. The pattern of development is essentially residential, with some significant vacant sites and some retained horticultural activities. Recognising the established mix of horticulture and residential land use within this area, and the availability of water services infrastructure, the settlement strategy for housing in the open countryside will be more flexible within the area demarcated on the Development Plan maps. This area is located to the south and east of the R128 from the junction with Spout Road, immediately to the west of Rush. The settlement strategy for this area is set out in Chapter 5: Rural Fingal of the Plan. Any applications for development within the South Shore area should be considered as part of the Development Management process and having regard to relevant policies and objectives set out in Chapter 5 of the Draft Plan, and elsewhere as appropriate.

## Local Objectives/Specific Objectives

Local Objective 217 on the current Development Plan 2011-2017 has been incorporated into Objective RUSH 13 in Chapter 4, and states: 'Examine the feasibility of developing a marina and auxiliary and associated facilities at the Ramparts, Rogerstown, Rush designed and built in accordance with sustainable ecological standards and avoiding significant adverse impacts on European Sites and species. Such consideration shall take cognisance of a wider study into marina development along the Fingal coastline (Objective ED78, Chapter 6: Economic Development refers).

Objective ED78 states: 'Undertake a feasibility study of the Fingal coastline to identify potential sites to accommodate marina development relevant to recreational pursuits and requirements. As part of the study the impact on the receiving marine environment, including the coastline, will be assessed and Screening for Appropriate Assessment undertaken.' Both Objective RUSH 13 and Objective ED78 are considered to comprehensively address the content of the submissions received, and no change is recommended to the Draft Development Plan in this regard.

Local Objective 141 on the current Development Plan 2011-2017 states: 'Facilitate Agri Tourism.' It is noted that the subject lands contain the zoning objective RU Rural, under this zoning objective Agri Tourism is a permitted in principle use. As such, the insertion of Local Objective 141 to 'Facilitate Agri Tourism' on the subject lands is not considered necessary.

## Transport

Proposals for improved connectivity and permeability through a network of convenient and safe walking and cycling routes including pedestrian zones will be examined within the context of the various Local Area Plans, Masterplans, Urban Framework Plans and Public Realm Plans proposed in the Draft Plan for these areas. The Development Management Process and Capital Works Programme will also facilitate the development of pedestrian and cycling infrastructure. It is an

# PART TWO

---

objective of the Draft Development Plan under Objective MT28 and Table 7.1, to implement road improvement schemes including the Rush Relief Road and will be subject to detailed engineering design and public consultation.

## **Community**

The contents of the submission are acknowledged however it should be noted that a policy has not been included under the Draft Plan in relation to the relocation of St. Josephs School to Kenure.

The submission relating to a school site at Goldenridge is acknowledged. It is noted that the provision of new schools is primarily the responsibility of the Department of Education and Skills. In this regard the Department is guided by the Code of Practice on the Provision of Schools and the Planning System (2008). The Code of Practice sets out co-ordinated actions to be taken by Planning Authorities and the Department in planning for the provision of school sites within the planning system. If further sites are considered necessary in the future, the Council will work with the Department of Education and Skills and other bodies to ensure the development of schools at the optimum locations. In relation to MP 6.E the school symbol should remain at this location, until such time as an alternative site is found to accommodate schools in Rush.

## **Industrial zoned lands**

The GE zoned lands in Rush reflect the existing employment uses and good accessibility at this location. Under Chapter 6 there is an objective relating to GE zoned lands as follows: Objective ED89: 'Encourage high quality sustainable design, permeability and pedestrian and/or cyclist friendly environments within General Employment zoned lands.' To facilitate the co-ordinated development and examine the development potential of these lands in the context of the zoning objective, a Masterplan is proposed. This Masterplan will examine, among other elements, the western approach to Rush in the context of achieving a high quality of design.

## **Local Area Plans/Masterplans**

The contents of the submission are acknowledged in relation to Masterplan MP 6.D. Having regard to the extent of recent development at Kilburn Lane which has resulted in remaining lands being of an infill nature, it is considered that the removal of the above master plan from the current Plan is appropriate. The future development of lands in the area are best considered as part of the Development Management process in accordance with the Planning and Development Act 2000 (as amended) and the Planning and Development Regulations 2001 (as amended) having regard to relevant zoning and policy provision associated with individual sites.

The merits of the submission are acknowledged in relation to Masterplan MP 6.E (Kenure South Masterplan) however, the provision of a Masterplan at this location is considered necessary to facilitate a co-ordinated, high quality development which provides a relationship with open space and the proposed linear park. The consideration of piecemeal development at this location would be considered contrary to the proper planning and sustainable development of the area. It should be noted that submission of an overall concept/Masterplan for the area may be considered as part of any future planning application for development on the subject lands.

The detailed contents of the submission is acknowledged and welcomed. The Draft Plan includes provision for the preparation of Kenure Local Area Plan, Kenure South Masterplan and Kilbush Lane Masterplan which are considered the appropriate mechanisms for the consideration of the specific proposals as set out under the submission. The allocation of projected population growth for the County is set out to be reflective of the settlements position in the County Settlement Hierarchy. Specific densities and locations of this development are then guided by

# PART TWO

way of LAP/Masterplans relevant to the individual areas in line with infrastructural requirements. The identified site for a school has been carried out in line with Department of Education as part of a consultation process and the delivery of same will be subject to the requirements of a planning permission including the opportunity for public comment. The support of policies contained in the Draft Plan are welcomed and it is considered that Objective Rush 1 to Objective Rush 21 are sufficiently robust to facilitate the development of Rush as a vibrant town whilst maintaining its market gardening tradition. Additional policy is however recommended in relation to retail provision (previous Objective 8), and is set out in Chapter 4. Support for a shuttle bus in the town has already been provided for under the Draft Plan.

## **Open Space/Recreational Amenities**

The provision of accessible open space is an integral part of the provision of high-quality green infrastructure for communities and forms a core element in the Green Infrastructure Strategy for the County. In addition, there are a number of objectives throughout the Draft Development Plan which seek to promote and facilitate improved pedestrian and cycle networks and the recreational trails network throughout the County. These include Objectives ED61, and ED63-67. A long-standing objective of the Fingal Development Plan is the development of the 'Fingal Coastal Way' a strategic greenway for pedestrians and cyclists along the coastal corridor from Howth to Balbriggan. An audit of existing trails including 'rights of way' will form part of the planning and development of the strategic greenway of the 'Fingal Coastal Way'. The Recreational Trails Plan will include a public consultation process where relevant stakeholders and interested parties will have an opportunity to make submissions. Any parties interested in walking and cycling trail development in the County will have an opportunity to make submissions in this regard and will be considered in the context of the Recreational Trails Plan.

## **General Issues**

The detailed contents of the submission are acknowledged and welcomed. In support of the submission it should be noted that objectives 5 and 10 from the previous Plan have been retained as part of the Draft Plan and the Draft Plan includes provision for the preparation of Kenure Local Area Plan, Kenure South Masterplan and Kilbush Lane Masterplan which are considered the appropriate mechanisms for the consideration of the remaining specific proposals as set out under the submission including the identification of specific lands for parking. The allocation of projected population growth for the County is set out to be reflective of the settlements position in the County Settlement Hierarchy. Specific densities and locations of this development are then guided by way of LAP/Masterplans relevant to the individual areas in line with infrastructural requirements. The support of policies contained in the Draft Plan are welcomed and it is considered that Objective Rush 1 to Objective Rush 21 are sufficiently robust to facilitate the development of Rush as a vibrant town whilst maintaining its market gardening tradition.

## **Recommendations**

### **CE SH 6b.1:**

Remove Kilbush Masterplan MP 6.D from Sheet 6.B.

### **CE SH 6b.2:**

Prepare a Masterplan for GE zoned lands to the west of Rush, and amend Objective RUSH 21 accordingly.

# PART TWO

---

## Sheet 7: Donabate-Portrane

### Submissions Received Relevant To This Sheet

D00068, D00070, D00163, D00185, D00194, D00197, D00198, D00464, D00499, D00541, D00547, D00550, D00570, D00571, D00573, D00580, D00617, D00619, D00626, D00633, D00666, D00675, D00679, D00680, D00681, D00685, D00686, D00704, D00706, D00719, D00724, D00733, D00793, D00924, D00930.

(Please see appendices for map based changes).

### Summary of Issues

#### Rezoning to Residential (RS or RA)

The majority of submissions received on Sheet 7 seek a change in the zoning of land to residential on lands at The Burrow, Portrane, Corballis, Balcarrick, Hearse Road and Beaverstown for single and multiple housing proposals.

The majority of submissions seek a RS or RA zoning, in place of High Amenity, Greenbelt, Rural and Open Space zoning.

#### Rezoning to Rural Cluster

Other submissions received seek the extension of the existing Rural Cluster designation at Balcarrick and seek to designate new Rural Clusters at Balcarrick, Donabate and at Middlefield and the Burrow, Portrane.

#### Commercial

A number of submissions were received regarding lands at Lissenhall, Blake's Cross and Staffordstown Business Park and Hearse Road, which seek the rezoning of lands to LC (Local Centre), HT (High Technology), GE (General Employment) and RB (Rural Business).

#### Community Infrastructure

One submission seeks the rezoning of Church lands on Main Street, Donabate from Objective CI to town centre zoning (Objective TC). Another submission seeks the rezoning of lands adjacent to St Patrick's National Schools on the Portrane Road from High Amenity (HA) to Community Infrastructure (CI) and Residential (RS). The submission received from the HSE requests that the lands at St Ita's be rezoned from Objective HA (High Amenity) to Objective CI (Community Infrastructure). Another submission requested that a school be located on the existing open space at Beverton Estate or alternatively within undeveloped lands north of Beresford Estate.

#### Walkways & Cycleways

A number of submissions received address walkways and cycleways throughout the area. A new looped walkway is suggested to include the Broadmeadow Estuary to link this route to Swords Castle Park. It is noted that footpaths are required along rural roads with the need for a new access to Newbridge Demesne highlighted. A continuous footpath is required along Turvey Avenue and a footpath and cyclepath is also noted as being required along Hearse Road. Another submission requested that the cliff walk between Portrane and Donabate should be reinstated. It was noted in another submission received that the cycle route at Beaverstown Golf Club should be amended at the railway line.

# PART TWO

---

## Turvey Demesne

One submission requested the preparation of an integrated Masterplan at Turvey Demesne, to guide its future development and requested that the Demesne be included in the list of Integrated Tourism Complexes in the Draft Plan.

## Map Based Local Objectives

A number of new objectives were proposed, including the following:

- To provide for a nursing home / residential care centre at Blake's Cross, Corduff.
- To prepare and implement a Masterplan for lands at Turvey Demesne to provide for future integrated tourism, leisure and recreation use of the land.
- To provide for a specialist facility catering for persons with profound learning and mental difficulties at the Burrow, Portrane.
- Insert new Local Objective to provide for a Hearse Road 'Gateway Space' linking Donabate Village to Newbridge Demesne.
- To reinstate Local Objective 231 at Beach Lane, The Burrow.

## **Chief Executive's Response**

### Rezoning of Lands to Residential Development

A number of submissions requested the rezoning of lands which are currently zoned 'HA', 'GB', 'RU' and 'OS' to residential land use zonings (Objective 'RA' or 'RS') to accommodate single or multiple housing proposals. These lands are located at The Burrow, Portrane, Corballis, Balcarrick, Hearse Road and Beaverstown.

The *Ministerial Planning Guidelines on Development Plans*, issued under Section 28 of the *Planning and Development Act 2000*, state that 'zoning that is not responsive to or justifiable by reference to reasonable needs, or that substantially exceeds such needs, is not consistent with proper planning and sustainable development.' The Guidelines also make clear that in order to support public confidence in the planning system and the Development Plan process, decisions to zone land must be clearly justified on the basis of established need and must support the aims and strategy of the plan taking the following specific matters into account:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage policy, including conservation of habitats and other sensitive areas.

These rezoning submissions seek to allow residential development on lands located within strategic Greenbelt areas, rural and sensitive High Amenity lands and they cannot be justified based on the specific issues outlined above, whilst significant residential zoned lands (Objective 'RA', 'RS', 'RC' and 'RV') remain undeveloped.

Such a development pattern would result in deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and a poor quality, fragmented rural environment and the erosion of Greenbelt and High Amenity areas.

The Rural Settlement Strategy as set out in the Draft Plan reflects the existing policy in the current FDP 2011-2017. The policy recognises the need to provide for housing for the rural

# PART TWO

---

community but limits the amount of housing in the countryside and provides for alternative options within the rural area either in the villages or rural clusters as a more sustainable and suitable location for rural generated housing. The quantum and location of zoned land in the County is directly influenced by the Development Plan's Settlement and Core Strategy. The *Planning and Development (Amendment) Act 2010* introduced the requirement for an evidence based 'Core Strategy' to be provided in Development Plans. The Core Strategy identifies the quantum and location of development for the plan period that is consistent with the regionally defined population targets and settlement hierarchy, and, which reflects the availability of existing services, planned investment, sequential development and environmental requirements. The Core Strategy sets out the specific population targets and housing requirements across the County and the elements of the settlement hierarchy thereby act as a clear framework for amendments to existing zonings. The Core Strategy must demonstrate that the development objectives in the Development Plan are consistent with the National Spatial Strategy and Regional Planning Guidelines. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period.

Allowing certain individuals to be excluded from this policy would contradict this overall approach and be contrary to the proper planning and sustainable development of the area. Furthermore, there is a significant area of 'RA' zoned lands (approximately 138 hectares) included within Donabate LAP (March 2016), which has the potential to provide an additional 4,000 housing units on the Peninsula. There is therefore no justifiable need to rezone any additional greenbelt, high amenity or rural lands to provide for additional housing in this area.

Furthermore, the majority of the submissions received relate to the rezoning of high amenity lands. This is clearly not appropriate as such a change in designation would result in the erosion of the high amenity value of these lands. The HA lands generally adjoin the estuary and coast and the loss of same would contribute to a significant diminution of the area's landscape value. In conclusion, the rezoning of additional lands currently zoned 'HA', 'RU' and 'GB' would facilitate the uncoordinated, ad-hoc provision of unsustainable urban generated housing detached from existing designated settlements for which there is no evidence-based need or planning rationale and would result in an amended Core Strategy that would be contrary to the *National Spatial Strategy* and *Regional Planning Guidelines* and is, therefore, contrary to proper planning and sustainable development of the County.

## Rural Cluster Zoning

There are currently thirty four existing Rural Clusters within the Draft Plan to cater for rural generated housing need. These Rural Clusters have a strong residential focus and are based on a small number of individual houses and typically take the form of between 5 and 15 dwellings. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small clusters. For the most part, they will provide an opportunity for family members of existing households within the cluster to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

A large number of submissions were received seeking to rezone RU/RB/GB/HA lands to RC across the County. The majority of these proposals are new RC's with the remainder proposing extensions to existing RC's across the County. The Council considers there is no merit in rezoning new RC's or large scale extensions to existing RC's within the County based on the rationale set out in this CE Report.

## PART TWO

---

A proposed extension of c.0.2 ha's. [0.49 acres] is proposed to the south of the existing Balcarrick RC, located to the east of Donabate Village. Middlefield-Portrane, a proposed new RC of c. 2.6ha's. [6.4 acres] is located between Portrane Village to the east and Donabate Village to the west. Balcarrick-Corballis, a proposed new RC of c. 8 ha's. [19.7 acres] is located to the east of Donabate Village. These lands are all currently zoned high amenity and are not serviced by public mains drainage. The RU lands at the Burrow, Portrane which equates to 18.6 ha's. [21.2 acres] are proposed as a new RC.

There is sufficient land in the County zoned RC and there are existing Rural Clusters designated on the Peninsula. As such, there is no planning rationale for the creation of new Rural Cluster designations in the Burrow, Balcarrick-Corballis or Middlefield-Portrane or to extend the existing Rural Cluster designation at Balcarrick.

These proposed new Rural Clusters are located close to the large area of undeveloped 'RA' zoned lands (included within Donabate LAP) which have the potential to provide an additional 4,000 units in the Peninsula area. Furthermore, there are existing rural clusters in Balcarrick, Donabate and The Quay in Portrane, which have capacity to cater for additional dwelling units.

The change in zoning of these lands at Balcarrick, Middlefield and the Burrow as designated new rural clusters would represent piecemeal uncoordinated zoning of lands for which there is no evidence based need. The Ministerial Planning Guidelines on Development Plans, issued under Section 28 of the *Planning and Development Act 2000*, state '*zoning that is not responsive to or justifiable by reference to reasonable needs, or that substantially exceeds such needs, is not consistent with proper planning and sustainable development.*' The Guidelines also make clear that in order to support public confidence in the planning system and the development plan, decisions to zone land must be clearly justified on the basis of established need and must support the aims and strategy of the plan taking the following specific matters into account:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage policy, including conservation of habitats and other sensitive areas.

The zoning of these lands cannot be justified on the matters outlined above. These submissions seek residential development beyond the outer edge of the existing RC zoned areas and the creation of new rural clusters, while considerable development opportunities currently exist within the existing rural villages and rural clusters across the County. Such a development pattern would result in deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and the loss of agricultural and high amenity lands.

The allocation of housing unit numbers for the entire County area has been thoroughly analysed and addressed in the context of the Core Strategy of the Draft Plan 2017-2023 based on the directions contained in the RPG's. The quantum and location of zoned land in the County is directly influenced by the Development Plan's Settlement and Core Strategy. The *Planning and Development (Amendment) Act 2010* introduced the requirement for an evidence based 'Core Strategy' to be provided in Development Plans. The Core Strategy identifies the quantum and location of development for the plan period that is consistent with the regionally defined

# PART TWO

---

population targets and settlement hierarchy, and, which reflects the availability of existing services, planned investment, sequential development and environmental requirements. The Core Strategy sets out the specific population targets and housing requirements across the County and the elements of the settlement hierarchy thereby act as a clear framework for amendments to existing zonings. The Core Strategy must demonstrate that the development objectives in the Development Plan are consistent with the National Spatial Strategy and Regional Planning Guidelines.

Government policy as articulated by the National Spatial Strategy and the *Sustainable Rural Housing: Guidelines for Planning Authorities, April 2005*, classifies the rural area of Fingal as “an area under strong urban influence” where the housing requirements of the rural community should be facilitated but urban generated housing should be directed to areas zoned for residential development in cities, towns and villages. The approach is reflected in the Regional Planning Guidelines for the Greater Dublin Area. The inclusion in the Draft Plan of objectives facilitating the provision of additional housing without due regard to the Core Strategy and its approach is contrary to the national and regional direction.

Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period. The submissions received primarily relate to the rezoning of high amenity lands on the Donabate Peninsula. This is clearly not appropriate as such a change in designation would result in the erosion of the high amenity value of these lands. The HA lands generally adjoin the estuary and coast and the loss of same would contribute to a significant diminution of the area’s landscape value.

In conclusion, the rezoning of these lands would facilitate the uncoordinated, ad hoc provision of unsustainable urban generated housing detached from existing designated settlements for which there is no evidence-based need or planning rationale and would result in an amended Core Strategy that would be contrary to the *National Spatial Strategy* and *Regional Planning Guidelines* and is, therefore, contrary to proper planning and sustainable development of the County.

## Commercial

A number of submissions requested the rezoning of lands at Lissenhall, Staffordstown Business Park and Blake’s Cross. The submissions request that lands at Lissenhall be rezoned from Objective ‘GB’ to Objective ‘HT’, as these lands lie adjacent to the proposed Metro North route and adjoin other ‘HT’ zoned lands.

Submissions received in relation to Staffordstown Business Park request that lands be rezoned from Objective ‘GE’ (General Employment) to Objective ‘LC’ (Local Centre). Another submission requested that lands at Staffordstown be rezoned from Objective ‘RU’ to Objective ‘GE’ to be included within the Business Park area.

Other submissions requested that lands at Blake’s Cross in Lusk be rezoned from Objective ‘RU’ to Objective ‘GE’ (General Employment) and Objective ‘RB’ (Rural Business) and ‘RB’ to ‘GE’ and that lands at Hearse Road in Donabate be rezoned from Objective ‘HA’ to ‘GE’.

Significant land has been provided for in the Draft Plan for industrial, rural business and commercial land uses. There is no identified need to provide additional lands. Fingal’s Economic Strategy set out in the Draft Plan seeks to attract a range of employment types, across business and industry sectors at the most appropriate and accessible locations within the County,

## PART TWO

---

minimising the requirement for undue commuting and improving the quality of life for Fingal's residents. Strategic Policy 10 and Objectives ED02 and ED03 of the Draft Plan seek to promote enterprise and employment throughout the County, particularly in the growth Centres of Swords, Blanchardstown and Balbriggan.

In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach as advocated in the *DoECLG Development Plan Guidelines 2007* must be applied to the zoning of land for development. In this regard, areas to be zoned should be contiguous to existing zoned development lands, a strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands and zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided). Any future zonings shall have regard to this sequential approach.

There is a more than adequate quantum of employment zoned lands within the County to accommodate any future employment growth in readily accessible locations within the County where necessary infrastructure is at an optimum.

The quantum of existing GE zoned lands currently available for development is c.1218 hectares (3009 acres). These lands are located at highly accessible locations close to the motorway and national road network off the M50 and M1 corridors and at Damastown. The M50 corridor alone has an available and accessible landbank of c.399 ha's. [985 acres] of undeveloped GE zoned lands. The undeveloped landbank of GE and HT zoned lands at Courtlough equates to c. 57.6 ha's [142 acres]. These figures represent a substantial provision of GE zoned lands readily available for development.

Significant land has been provided for in the Draft Plan for rural business land uses. There is no identified need to provide additional lands. Fingal's Economic Strategy set out in the Draft Plan seeks to attract a range of employment types, across business and industry sectors at the most appropriate and accessible locations within the County, minimising the requirement for undue commuting and improving the quality of life for Fingal's residents. The Rural Business zoning at Blakes cross is considered to be the most appropriate zoning, given its location, and it is not recommended to rezone lands at this location from 'RB' to 'GE'. Strategic Policy 10 and Objectives ED02 and ED03 of the Draft Plan seek to promote enterprise and employment throughout the County, particularly in the growth Centres of Swords, Blanchardstown and Balbriggan.

The National Transport Authority, in their pre-draft submission, also state that the strategic transport function of the M1 should be maintained by limiting the extent of development which would give rise to the generation of local car-based traffic on the national road network. The M1 (&M50) are vital economic corridors for Dublin, and the east coast in general, and should not be used to facilitate development of employment which would be more appropriately developed in areas well served by existing or committed high quality public transport and/or within the key settlements of Swords, Blanchardstown or Balbriggan.

In the absence of the sequential approach, any coherent evidence based need or planning rationale for the proposed change in zoning in these rural locations, the proposal to change a substantial proportion of RU lands to 'RB', 'GE' and 'HT' would result in an un-coordinated, ad-hoc provision of unsustainable employment lands of which there no evidence based need.

## PART TWO

The rezoning of lands at Staffordstown Business Park to 'LC' (Local Centre) are considered inappropriate and would impact negatively on the viability of existing local centres in the area. The vision for 'LC' zoned areas is to: *Provide a mix of local community and commercial facilities for the existing and developing communities of the County. The aim is to ensure local centres contain a range of community, recreational and retail facilities, including medical/ dental surgeries and childcare facilities, at a scale to cater for both existing residential development and zoned undeveloped lands, as appropriate, at locations which minimise the need for use of the private car and encourage pedestrians, cyclists and the use of public transport. The development will strengthen local retail provision in accordance with the County Retail Strategy.*

Local Centres are usually small retail areas that serve a residential area within walking distance of these centres. Staffordstown Business Park does not fall within this category and retail, recreational and community facilities will be directed towards the designated town centre / village areas within Donabate and Portrane, as supported by policies and objectives within the Draft Plan.

The proposed commercial zonings would therefore be in breach of key objectives of the current FDP 2011-2017 and the emerging Draft FDP 2017-2023 and NTA policy to channel employment growth into the large urban centres of the County, aligned with existing and planned infrastructure and as such is contrary to proper planning and sustainable development.

### Turvey Demesne

One submission received requested that the lands at Turvey Demesne be designated for the preparation of an integrated Masterplan to guide their future development (to include the symbol MP 7.B). It is also requested that a new map based Local Objective be added which states: *To prepare and implement a Masterplan for lands at Turvey Demesne to provide for future integrated tourism, leisure and recreation use of the lands.'*

The Council will encourage the development of integrated tourism/leisure/recreational complexes in demesne type landscapes where such uses are consistent with the retention of such landscapes. The conservation of these assets into the future is essential and the Council recognises the need for the appropriate sustainable reuse of the buildings. Objective ED68 of the Draft Development Plan provides for the development of Integrated Tourism Complexes within demesne type settings. This objective seeks to: *'Facilitate, where appropriate, the conversion of former demesnes and estates and their outbuildings into integrated tourist, leisure and recreational complex type developments subject to architectural conservation best practice and proper planning and sustainable development.'*

Objective CH21 relates to the reuse, rehabilitation and retention of Protected Structures and states the following: *'Encourage the sympathetic and appropriate reuse, rehabilitation and retention of Protected Structures and their grounds including public access seeking that the Protected Structure is conserved to a high standard, and the special interest, character and setting of the building preserved. In certain cases the relaxation of site zoning restrictions may be considered in order to secure the preservation and conservation of the Protected Structure where the use proposed is compatible with the existing structure and this will only be permitted where the development is consistent with conservation policies and the proper planning and sustainable development of the area.'*

Turvey House is currently listed as a Protected Structure in the current Development Plan (RPS No.492). The review of the Record of Protected Structures is currently on public display until 29<sup>th</sup> July 2016. Turvey House was demolished in 1987 after it had fallen into disrepair. The site was

## PART TWO

---

developed as a golf course and clubhouse but there are still some fragmentary remains of Turvey House and its ancillary buildings. These remains are not considered structurally sufficient to warrant its retention on the Record of Protected Structures. Alternative protection for the site of the Medieval Tower House exists under the *National Monuments Act 1930-2004* as a Recorded Monument, RMP Ref. DU008-024001. As there are insufficient structural remains of Turvey House it is considered that its inclusion in the list of Integrated Tourism Complexes is not warranted.

It is however recommended that the lands be rezoned from Objective 'HA' (High Amenity) to Objective 'OS' (Open Space) to reflect the existing uses on site and the zoning of the lands to the south at Newbridge Demesne (which are also zoned Objective 'OS'). This zoning at Turvey Demesne will better reflect the existing and surrounding land use.

It is considered that the provisions of Objective ED68 could apply to any application on the subject lands, which facilitates, where appropriate, the conversion and redevelopment of former demesnes and estates. Any application for development on these lands will be assessed under the normal development management process, taking into account any relevant planning policies and objectives relevant to the site and surrounding area.

### Rezoning of lands to TC (Town and District Centre)

One submission requests the rezoning of the St Patrick's Church and Hall lands on Main Street, Donabate from Objective 'CI' (Community Infrastructure) to Objective 'TC' (Town and District Centre). There are two parcels of land included in this submission, one includes the Church building (east side of Main Street), and the other relates to the Church Hall, adjacent to the graveyard (west side of the Main Street). The Chief Executive agrees with the proposed rezoning of the lands from 'CI' to 'TC', which reflects the location of these sites within the town centre and the Council's policy of consolidation. It is therefore recommended that the lands be rezoned from 'CI' to 'TC'.

### Community Infrastructure

One submission seeks the rezoning of lands adjacent to St Patrick's National Schools on the Portrane Road from High Amenity (HA) to Community Infrastructure (CI) and Residential (RS).

There are ongoing traffic management issues relating to the drop off and collection of pupils at St Patrick's National Schools on the Portrane Road and the submission requesting the rezoning of adjacent lands to provide a set down area is to be welcomed.

It is recommended that the small area of 'HA' zoned lands (0.15ha) separating the 'CI' lands from the Portrane Road be zoned 'CI'. This will provide access to the existing CI zoned lands to the north and will enable the development of a suitable safe set down area adjacent to the school. It is recommended that a new map-based Local Objective also be attached to these lands to provide access for a school set down area.

The submission received from the HSE requests that the lands at St Ita's be rezoned from Objective HA (High Amenity) to Objective CI (Community Infrastructure). The 'HA' zoning at St. Ita's Demesne reflects the very special character and distinctiveness of this highly sensitive landscape- a uniquely special place in Fingal and the Greater Dublin Area. St. Ita's is built on an elevated coastal premonitory and is highly visible from great distances along the east coast. The existing buildings at St. Ita's (most of which are Protected Structures) together with the designed landscape (incorporating trees and woodlands) around the complex contribute to the special and distinctive character of these lands, the future retention and management of which is a key policy of FCC. St. Ita's is also a designated Architectural Conservation Area.

## PART TWO

---

A feasibility study of St Ita's, was completed in November 2013 jointly by Fingal County Council and the HSE to determine the optimal future sustainable use of this complex and to consider the development of new modern psychiatric health care and ancillary facilities having regard to the cultural, visual and ecological sensitivities of the site. The Feasibility Study identified the St Ita's Hospital complex and Demesne as a suitable location for the development of new modern psychiatric health care and ancillary facilities (which can include the provision of a National Forensic Mental Health Service Hospital). The Feasibility Study also prioritized the re-use of the existing hospital buildings (many of which are Protected Structures) together with their maintenance and management into the future the ongoing maintenance and management of existing trees and woodland and the maintenance and provision for an appropriate level of public accessibility through the site

Variation No. 3 – 'Lands at St. Ita's Portrane' was adopted by FCC on 10 March 2014. This variation comprised seven changes to the Fingal Development Plan 2011-2017, to facilitate the long term planning and sustainable development of the St Ita's Hospital complex and Demesne into the future by supporting the implementation of the objectives laid down in the completed Feasibility Study of St Ita's (Local Objective 245 Fingal County Development Plan 2011 – 2017), having particular regard to the conservation of the historic buildings within the designated ACA at St Ita's. The purpose of the Variation was also to give Development Plan certainty regarding the scope for appropriate re use of the historic structures at St. Ita's, including the accommodation of new modern health care and ancillary facilities within the historic hospital lands at St. Ita's. The changes adopted in Variation no. 3 are incorporated into the new Draft Plan.

There are a number of relevant policies and objectives included within the Draft Plan in relation to the development of St Ita's, in particular Objective CH22, which reads as:

### *Objective CH22*

*Promote the use or reuse of all the Protected Structures at St.Ita's Hospital complex and demesne in Portrane as a priority for Fingal County Council. Notwithstanding the use class 'HA' Zoning matrix , appropriate uses within the Protected Structures and within the ancillary land areas within the complex including uses which also relate to and are consistent with the historic use of the overall historic complex (established prior to the foundation of the Irish State)will be actively promoted and allowed to proceed subject to appropriate consent where such activities will secure viable sustainable re use of the complex into the future and which will provide for the proper conservation and sustainable development of St. Ita's.*

The 'HA' zoning at St. Ita's reflects the very special character and distinctiveness of this highly sensitive landscape- a uniquely special place in Fingal and the greater Dublin area which needs to be carefully protected and managed into the future . The 'HA' zoning is considered to be the appropriate zoning for these lands. The proposal to rezone a significant tract of land to 'CI' is considered to be contrary to the long term proper planning and sustainable development of these unique lands and there are adequate policies and objectives included within the Draft Plan to enable the redevelopment of St Ita's in the future.

Another submission received requested that a school be located on the existing open space at Beverton Estate or alternatively within undeveloped lands north of Beresford Estate. It is noted that the provision of new schools is primarily the responsibility of the Department of Education and Skills. In this regard the Department is guided by the *Code of Practice on the Provision of Schools and the Planning System (2008)*. The Code of Practice sets out co-ordinated actions to be

# PART TWO

taken by Planning Authorities and the Department in planning for the provision of school sites within the planning system.

Indicative school site icons are identified at strategic locations within the new development areas in Donabate, with the exact location, layout and detail to be finalised at planning application stage.

Objective DONABATE 3 and Objectives PM72 to PM77 of the *Draft Fingal Development Plan 2017-2023* commits the Council to reserve sites to facilitate the development of additional schools at both primary and secondary level in a timely manner in partnership with the Department of Education and Skills and/or other bodies. The Minister for Education and Skills is a statutory consultee for the purposes of the Fingal Development Plan and the Donabate Local Area Plan and has an active role in this regard. The Council continues to work pro-actively with the Department to ensure the issue of schools provision is properly addressed both through planning policy, to ensure that new schools are delivered in a timely and cost-effective manner in line with the proper planning and sustainable development of the areas in which they are needed.

The indicative locations chosen for new school sites within the Donabate LAP were selected to ensure that the new school sites will be located within the new residential communities and will also serve the existing residential community in Donabate, the majority of which is located east of the railway line. Furthermore, the school symbols are indicative only and do not preclude schools from being developed at other locations.

These locations correspond with the Department's request that site reservations are made, as close as possible to community facilities such as sports facilities, libraries, etc, so that these resources can be shared between the school and the community. This is also supported in Objective PM63 of the Draft Plan, which promotes the clustering of community, recreational and open space facilities, being located in local centres or combined with school facilities as appropriate.

It should be noted that if alternative sites are considered more suitable, become available or are required in the future, the Council will work with the Department of Education and Skills and other bodies to ensure the development of schools at the optimum locations.

## Map Based Local Objectives

A number of new objectives were proposed, including the following:

- To provide for a nursing home / residential care centre at Blake's Cross, Corduff.
- To prepare and implement a Masterplan for lands at Turvey Demesne to provide for future integrated tourism, leisure and recreation use of the land.
- To provide for a specialist facility catering for persons with profound learning and mental difficulties at the Burrow, Portrane.
- Insert new Local Objective to provide for a Hearse Road 'Gateway Space' linking Donabate Village to Newbridge Demesne.
- To reinstate Local Objective 231 at Beach Lane, The Burrow.

One submission requested the insertion of a map-based Local Objective at Blake's Cross to provide for a nursing home / residential care centre on lands currently zoned Objective 'RU' (rural). Another submission requested the insertion of a new Local Objective to provide for a

## PART TWO

---

specialist facility catering for persons with profound learning and mental difficulties at the Burrow in Portrane, on high amenity zoned lands.

The Council recognises that the provision of care for the elderly and other vulnerable people is an essential community requirement and there has been significant pressure for the development of such facilities in rural areas. There is a presumption against this type of development in the open countryside for reasons relating to sustainability, poor accessibility and lack of public transport, social exclusion and isolation.

The development of a nursing home / residential care centre at Blake's Cross would conflict with Objective DMS46 of the Draft Plan, which requires that *'residential care homes, retirement homes, nursing homes and retirement villages be located in towns and villages for reasons of sustainability, accessibility, social inclusion, and proximity to the availability of services, except where a demonstrated need to locate in a rural environment because of the nature of the care required can be clearly established.'*

The site is removed from any town / village and is located in a rural area. Planning permission was previously refused on the site for a retirement village under Reg Ref: F04A/1599. It is therefore not recommended that a map based Local Objective be included as it would contravene Council policy.

Likewise the development of a specialist facility for persons with profound learning and mental difficulties at the Burrow, Portrane is located on lands zoned High Amenity, which are not located adjacent to the existing Village or other supporting services. Furthermore, there is an existing planning permission on lands at St Ita's to provide a National Forensic Mental Health Services Hospital (Order No. PL06F. PA0037). There may be scope to develop additional services at this location given the requirement for the conservation and re-use of the existing buildings within this complex. It is considered inappropriate to attach a Local Objective for the development of such a facility on lands removed from Portrane Village and St Ita's Demesne in a sensitive high amenity area close to the coast.

It is not considered necessary to attach a new Local Objective to provide for a Hearse Road 'Gateway Space' linking Donabate Village to Newbridge Demesne. The Donabate LAP provides sufficient guidance in relation to the development of walkways and key linkages on the Peninsula and their indicative routes are included within the LAP and accompanying phasing maps. Any proposed 'Gateway Space' to link Donabate Village to Newbridge Demense can be dealt with as part of the development management process.

It is not considered appropriate to re-instate Local Objective 231 at Beach Lane, The Burrow, Portrane. This submission requested the rezoning of these lands from RU to RS with the inclusion of the objective to restrict the density at this location. Local Objective 231 has been updated by Local Objective 26 in the Draft Plan, which seeks to: *'Provide a maximum of 10 units per hectare, with a minimum site area of 1000 sq m and a maximum roof height of 6.65metres over the prevailing established ground level. All new houses to connect to mains drainage with no provision for on-site treatment systems.'*

The lands at The Burrow are unique in character and any development in this area must be sensitively designed and must respect the unique character, landscape and visual amenities of the area, taking account of the ecological sensitivity of qualifying features of nearby European Sites. It is not considered appropriate to zone these lands for residential development and the 'RU' zoning with the attached map based local objective currently allows for an appropriate level of small-scale residential infill at a relatively low density.

# PART TWO

---

Having regard to the existing development at the Burrow, it is considered appropriate to carry out a study to decide on the optimal future development of lands in this area, having regard to the local issues of coastal erosion, flooding, drainage and the significant landscape and biodiversity sensitivities in the area including a Flora Protection Order, Special Protection Area (SPA), Natural Heritage Area (NHA), Special Area of Conservation (SAC) and designated Ecological Buffer Zone.

It is recommended that a new objective to carry out this study is included within Chapter 4 of the written statement.

## Footpaths / Cycleways and Road Improvements

A number of submissions highlight the need for improved walkways and cycleways throughout the Peninsula. A new looped walkway is suggested to include the Broadmeadow Estuary and to link this route to Swords Castle Park. It is noted that footpaths are required along a number of rural roads with the need for a new access to Newbridge Demesne highlighted. A continuous footpath is required along Turvey Avenue and a footpath and cyclepath is also noted as being required along Hearse Road. Another submission requested that the cliff walk between Portrane and Donabate should be reinstated. It was also noted that the cycle route at Beaverstown Golf Club should be amended at the railway line.

Road junction improvements and footpath / cycleway provision are most appropriately dealt with through the Council's Capital Works Programme and through the Operations Department. Further information on roads is provided in the CE Response to Chapter 7 (Infrastructure and Movement).

A key feature of the development strategy of Donabate LAP is the delivery of approximately 30km of inter-connecting pedestrian and cycle routes on the Peninsula and these routes are detailed in Section 4 of the LAP. These routes will provide linkages throughout the Peninsula Lands, which will connect the LAP lands to the Village Centre, the Rail Station, existing residential areas and schools, Newbridge Demesne, Turvey Nature Reserve, St Ita's and the beaches at Donabate and Portrane.

It is an objective of the Local Area Plan to improve access to Newbridge Demesne and to implement the Turvey / Newbridge Loop – a pedestrian and cycle route which links Turvey Nature Reserve to Newbridge Demesne, the Broadmeadow Way and Donabate Village via the new and existing developments areas at Turvey and Corballis.

It is considered that the footpath improvements proposed along Turvey Avenue and the improved access arrangements to the Demesne from the Beverton / Beresford estate (i.e. opening the red door access point to the Demesne) will provide greater flexibility and ease of access. The Council is fully committed to the planning, development and implementation of these routes and their delivery is dependent on a multi-agency approach between landowners, environmental bodies and funding agencies with Fingal as the lead agency. The Council is currently progressing with the planning of various sections of these routes.

It is acknowledged that existing pedestrian infrastructure on Hearse Road is poor with very restricted potential for roadside footpaths. A new pedestrian / cycle bridge over the rail line is proposed to connect new development in the Corballis West area to the Village and Train Station. The Council is actively working towards resolving identified constraints in this area and, to this end, an Action Plan is currently in preparation, which will ensure that the necessary

# PART TWO

---

funding and resources are identified to deliver the critical pieces of infrastructure in this area. The Action Plan will include a full traffic assessment to examine the delivery of a pedestrian crossing from Newbridge Demensne to Beresford Estate / Turvey Avenue. Similarly, an Action Plan will be prepared for the provision of a footpath along Hearse Road identifying potential constraints and identifying the funding and resources required to deliver a footpath at this location.

It is considered that the process of identifying and seeking resource allocation for the upgrade and provision of footpaths and cycleways is more appropriately addressed through the established Area Committee procedure rather than in a strategic Development Plan document.

The Broadmeadow Way is a proposed pedestrian / cycle trail between Donabate and Malahide. It is a critical link in the Fingal Coastal Way route as it spans the Malahide Estuary, thereby linking the two peninsulas. The Council is currently progressing this project through the required statutory planning and environmental approvals process. The indicative route is illustrated on the relevant Sheets / Maps. All routes indicated on maps are indicative with scope for amending routes / including new looped routes to Swords Castle, etc, as required.

The cycle routes illustrated at Beaverstown Golf Club are indicative only and will be subject to public consultation at a more detailed design stage.

The cliff walk between Portrane and Donabate is included as part of the Fingal Coastal Way. This route is a long standing objective of the Fingal Development Plan and is a strategic greenway for pedestrians and cyclists along the coastal corridor from Howth to Balbriggan. An audit of these existing trails including 'rights of way' will form part of the planning and development of the strategic greenway of the 'Fingal Coastal Way' and the coastal path linking Donabate and Portrane is included in this audit. There are a number of relevant policies and objectives included within the Draft Plan to progress the Fingal Coastal Way, including Objective ED61, which seeks to: *'Promote and facilitate opportunities to create an integrated pedestrian and cycle network linking key tourist destinations in the County, by advancing the proposed Fingal Coastal Way, through carrying out a route evaluation study within two years of the adoption of this Plan, ensuring a balance is achieved between nature conservation and public use and through identifying public rights of way in consultation with all relevant stakeholders, and by exploiting former rail networks for use as potential new tourist and recreational walking routes.'*

A number of the road improvements required and highlighted in submissions received are included within Table 7.1 'Road Schemes' of the Draft Plan. It should be noted that the road alignments illustrated on Development Plan maps are indicative only and will be subject to public consultation at a more detailed design stage.

## **Recommendations:**

### **CE SH 7.1:**

Rezoned lands at Turvey Demesne from Objective 'HA' to Objective 'OS'.

### **CE SH 7.2:**

Rezoned St Patrick's Church lands (east side of Main Street) from Objective 'CI' to Objective 'TC'.

### **CE SH 7.3:**

Rezoned St Patrick's Church Hall (west side of the Main Street) from Objective 'CI' to Objective 'TC'.

# PART TWO

---

## **CE SH 7.4:**

Rezone lands to the south of the 'CI' zoning at St Patrick's National School fronting the Portrane Road, from 'HA' to 'CI' (0.15ha). Attach new map based Local Objective to read as: *'To provide pedestrian and vehicular access to a designated school set down area to serve St Patrick's National Schools'*.

## **CE SH 7.5:**

Insert new Objective PORTRANE XX within Chapter 4 of the written statement:

*Prepare a study to decide on the optimal future development of lands in the Burrow area, having regard to the local issues of coastal erosion, flooding, drainage and the significant landscape and biodiversity sensitivities in the area including a Flora Protection Order, Special Protection Area (SPA), Natural Heritage Area (NHA), Special Area of Conservation (SAC) and designated Ecological Buffer Zone.*

# PART TWO

## Sheet 8

## Swords

### Submissions Received Relevant to this Sheet

D00008, D00018, D00030, D00045, D00158, D00163, D00164, D00172, D00319, D00368, D00404, D00452, D00479, D00481, D00489, D00493, D00517, D00503, D00523, D00550, D00558, D00580, D00581, D00605, D00606, D00608, D00611, D00625, D00644, D00668, D00670, D00674, D00693, D00713, D00727, D00743, D00744,

(Please see appendices for map based changes).

### Summary of Issues:

#### Rural

One number submission requested a change from GB to RU.

#### Rural Cluster

2 no. submissions were received in relation to the rural cluster zoning. It is requested to rezone GB as RC.

#### Residential: (RS & RA)

A significant number of rezoning requests seek a change of zoning status to residential use on lands throughout Swords.

The majority of submissions seek a RS or RA zoning, in place of Green Belt, High Amenity, General Industry, Metro Economic Corridor, Open Space or Community Infrastructure zoning.

The rezoning requests are summarised as follows:

- It is proposed to zone lands at Feltrim Road from GB to RS and RA to reflect the existing use and to provide new residential development.
- It is requested that lands located north of north of Malahide Road (R106) and south of Estuary Road at Mountgorry/Seatown East are zoned a mix of RA and OS with a Masterplan objective from HA and GB.
- It is requested the development boundary of Swords is extended at the Rathbeale Road and lands are zoned from GB to RA with a Masterplan objective.
- This submission requests a change in zoning from GB to RA relating to lands at Brazil Farm, Swords. This submission also requests oral representations with FCC regarding the proposal.
- One submission requests a change in zoning from GB to RS for some 38 ha's. of lands located to the east of the Brackenstown Masterplan lands.
- Two submissions request that lands adjacent to Drinan and Waterside are rezoned from GB to RA and OS.
- It is requested a portion of land at Mooretown/Oldtown is rezone from GB to RA.
- At Holybanks, it is requested that land is zoned RA from ME and the Masterplan (Estuary West/Holybanks) boundary is amended to exclude the subject lands.
- At Ridgewood it is proposed to rezone OS to RS to reflect what's on the ground.
- At Nevinstown East it is proposed to rezone from GE to RS.
- A significant submission has been made in respect of Bovale lands at Barryspark. It is requested that text in relation to the Barrysparks Masterplan is amended and that HT lands are zoned RA or ME and the Barrysparks Masterplan boundary is extended to include these RA lands.

# PART TWO

---

## **Metro Economic Corridor**

3 no submissions were received requesting changes in zoning to Metro Economic Corridor:

- 2 adjoining submissions in Nevinstown request a change from RW to ME. An oral hearing into this is also requested.
- One submission seeks a change in zoning from HT to ME for lands at Lissenhall Great.

Lastly one submission acknowledges lands at Barrysparks have been zoned ME where they were previously MC and queries the implications for the Barryspark Local Area Plan.

## **Major Town Centre**

2 submissions request zoning changes to MC, major town centre:

- It is noted the internal private roads within Pavilions Shopping should be zoned Major Town Centre, whereas currently the zoning excludes same.
- Lands north of the Fosterstown Link Road should be rezoned from 'RA' to 'MC'. Seeks new objective to Sheet 8 to: 'Facilitate the accommodation of a major hotel / conferencing centre within parkland setting as a landmark development adjacent to and accessed from the Pinnock Hill Roundabout and the R132 public transport corridor.'

## **Local Centre**

One submission, from Tesco, seeks the entirety of their lands at Holywell be zoned LC.

## **Community Infrastructure**

One submission requests a rezoning from GE to CI at Glen Ellan from 'GE' to 'CI'.

## **Open Space:**

One submission raises concerns regarding particular lands zoned HA and OS at Swords Manor. Clarity is sought regarding the provision of a clubhouse at this location and requests a zoning change if necessary for these works.

## **Unclear Zoning Requests**

A number of zoning requests were made but were unclear in that no maps were submitted or the proposed zoning not stated. Requests were made as follows:

- The first part of Drynam Road should be Metro Economic Corridor.
- The land around Avondale considered for development in the Draft Plan.
- Rezone greenbelt to non greenbelt.

## **Walkways:**

A number of submissions received address walkways around Broadmeadow Way. A new looped walkway is suggested to include the Broadmeadow Estuary to link this route from Malahide to Swords Castle Park.

## **Map Based Local Objectives**

A number of submissions relating to existing and new objectives were submitted, including the following:

- Conserve the site of St. Cronan's Holy Well, Mooretown.
- Objective 41 should only be considered if at all, in conjunction with reopening the road between Highfield estate and River Valley estate as River Valley
- Local objective 354 of the current Development Plan should be reinstated and reworded as follows: 'Provide for the continued use of helicopter maintenance and heli-facilities and expansion of same, at a scale and intensity appropriate to the site's strategic location in close

# PART TWO

---

proximity to Dublin airport and having regard to the Irish Aviation Authority operational procedures and safety standards.'

## **Masterplans**

Two submissions have been received in relation to the Seatown Masterplan (MP8.D). It is requested that lands immediately east of the R132 are removed from the Seatown Masterplan boundary and it is proposed to separate the Masterplan area into two separate Masterplans - Seatown North Masterplan and Seatown South Masterplan.

## **Chief Executive's Response**

### **Rural**

One submission has been received requesting a change of zoning from GB to RU at Magilstown. The subject site at Magilstown forms part of the strategic greenbelt around Swords. The Swords Greenbelt is one of the most critical in the County safeguarding the innate rural value of the Fingal countryside from unsustainable settlement patterns. Any encroachment into this strategic Greenbelt area would result in coalescence and the loss of definition between urban and rural areas. The Council is fully committed to the continued protection of the Greenbelt and to allow for any additional housing in this area would seriously undermine the long standing Greenbelt policy of the Council and would be contrary to the zoning objective and vision to protect Greenbelt lands as set out in the Draft Plan and as such is contrary to proper planning and sustainable development of the area. The GB zoning is most appropriate and no changes are recommended.

### **Rural Cluster**

There are currently thirty four existing Rural Clusters within the Draft Plan to cater for rural generated housing need. These Rural Clusters have a strong residential focus and are based on a small number of individual houses and typically take the form of between 5 and 15 dwellings. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small clusters. For the most part, they will provide an opportunity for family members of existing households within the cluster to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

A large number of submissions seek to rezone RU/RB/GB/HA lands to RC at the following locations across the County; Adamstown, Ballymadun, Ballough-Lusk, Balcarrick-Donabate, Balcarrick-Corballis, Baskin Lane/Stockhole Junction, Blackhills, Burrow-Portrane, Brownstown-Swords, Colecott, Collinstown Lane, Corduff, Curragh West, Feltrim-Malahide, Greatcommons-Lusk, Grougha, Hedgestown, Kilsallaghan, Magillstown-Swords, Middlefield-Portrane, Newpark-The Ward and Wimbletown.

These are requests for two new RC's in the same general area, Magilstown. The overall area proposed to RC measures c. 12 ha's. [29.65 acres] and would yield c. 60 no. dwelling units as no public foul mains drainage in the area. The Council considers there is no merit in rezoning new RC's within the County based on the rationale set out in this CE Report.

The change in zoning of the subject lands as designated new Rural Clusters would represent a piecemeal uncoordinated rezoning of lands for which there is no evidence based need. The Ministerial Planning Guidelines on Development Plans, issued under Section 28 of the Planning and Development Act 2000, state "zoning that is not responsive to or justifiable by reference to reasonable needs, or that substantially exceeds such needs, is not consistent with proper planning and sustainable development." The Guidelines also make clear that in order to support

## PART TWO

---

public confidence in the planning system and the development plan, decisions to zone land must be clearly justified on the basis of established need and must support the aims and strategy of the plan taking the following specific matters into account:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage policy, including conservation of habitats and other sensitive areas.

The zoning of these lands cannot be justified on the matters outlined above. These submissions propose residential development beyond existing RC zoning, while RC zoned lands remain undeveloped and are sufficient in area to accommodate local rural based housing need across the County. The close-by existing designated rural cluster at Magilstown contains no public drainage but is sufficient in area to accommodate local rural based housing need. There is also significant provision also available within the adjoining rural villages at Ballyboughal, Oldtown and Rowlestown and the larger urban settlement of Swords. Such a development pattern would result in deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and the loss of agricultural and green belt lands.

The quantum and location of zoned land in the County is directly influenced by the Development Plan's Settlement and Core Strategy. The Planning and Development (Amendment) Act 2010 introduced the requirement for an evidence based 'Core Strategy' to be provided in Development Plans. The Core Strategy identifies the quantum and location of development for the plan period that is consistent with the regionally defined population targets and settlement hierarchy, and, which reflects the availability of existing services, planned investment, sequential development and environmental requirements. The Core Strategy sets out the specific population targets and housing requirements across the County and the elements of the settlement hierarchy thereby act as a clear framework for amendments to existing zonings. The Core Strategy must demonstrate that the development objectives in the Development Plan are consistent with the National Spatial Strategy and Regional Planning Guidelines.

Government policy as articulated by the National Spatial Strategy and the Sustainable Rural Housing: Guidelines for Planning Authorities of April 2005, classifies the rural area of Fingal as "an area under strong urban influence" where the housing requirements of the rural community should be facilitated but urban generated housing should be directed to areas zoned for residential development in cities, towns and villages. The approach is reflected in the Regional Planning Guidelines for the Greater Dublin Area. The inclusion in the Draft Plan of zoning objectives facilitating the provision of additional housing without due regard to the Core Strategy and its approach is contrary to the national and regional direction. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period.

The Swords Greenbelt is one of the most critical in the County safeguarding the innate rural value of the Fingal countryside from unsustainable settlement patterns. Any encroachment into this strategic Greenbelt area would result in coalescence and the loss of definition between urban and rural areas. The Council is fully committed to the continued protection of the Greenbelt and to allow for any additional housing in this area would seriously undermine the long standing Greenbelt policy of the Council and would be contrary to the zoning objective and

# PART TWO

vision to protect Greenbelt lands as set out in the Draft Plan and as such is contrary to proper planning and sustainable development of the area.

Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period. In conclusion, there is no evidence based need or planning rationale for the proposed zoning of new rural clusters which would be in breach of the Core Strategy of both the FDP 2011-2017, the Draft Plan 2017-2023 and the Regional Planning Guidelines 2010-2022 and as such would be contrary to proper planning and sustainable development.

## Residential

A significant number of submissions requested the rezoning of lands to residential land use zonings (RS or RA). The majority of these lands are currently zoned HA or GB. Within the existing development boundary of Swords a small number of submissions requested a rezoning to residential zonings from HT, ME and GE.

The *Ministerial Planning Guidelines on Development Plans*, issued under Section 28 of the *Planning and Development Act 2000*, state that 'zoning that is not responsive to or justifiable by reference to reasonable needs, or that substantially exceeds such needs, is not consistent with proper planning and sustainable development.' The Guidelines also make clear that in order to support public confidence in the planning system and the Development Plan process, decisions to zone land must be clearly justified on the basis of established need and must support the aims and strategy of the plan taking the following specific matters into account:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage policy, including conservation of habitats and other sensitive areas.

These rezoning submissions seek to allow residential development on lands located within strategic Greenbelt areas and sensitive High Amenity lands and they cannot be justified based on the specific issues outlined above, whilst significant residential zoned lands (Objective 'RA', 'RS', 'RC' and 'RV') remain undeveloped.

Such a development pattern would result in deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and a poor quality, fragmented rural environment and the erosion of Greenbelt and High Amenity areas.

The Rural Settlement Strategy as set out in the Draft Plan reflects the existing policy in the current FDP 2011-2017. The policy recognises the need to provide for housing for the rural community but limits the amount of housing in the open countryside and provides for alternative options within the rural area either in the villages or rural clusters as a more sustainable and suitable location for rural generated housing.

The quantum and location of zoned land in the County is directly influenced by the Development Plan's Settlement and Core Strategy. The Planning and Development (Amendment) Act 2010 introduced the requirement for an evidence based 'Core Strategy' to be provided in

## PART TWO

---

Development Plans. The Core Strategy identifies the quantum and location of development for the plan period that is consistent with the regionally defined population targets and settlement hierarchy, and, which reflects the availability of existing services, planned investment, sequential development and environmental requirements. The Core Strategy sets out the specific population targets and housing requirements across the County and the elements of the settlement hierarchy thereby act as a clear framework for amendments to existing zonings. The Core Strategy must demonstrate that the development objectives in the Development Plan are consistent with the National Spatial Strategy and Regional Planning Guidelines.

Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period.

The Greenbelt around Swords is one of the most critical in the County. Any encroachment into this strategic Greenbelt area would result in coalescence and the loss of definition between urban and rural areas. It is also not considered necessary or appropriate to rezone any of the greenbelt lands at Mountgorry/Seatown East and Drinan/Waterside to open space zoning.

Therefore, the rezoning of additional lands currently zoned 'HA' and 'GB' would facilitate the uncoordinated, ad-hoc provision of unsustainable urban generated housing detached from existing designated settlements for which there is no evidence-based need or planning rationale and would result in an amended Core Strategy that would be contrary to the *National Spatial Strategy* and *Regional Planning Guidelines* and is, therefore, contrary to proper planning and sustainable development of the County.

The request to zone ME lands located at Estuary West is considered acceptable. While residential development is permitted in principle within the ME zoning objective, it is considered RA is more appropriate at this location due to the site's location adjacent to the existing Applewood residential area and the Broad Meadow Riverside Park, together with its close proximity to the planned Metro North and the Bus Rapid Transit (BRT) route that travels along Glen Ellen Road. Residential development is the most appropriate and logical use for the subject site. The proposed inclusion of a specific objective for a 'Proposed School' on these lands indicates that these lands are favourably disposed to residential development.

The submission also requests that the Masterplan objective is excluded from these lands. On consideration of this request, it is considered appropriate that the Masterplan objective remains. This will guide new development and provide essential social and infrastructure in a phased and sustainable manner. However, it is considered appropriate that the Masterplan area Estuary West is divided in two at the Balheary Road, this will allow drafting of the Masterplan for the subject site in a more expedient manner. The Balheary Road is a natural boundary and the new Estuary West Masterplan will be located to the west and Estuary Central Masterplan to the east of this road.

The submission received in relation to lands at Barrysparks requests, inter alia, that HT lands are zoned RA or ME and the Barrysparks Masterplan boundary is extended to include these lands. The lands subject of this request measure approximately 9 hectares and extend from the ME zoned lands at Barrysparks in a southeasterly direction towards Holywell. The purpose of the High Technology zoning is to facilitate opportunities for major office, science and technology, and research and development based employment within high quality, highly accessible, campus style settings. The HT zoning is one of the most important economic development zonings in Fingal with just over 690 ha of HT zoned lands located principally in Blanchardstown and Swords, supplemented with significant zonings at Dublin Airport and along the southern boundary of the

# PART TWO

County with Dublin City. The subject lands are most appropriately zoned HT and no changes are recommended. However, on review of this area and the Crowcastle Masterplan, it is proposed to include new objectives within the Crowcastle Masterplan in Chapter 4 to emphasise the links to Barrysparks.

At Rathingle in Ridgewood it is requested to rezone OS lands to RS to reflect what's on the ground. Development has been carried out in this area over a number of phases with large areas of the development having been delivered as public open space and playing pitches. There remains a strip of undeveloped land between The Elms (Phase 8) and the adjoining pitches, which has an area of 0.58 ha/1.4 acres, and which is zoned for open space use, however, given the quantum open spaces delivered to date in Ridgewood, there is no requirement for any more open spaces to serve all of the existing and permitted dwellings within Ridgewood as a whole and any future houses that may be accommodated on the subject strip of land. The subject piece of land, if developed for housing, will be the final piece of land that requires permission for housing within Ridgewood. It can cater for 17 no. houses i.e. 5 no. 4 bed semi-detached houses and 12 no. 3 bed semi-detached houses, all of which are similar to the adjoining houses already delivered in The Elms. The development of these houses on the subject plot of land will also provide for passive surveillance of the adjoining playing pitches/open space hence reducing the possibility of anti-social behaviour as this area will be directly overlooked by housing. In terms of the proper planning and sustainable development of the area and in reflecting the high quality character of Ridgewood, the zoning of the subject piece of land will allow for the completion of Phase 8 and is considered reasonable.

The Council considers that there is merit in allowing for small scale incremental extension of the development boundary. Therefore, it is proposed to re-zone of a small section of land (1.66 ha's) to the west of the existing development boundary at Mooretown/Oldtown to rationalise and consolidate the existing RA boundary and to reflect the surrounding land uses.

## **Metro Economic Corridor**

The quantum of RW zoned land is one of the lowest compared to other employment generating zoned land within the county (See Table 6.3 of the Draft Plan). A substantial proportion of these 'RW' zoned lands are already developed or committed for development. Only limited amounts of zoned RW lands remain undeveloped to date. This includes the subject lands located at Airside in Swords. These lands are in close proximity to the M1 Motorway and R132, existing and planned public transport services and are an appropriate location for this type of development. The lands are located in a transitional location on the southern edge of the retail park, adjoining existing residential development and green belt lands and more importantly within an area of existing smaller scale retail warehousing units. It is not considered appropriate to rezone these lands.

Likewise the lands at Lissenhall, east of the R132, represent an opportunity for the development of HT lands. The purpose of the High Technology zoning is to facilitate opportunities for major office, science and technology, and research and development based employment within high quality, highly accessible, campus style settings. The HT zoning is one of the most important economic development zonings in Fingal with just over 690 ha of HT zoned lands located principally in Blanchardstown and Swords, supplemented with significant zonings at Dublin Airport and along the southern boundary of the County with Dublin City. The subject lands are most appropriately zoned HT and no changes are recommended.

Barryspark Local Area Plan was adopted in July 2011. As per Section 18 (4)(b) of the Planning and Development Acts, as amended, a local area plan may remain in force notwithstanding the making of a new development plan affecting the area to which the local area plan relates except

# PART TWO

---

that, where any provision of a local area plan conflicts with the provisions of the new development plan, the provision of the local area plan shall cease to have any effect. A new Masterplan is proposed for this area.

## **Major Town Centre**

The roads around the Pavilions shopping centre are internal and private and comprise part of the Phase 3 development of the centre, therefore it is considered appropriate they are zoned MC.

The zoning request at Fosterstown relates only to the northern portion of the lands at Fosterstown. It is considered appropriate to rezone these as it is a minor natural extension of the existing MC zoning. The lands will remain within the existing Masterplan boundary and it is recommended another objective is included within this Masterplan, (MP8G) in Chapter 4.

## **Local Centre**

Permission has been granted at the subject site, as per F12A/0046, ABP Ref. No. PL06F.241043. The mix of zonings does not preclude the development at this site. The proposed rezoning is not necessary at this location.

## **Community Infrastructure**

These lands are currently in use at part of St. Colmcille's GAA grounds. It is considered appropriate to be zoned as CI.

## **Open Space:**

The subject lands form part of Swords Manor football club and are mix of HA and OS zoned lands. Recreational clubs/sports facilities are permitted in principle within the OS zoning and open for consideration within the HA zoning. The provision of a club house is best dealt with through the Development Management process. No change in zoning is recommended.

## **Unclear Zoning Requests**

Notwithstanding the ambiguity of the requests, it is considered there is adequate land zoning within Swords to cater for all types of development and no further changes are recommended.

## **Walkways:**

A new looped walkway is suggested to include the Broadmeadow Estuary and to link this route to Swords Castle Park. The Broadmeadow Way is a proposed pedestrian / cycle trail between Donabate and Malahide. It is a critical link in the Fingal Coastal Way route as it spans the Malahide Estuary, thereby linking the two peninsulas. The Council is currently progressing this project through the required statutory planning and environmental approvals process. The indicative route is illustrated on the relevant Sheets / Maps. All routes indicated on maps are indicative with scope for amending routes / including new looped routes to Swords Castle, etc, as required. No changes are required at this point.

## **Map Based Local Objectives**

St Cronans Holy Well is protected under legislation, both as a Protected Structure no. 370 and a Recorded Monument, DU011 - 018, with each recorded in Appendices 2 & 3 respectively, that accompany the Draft Development plan. It is afforded protection under national legislation. Furthermore, the importance of St. Cronan's Holy Well is outlined in the Oldtown/Mooretown LAP.

# PART TWO

Objective 41 seeks to improve pedestrian and cycle facilities in this area. Reopening the link between Highfield Green and Hilltown would improve vehicular permeability. However, DMURS promotes filtered permeability (i.e. better permeability for pedestrians and bicycles than for motorized vehicles). Consequently, opening the link would be contrary to DMURS guidance and Council policy and no changes are recommended.

The provision of a development such as heli-facilities, this would be contrary to the underlying zoning objective, GB, and its vision. Therefore no changes are recommended.

## **Masterplans**

The subject lands are located along the R132 at the western section of the proposed Masterplan area and include an access into and from the Masterplan lands. To omit these land would be premature and may compromise the success of the entire Masterplan area.

The proposal to separate the Seatown Masterplan into two separate areas is acceptable. It is recommended two Masterplans are prepared, Seatown North and Seatown South. The existing distributor road through the area will be the boundary. New objectives will be prepared for each area.

## **Recommendation:**

### **Residential**

#### **CE SH 8.1:**

Rezone GB land, measuring 1.66ha at Mooretown/Oldtown to rationalise and consolidate the existing RA boundary.

#### **CE SH 8.2:**

Rezone land west of Newton House as RA

#### **CE SH 8.3:**

Create two new Masterplan areas where Estuary West is currently proposed. Lands to the east of Balheary Road will be known as Estuary Central and lands to the west as Estuary West.

#### **CE SH 8.4:**

Include the following text in Chapter 4 to describe these Masterplans.

### ***Estuary West***

- *Future development shall provide a strong urban edge with attractive elevations which address, overlook and provide a high degree of informal supervision of : the Glen Ellan distributor Road; the extended Broadmeadow Riverside Park and Jugback Lane*
- *A mixed use Local Services Area shall be provided in the centre of the subject lands close to Newtown House and the Stand of mature trees.*
- *Provide for an extension to the Broadmeadow Riverside Park between Jugback Lane and Balheary Road in conjunction with the first phase of the development of the MP lands.*
- *Reserve a School site as required in consultation with the Department of Education and Skills.*
- *Provide for pedestrian and cycle routes within the MP lands [in particular, along a west - east access linking the proposed Local Service Area in the MP lands with Applewood to the west; along the extended Broadmeadow Riverside Park and along Jugback Lane.*
- *Provide for the retention and protection of the mature stands of trees around Newtown House as part of the development.*
- *Provide for buildings to be set back in a landscaped setting from the edge of Jugback Lane.*
- *Protect the residential amenities of existing property adjoining the subject lands.*
- *Retain the rural character of Balheary road north of its junction with Glen Ellan Road .*

# PART TWO

- *The Master Plan lands will be subject to a detailed flood risk assessment to address potential flood risk and proposed mitigation measures.*
- *Consult with HSA in relation to the designated Svesco site to south as part of the MP process.*

## **Estuary Central**

- *Provide for the proposed new Metro North aligned through these lands and an appropriate relationship and integration of development to the proposed new Metro North at this location.*
- *Future development shall provide a strong urban edge with attractive elevations which address, overlook and provide a high degree of informal supervision of: the Balheary Road [southern section, south of junction with Glen Ellan Road]; the link road between Castlegrange and the Estuary roundabout; the extended Broad meadow Riverside Park to the north and the Ward River which crosses through the subject lands.*
- *Reserve a School site as required in consultation with the Department of Education and Skills.*
- *Provide for the retention and protection of existing mature trees and hedgerows within and bounding the MP lands in so far as is practicable.*
- *Provide for pedestrian and cycle routes within the MP lands [in particular, along a west - east axis linking the subject lands to any proposed new Metro North stop proposed along the R132 and to the adjoining Estuary West MP lands; and also along the extended Broadmeadow riverside park and along the Ward River valley].*
- *Protect the residential amenities of existing property within and adjoining the subject zoned lands.*
- *Retain the rural character of Balheary road north of its junction with Glen Ellan Road*
- *No development will be permitted on Balheary Park until these public open space lands are replaced by similar recreational facilities within the proposed regional Park on the west side of the Town*
- *The Master Plan lands will be subject to a detailed flood risk assessment to address potential flood risk and proposed mitigation measures.*
- *Develop the Ward River corridor as a 'Green Spine' through the subject lands connecting into the Broad meadow River Park.*
- *Retain existing stone walling along the R132.*
- *Consult with the HSA in relation to the designated Svesco site to south as part of the MP process.*

## **CE SH 8.5:**

Amend the text accompanying the Crowcastle Masterplan in Chapter 4 to include the following new points state:

- *Develop a detailed road design for Airside – Feltrim Link Road within the corridor and ensure delivery of this road in tandem with/prior to development of adjoining RS, RA and HT lands.*
- *A new road shall be constructed through the western section of the subject lands which shall in time connect the R132 to the proposed Airside – Drinan Link Road to the south.*
- *A new road shall be constructed through the eastern section of the subject lands which shall in time connect the R132 via the Drynam Road to the proposed Airside – Drinan Link Road to the south.*
- *Establish strong links between Barryspark and Holywell.*
- *Provide for a linear park incorporating a Strategic SuDs and Flood risk management corridor across the northern part of these lands.*
- *Provide for a linear park incorporating a Strategic Suds and Flood risk management corridor across these lands, immediately to the south of the Airside – Drinan Link Road and linking into the existing Public open space at Holywell.*

## **CE SH 8.6:**

Rezoned land (0.58 ha/1.4 acres) at Rathingle to RS

# PART TWO

## Major Town Centre

### CE SH 8.7:

Rezone lands north of the Fosterstown Link Road from 'RA' to 'MC' and include an additional objective for Fosterstown Masterplan (MP8G) in Chapter 4 to state:

*Consider the provision of a hotel at a suitable location within the Fosterstown lands*

## Community Infrastructure

### CE SH 8.8:

Rezone lands at St. Colmcille's GAA club CI.

## Masterplans

### CE SH 8.9:

Separate Seatown Masterplan (MP8D) into two separate Masterplans. The existing distributor road shall be the boundary.

### CE SH 8.10:

Include new objectives in Chapter 4, as follows:

#### **Seatown North MasterPlan**

- *Future development shall provide a strong urban edge with attractive elevations which satisfactorily address, overlook and provide a high degree of informal supervision of the R132 and the east-west distributor road going through Swords Business Park.*
- *Provide for appropriate relationship and integration of development with the R132 and the proposed new Metro North at this location.*
- *Higher/denser development shall provide a key urban edge adjoining the R132 and the east- west distributor road.*
- *Lower density family houses may be considered along the northern part of these lands adjoining Seatown Road.*
- *Provide for the protection of the residential amenities of existing housing adjoining the subject lands by minimising visual intrusion, overlooking and overshadowing and additional traffic.*
- *Reserve a School site as required in consultation with the Department of Education and Skills.*
- *Retain and consolidate existing trees and hedgerows within and bounding the Master Plan lands in as far as is practicable.*
- *Develop direct, attractive and overlooked pedestrian and cycle routes within the subject lands and connecting these lands to the proposed new Metro North; Swords town centre, Seatown Road and the Malahide Estuary.*
- *Provide for the proposed Sutton to Swords cycle route along the east- west distributor road.*
- *Provide for appropriate uses and layout on lands adjoining the M1*

#### **Seatown South Masterplan**

- *Future development shall provide a strong urban edge with attractive elevations which satisfactorily address, overlook and provide a high degree of informal supervision of the R132 and the east- west distributor road going through Swords Business Park.*
- *Provide for an appropriate relationship and integration of development with the R132 and the proposed new Metro North at this location.*
- *Provide for a vehicular connection between the subject lands and the Malahide Road.*
- *Higher/denser development shall provide a key urban edge adjoining the R132 and the east- west distributor road.*
- *Lower density family houses may be considered along the southern parts of these lands adjoining existing residential development.*
- *Provide for the protection of the residential amenities of existing housing adjoining the subject lands by minimising visual intrusion, overlooking and overshadowing and additional traffic.*

# PART TWO

---

- *Retain and consolidate existing trees and hedgerows within and bounding the Masterplan lands in as far as is practicable.*
- *Develop direct, attractive and overlooked pedestrian and cycle routes, within the subject lands and connecting these lands to the proposed new Metro North; Swords town centre and the Malahide Estuary.*
- *Provide for appropriate uses and layout on lands adjoining the M1.*
- *Reserve a school site as required in conjunction with the Department of Education and Skills.*

## **CE SH8.11**

Rezoning the private roads within the Pavilions as MC.

# PART TWO

## Sheet 9

## Malahide – Portmarnock

### Submissions Received Relevant To This Sheet

D00011, D00073, D00163, D00171, D00228, D00232, D00398, D00413, D00418, D00420, D00421, D00423, D00449, D00504, D00509, D00518, D00520, D00530, D00537, D00560, D00580, D00612, D00620, D00628, D00635, D00646, D00659, D00678, D00682, D00684, D00687, D00672, D00695, D00697, D00698, D00701, D00718, D00725, D00726, D00730, D00738, D00739, D00745. D00929.

(Please see appendices for map based changes).

### Summary of Issues

#### Rezoning to Residential (RS or RA)

A significant number of rezoning requests seek a change of zoning status to residential use on lands at Kinsealy, Streamstown, Portmarnock, Mayne Road, Swords Road, Malahide Road, The Grange (Malahide), Blackwood Lane, Seamount, Strand Road, Feltrim, Carr's Lane and Seabury.

The majority of submissions seek a RS or RA zoning, in place of Green Belt, High Amenity, Open Space or Community Infrastructure zoning. Submissions received also request the removal of density restrictions on lands at Back Road, Malahide and Blackwood Lane, Malahide.

#### Local Objectives for Rural Housing

Three submissions sought the inclusion of new local objectives to provide for either individual or multiple rural houses at Blackwood Lane, Malahide; Strand Road, Portmarnock and Seabury, Malahide.

#### Extension of Kinsealy Rural Village

A large number of submissions were received requesting an extension to the existing Kinsealy Rural Village zoning. Other submissions expressed concern with the existing RV zoning in Kinsealy.

#### Rezoning to RC

One submission received is looking for a new Rural Cluster zoning at Feltrim Road, to provide for one dwelling unit.

#### Rezoning to TC or LC

One submission was received (on behalf of Aldi Stores Ltd) regarding lands adjacent to the White Sands Hotel in Portmarnock, seeking the rezoning of land from RS to TC or LC.

#### New/Amended Local Objectives

There were 3 no. submissions received requesting the re-instatement of the following Local Objectives:

- Local Objective 210 (Robswall Cottages and Castle, Malahide);
- Local Objective 341 (Seamount, Malahide);
- Local Objective 387 (Kinsealy Garden Centre)

Two submissions requested an amendment to Local Objective 49 which relates to new entrances onto Dublin Road between Streamstown Lane and Swords Road Junction.

Other submissions requested the insertion of new Local Objectives as follows:

# PART TWO

---

- Provide a cemetery on lands at Kinsealy Village / Baskin Lane.
- Provide a retirement village and / or community facility such as a pastoral centre and bowling green at the Old Holy Family Church site, Portmarnock

## Local Area Plan / Masterplan Designation

One submission requests the removal of the Local Area Plan designation (LAP 9.B) from the lands at Belcamp. Another submission requested that the Masterplan designation at Auburn House, Streamstown (MP9.A) be removed as the lands fall within the Streamstown LAP.

## Roads and Footpath / Cycleways

One submission notes that the indicative road proposals on lands at Belcamp should be amended to read as per the preferred route selection study. Other submissions sought a new looped walkway to link to the Broadmeadow Way from Swords Castle Park. A number of submissions requested road / traffic upgrades to Malahide Road / Kinsealy Junction, Moyne Road upgrade; Chapel Road / Kinsealy Church junction and amended road layouts at Belcamp, Balgriffin.

## Community and Open Space

One submission requests that lands at St Doolagh's Park in Balgriffin be rezoned from Objective GB (Greenbelt) to Objective CI (Community Infrastructure) to reflect the established use on site.

## Abbeville Demesne

This submission requests that the entire Abbeville Demesne be designated as an Integrated Tourism and Recreation area on Sheet 9, with the inclusion of a number of objectives relating to the development of specific uses on these lands, including private housing development.

## Feltrim Quarry

This submission requested that the lands at Feltrim Quarry be rezoned from GB (Greenbelt) to HI (Heavy Industry).

## Other

One submission requests that the sensitive landscape designation should not apply to lands at Seamount, Malahide. Another submission requests that the proposed ACA designation at Drumnigh, Old Portmarnock be removed.

## **Chief Executive's Response**

### Rezoning of Lands to Residential Development

A number of submissions requested the rezoning of lands which are currently zoned 'HA' or 'GB' to residential land use zonings (Objective 'RA' or 'RS'). These lands are located at Estuary Road, Seamount, Seabury, Streamstown, Malahide Road, Swords Road, The Grange and Blackwood Lane in Malahide; at Strand Road and Mayne Road in Portmarnock and at Carrs Lane in Balgriffin. One submission also requested the rezoning of lands from GB to OS at Snugborough, Mayne Road.

The *Ministerial Planning Guidelines on Development Plans*, issued under Section 28 of the *Planning and Development Act 2000*, state that 'zoning that is not responsive to or justifiable by reference to reasonable needs, or that substantially exceeds such needs, is not consistent with proper planning and sustainable development.' The Guidelines also make clear that in order to support public confidence in the planning system and the Development Plan process, decisions to zone land

## PART TWO

---

must be clearly justified on the basis of established need and must support the aims and strategy of the plan taking the following specific matters into account:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage policy, including conservation of habitats and other sensitive areas.

These rezoning submissions seek to allow residential development on lands located within strategic Greenbelt areas and sensitive High Amenity lands and they cannot be justified based on the specific issues outlined above, whilst significant residential zoned lands (Objective 'RA', 'RS', 'RC' and 'RV') remain undeveloped.

Such a development pattern would result in deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and a poor quality, fragmented rural environment and the erosion of Greenbelt and High Amenity areas.

The quantum and location of zoned land in the County is directly influenced by the Development Plan's Settlement and Core Strategy. The *Planning and Development (Amendment) Act 2010* introduced the requirement for an evidence based 'Core Strategy' to be provided in Development Plans. The Core Strategy identifies the quantum and location of development for the plan period that is consistent with the regionally defined population targets and settlement hierarchy, and, which reflects the availability of existing services, planned investment, sequential development and environmental requirements. The Core Strategy sets out the specific population targets and housing requirements across the County and the elements of the settlement hierarchy thereby act as a clear framework for amendments to existing zonings. The Core Strategy must demonstrate that the development objectives in the Development Plan are consistent with the National Spatial Strategy and Regional Planning Guidelines.

Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period.

The Greenbelt separating Swords, Malahide, Portmarnock, Baldoyle and Balgriffin is one of the most critical in the County having regard to the close proximity of each of these areas to one another. Any encroachment into this strategic Greenbelt area would result in coalescence and the loss of definition between urban and rural areas. It is also not considered necessary or appropriate to rezone any of the greenbelt lands at Snugborough to open space zoning. Furthermore, the Council is fully committed to the continued protection of the Greenbelt and to allow for any additional housing in this area would seriously undermine the long standing Greenbelt policy of the Council and would be contrary to the zoning objective and vision to protect Greenbelts as set out in the Draft Plan.

The rezoning of HA lands is not appropriate as such a change in designation would result in the erosion of the high amenity value of these lands. The HA lands adjoin the estuary and coast and the loss of same would contribute to a significant diminution of the area's landscape value. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear,

## PART TWO

---

that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period.

In conclusion, the rezoning of additional lands currently zoned 'HA' and 'GB' would facilitate the uncoordinated, ad-hoc provision of unsustainable urban generated housing detached from existing designated settlements for which there is no evidence-based need or planning rationale and would result in an amended Core Strategy that would be contrary to the *National Spatial Strategy* and *Regional Planning Guidelines* and is, therefore, contrary to proper planning and sustainable development of the County.

### Old Holy Family Church Site, Limetree Avenue, Portmarnock

One submission received requests that these lands be zoned from Objective 'CI' to 'RS', with a local objective attached to provide a community facility such as a pastoral centre and bowling green. The lands in question are zoned Objective 'CI'– Community Infrastructure" which seeks to "Provide for and protect civic, religious, community, education, health care and social infrastructure." The vision for this zoning objective aims to "protect and promote an inclusive County, accessible to all members of the community, facilitating the sustainable development of necessary community, health, religious, educational, social and civic infrastructure. (...) It is important to facilitate the development and expansion of such services in order to deliver a quality environment whilst improving the quality of life for all."

There are a variety of land uses permitted in principle within 'CI' zoned land including Community Facility, Cultural Facility, Health Centre, Hospital, Open Space, Place of Worship and Residential Care Home/Retirement Home amongst others. It is considered that the attachment of a Local Objective may serve to restrict future development at this site for other types of community infrastructure and would be unduly restrictive on the landowner. It is therefore considered unnecessary and inappropriate to add a map based Local Objective such as that proposed.

However, the submission notes that the landowner wishes to rezone the lands to Objective 'RS' to enable the development of independent housing for the elderly. It is submitted that the Development Plan land use definitions for residential care home / retirement home do not allow for independent living units for the elderly within this zoning objective. It is therefore considered appropriate to include a new land use definition within Appendix 4 of the Draft Plan to clarify the scope of independent living / assisted living units. It is also recommended that Chapter 11 be amended accordingly to outline the land use zoning objectives / matrix which are suitable for this type of development.

### Local Objectives for Rural Housing

Three submissions sought the inclusion of new local objectives to provide for either individual or multiple rural houses at Blackwood Lane, Malahide; Strand Road, Portmarnock and Seabury, Malahide.

Further to the response outlined above, the Rural Settlement Strategy as set out in the Draft Plan reflects the existing policy in the current FDP 2011-2017. The policy recognises the need to provide for housing for the rural community but limits the amount of housing in the open countryside and provides for alternative options within the rural area either in the villages or rural clusters as a more sustainable and suitable location for rural generated housing.

The quantum and location of zoned land in the County is directly influenced by the Development Plan's Settlement and Core Strategy. The *Planning and Development (Amendment) Act 2010*

# PART TWO

---

introduced the requirement for an evidence based 'Core Strategy' to be provided in Development Plans. The Core Strategy identifies the quantum and location of development for the plan period that is consistent with the regionally defined population targets and settlement hierarchy, and, which reflects the availability of existing services, planned investment, sequential development and environmental requirements. The Core Strategy sets out the specific population targets and housing requirements across the County and the elements of the settlement hierarchy thereby act as a clear framework for amendments to existing zonings. The Core Strategy must demonstrate that the development objectives in the Development Plan are consistent with the National Spatial Strategy and Regional Planning Guidelines.

Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period.

Allowing certain individuals to be excluded from this policy would contradict this overall approach and be contrary to the proper planning and sustainable development of the area. The inclusion of objectives facilitating one-off dwellings would allow the sale of these sites on the open market, thereby opening up the possibility of urban-generated housing development. Government policy as articulated by the National Spatial Strategy and the *Sustainable Rural Housing: Guidelines for Planning Authorities* of April 2005, classifies the rural area of Fingal as "an area under strong urban influence" where the housing requirements of the rural community should be facilitated but urban-generated housing should be directed to areas zoned for new residential development in cities, towns and villages. This approach is reflected in the *Regional Planning Guidelines for the Greater Dublin Area*. The inclusion of objectives in the Draft Plan facilitating the development of rural housing outside of the provisions of the Rural Settlement Strategy would thus run counter to national and regional policy.

The inclusion of map based local objectives, which would be at odds with (i.e. not consistent with) the policies and objectives contained within the provisions of the relevant chapter of the Development Plan or Appendices are legally flawed and open to legal challenge. Any local objectives that render nugatory relevant policy considerations including Guidelines which specify criteria for new dwellings or eligibility for planning permission for new rural housing cannot be considered to be consistent with the sustainability principles that inform these policy considerations and adopted criteria.

There is therefore a lack of an evidence based need or planning rationale for the inclusion of objectives providing for additional housing in the Greenbelt and High Amenity areas, and as such would conflict with the policy and guidance outlined above. In conclusion, the inclusion of local objectives on lands zoned 'HA' and 'GB' would facilitate the uncoordinated, ad-hoc provision of unsustainable urban generated housing detached from existing designated settlements for which there is no evidence-based need or planning rationale and would result in an amended Core Strategy that would be contrary to the *National Spatial Strategy* and *Regional Planning Guidelines* and is, therefore, contrary to proper planning and sustainable development of the County.

## Extension to Kinsealy RV Zoning

A large number of submissions seek to extend the RV zoning at Kinsealy and to zone other lands in close proximity to the Village for residential development. Submissions were also received which object to any further development within Kinsealy Village given the existing infrastructural deficiencies (roads and sewerage) and potential impact on the character of the rural village.

## PART TWO

The rezoning of any additional land to Objective 'RS' or 'RV' at Kinsealy Village (and surrounds) to further extend the existing boundary would directly conflict with the Core Strategy and Settlement Strategy of the Draft Plan and is therefore not supported by any evidence based planning rationale. The quantum and location of zoned land in the County is directly influenced by the Development Plan's Settlement and Core Strategy, which seeks to accommodate projected population growth in the County in a strategic and planned manner. The Core Strategy must demonstrate that the development objectives in the Development Plan are consistent with the *National Spatial Strategy* and the *Regional Planning Guidelines*.

The allocation of housing unit numbers for the entire County area has been thoroughly analysed and addressed in the context of the Core Strategy of the Draft Plan 2017-2023 based on the directions contained in the RPG's. The allocation of new population growth and housing numbers within Fingal's Rural Villages supports the settlement hierarchy contained within the settlement strategy as defined within the Draft Plan.

This allocation represents a fair and equitable allocation based on:

- The overall allocation for the hinterland and metropolitan areas small towns and villages.
- The evidence-based approach adopted in the Core Strategy, where Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period.
- The capacity of the rural villages to accommodate growth without compromising their essential character, and
- The strong need to avoid any further suburbanisation of the Fingal rural villages

A large number of submissions seek to rezone extensive areas of RU, RC and GB lands across the County to RV. Cumulatively, this equates to a total of c.197.85 ha's. [488 acres] representing a substantial quantum of additional RV zoned land across the County. The change in zoning of these lands would represent a piecemeal uncoordinated rezoning of lands for which there is no evidence based need and would lead to inappropriate and unsustainable settlement patterns of development and an extensive land take of valuable agricultural, high amenity and green belt lands of which it is Council policy to protect.

The Draft Plan is explicit in the protection and promotion of the value of the rural area of Fingal and the Council is firmly committed to the continued protection of this valuable resource that cannot be continually eroded. The consequential impact of the gradual erosion of the agricultural resource from additional housing is discussed in detail in Chapter 5.

The relative control on housing development within the Greenbelt is necessary to maintain the particular rural and undeveloped nature of the Greenbelt in order to demarcate clearly the edge of established settlements, provide for the continued viability of agricultural and rural uses and promote an amenity area for citizens. The density of actual rural housing development within the Greenbelt relative to other rural areas within the County provides clear evidence of the relative success of Fingal's efforts to preserve and promote the Greenbelt. The Council is fully committed to the continued protection of the Greenbelt and the erosion of the greenbelt would seriously undermine the long standing Greenbelt policy of the Council and would be contrary to the zoning objective and vision to protect Greenbelts as set out in the current FDP 2011- 2017 and the Draft Plan 2017-2023 and as such is contrary to proper planning and sustainable development of the area.

These submissions seek residential development beyond the outer edge of the existing RV zoned areas of Kinsealy, while considerable development opportunities currently exist within the existing rural villages and rural clusters across the County. Such a development pattern would

## PART TWO

---

result in deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and the loss of agricultural and green belt lands.

These considerations have formed the core basis of the approach of the local area planning of Fingal rural villages both within the hinterland and metropolitan areas. There is no evidence based reason or planning rationale for the widespread re-zonings of RU, RC and GB zoned lands to RV across the County and specifically within the areas identified in Kinsealy.

It should also be noted that the quantum of RV zoning in Kinsealy village has almost doubled since the adoption of the 2005 Fingal Development Plan from 16.49 ha to the proposed 29.10 ha contained in the Draft Plan. Further zoning to accommodate additional residential development in this small rural village is therefore not justified.

To significantly extend residential development beyond the outer edge of the existing built-up Village area while more preferably located lands lie undeveloped would result in deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and a poor quality, fragmented urban environment.

Furthermore, much of the land proposed for inclusion within the RV boundary is currently zoned as a Greenbelt and forms part of the important strategic Greenbelt separating Malahide and Kinsealy. The preservation of this Greenbelt area is essential to ensure existing urban areas within Fingal do not coalesce and merge into one another. Any erosion of the Greenbelt undermines this approach.

A Local Area Plan for Kinsealy is currently in preparation. This is the most appropriate planning vehicle in which to consider the existing extent of the RV zoning. Consideration may be given to further amend the extent of the RV zoning boundary where it can be clearly shown that this contributes significantly to the development objectives for the village, and that there is a clear evidence base for such a proposed change. This LAP process will involve community consultation and will reflect the feedback from both submissions and face to face meetings at local consultation sessions with the local community. The LAP will include objectives to protect and enhance the distinctive character and heritage of the village and will set out the future planning framework for the overall co-ordinated development of the village.

It is considered that there is merit in the re-zoning of a small contiguous section of land to the north of the existing RV boundary (approx. 2.3 hectares) to rationalise and consolidate the existing RV boundary and to reflect the surrounding land uses. These lands adjoin Kinsealy Business Park and Kinsealy Lane and include a new nursing home, which is currently under construction (Reg Ref: F12A/0141). The nursing home occupies the majority of these lands with an area of just 0.6ha remaining, which represents a small incremental increase of RV zoned land relative to the size of the existing settlement and which would facilitate the development of a small number of houses.

One submission also requested that Kinsealy Garden Centre be rezoned from Objective 'GB' to 'RB'. However, it is considered that the 'RV' zoning is more appropriate for these lands given the existing uses on site and its location within the Village. It is considered that the inclusion of these lands within the RV boundary would consolidate the development of Kinsealy Village and appropriately reflect the existing established land use on site, thus creating a more balanced approach to the overall development of the Village area.

## PART TWO

---

In conclusion, there is an adequate amount of land zoned for the orderly development of Kinsealy Village. Substantial lands in the RV zoned area remain undeveloped. Large scale additional zoning is not required, having regard to the quantity of existing RV zoned land in the County. Such proposals would be in clear and significant contravention of the adopted Local Area Plans, the Core and Settlement Strategies of the current FDP 2011-2017 and the Draft Plan 2017-2023, the *Greater Dublin Area Regional Planning Guidelines 2010 – 2022* and as such would be contrary to proper planning and sustainable development of the area.

### Amendment to Kinsealy House boundary

One submission notes that the Kinsealy House RV boundary does not co-incide with either field or land ownership boundaries. It is noted that this mapping delineation poses a difficulty for the land owners if they wish to develop the full legal extent of the lands in compliance with their RV zoning, as it leaves a small isolated strip of lands zoned 'GB'. This is acknowledged by the Council as a mapping error and it is recommended that the boundary be amended accordingly.

### Rural Cluster Zoning

There are currently thirty four existing Rural Clusters within the Draft Plan to cater for rural generated housing need. These Rural Clusters have a strong residential focus and are based on a small number of individual houses and typically take the form of between 5 and 15 dwellings. They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small clusters. For the most part, they will provide an opportunity for family members of existing households within the cluster to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

A large number of submissions were received seeking to rezone RU/RB/GB/HA lands to RC across the County. The majority of these proposals are new RC's with the remainder proposing extensions to existing RC's across the County. The Council considers there is no merit in rezoning new RC's or large scale extensions to existing RC's within the County based on the rationale set out in this CE Report.

There is sufficient land in the County zoned RC and, as such, there is no planning rationale for a new Rural Cluster designation to the rear of No. 1 Feltrim Road in Streamstown. The land is currently zoned GB which is considered to be the most appropriate zoning designation for this site. The lands proposed for the new RC comprise c. 0.19ha's. [0.46 acres] and are located to the rear of an existing dwelling on the Feltrim Road within this strategic greenbelt area separating the built up areas of Malahide and Kinsealy.

The Rural Settlement Strategy in the Draft Development Plan recognises the need to provide for housing for the rural community but limits the amount of housing in the open countryside and provides for alternative options within the rural / greenbelt areas either in the villages or in rural clusters as a more sustainable and suitable location for rural generated housing.

The *Ministerial Planning Guidelines on Development Plans*, issued under Section 28 of the *Planning and Development Act 2000*, state "zoning that is not responsive to or justifiable by reference to reasonable needs, or that substantially exceeds such needs, is not consistent with proper planning and sustainable development." The Guidelines also make clear that in order to support public confidence in the planning system and the development plan, decisions to zone land must be clearly justified on the basis of established need and must support the aims and strategy of the plan taking the following specific matters into account:

# PART TWO

---

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage policy, including conservation of habitats and other sensitive areas.

The zoning of these lands cannot be justified on the matters outlined above. These submissions propose residential development beyond existing RC zoning, while RC zoned lands remain undeveloped and are sufficient in area to accommodate local rural based housing need. Such a development pattern would result in deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and the loss of extensive areas of agricultural land.

The quantum and location of zoned land in the County is directly influenced by the Development Plan's Settlement and Core Strategy. The *Planning and Development (Amendment) Act 2010* introduced the requirement for an evidence based 'Core Strategy' to be provided in Development Plans. The Core Strategy identifies the quantum and location of development for the plan period that is consistent with the regionally defined population targets and settlement hierarchy, and, which reflects the availability of existing services, planned investment, sequential development and environmental requirements. The Core Strategy sets out the specific population targets and housing requirements across the County and the elements of the settlement hierarchy thereby act as a clear framework for amendments to existing zonings. The Core Strategy must demonstrate that the development objectives in the Development Plan are consistent with the National Spatial Strategy and Regional Planning Guidelines.

Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period.

Allowing certain individuals to be excluded from this policy would contradict this overall approach and be contrary to the proper planning and sustainable development of the area. There is a lack of an evidence based need or planning rationale for these lands to be rezoned as a Rural Cluster, therefore, the inclusion of the proposed zoning would conflict with the policy and guidance outlined above. The exemption of certain sites from compliance with the relevant policies and guidelines would lead to an increase in the number of houses being developed in the rural greenbelt areas, thus creating inappropriate and unsustainable settlement patterns which would be contrary to proper planning and sustainable development of the area.

In conclusion, the rezoning of these lands would facilitate the uncoordinated, ad hoc provision of unsustainable urban generated housing detached from existing designated settlements. There is no evidence based need or planning rationale for the proposed zoning which would be in breach of the Core Strategy of both the FDP 2011-2017, the Draft Plan 2017-2023 and the Regional Planning Guidelines 2010-2022 and as such would be contrary to proper planning and sustainable development.

## Rezoning of lands to TC/ LC (Town and District Centre / Local Centre)

One submission requests the rezoning of lands adjoining the White Sands Hotel in Portmarnock from 'RS' to 'LC' or 'TC'. The RS zoning is considered to be the most suitable for the site, having regard to existing land uses in the vicinity and the 'TC' and 'LC' zonings to the south and west of

## PART TWO

the site. The site is located at the northern end of the development boundary of Portmarnock. The consolidation of the core of Portmarnock town centre is facilitated within the TC zoning of the town centre area. Consolidation and the development of key infill sites within our towns and villages is necessary to reinforce urban centres as the central hub of activity resulting in vibrant and bustling towns and villages with a diverse mix of activities. Intensifying development within our urban areas can only occur by utilising under-developed sites within the town and village centres. Rezoning of these lands to TC or LC would undermine the existing town centre zoning and the policy of consolidation of existing TC and LC areas. It is recommended that the lands therefore remain zoned Objective 'RS'.

### New/Amended Local Objectives

The submission requesting that a Local Objective be included to provide a cemetery at Kinsealy / Baskin is noted. However, it is not considered necessary to attach a local objective as the lands are zoned Objective 'GB', and burial grounds are 'permitted in principle' within this zoning objective. The development management process is the most appropriate method to assess such proposals under normal planning considerations.

Two submissions requested amendments to the wording of Local Objective 49, which currently reads as: *'49: No new or widened vehicular entrances will be allowed onto the Dublin Road between Streamstown Lane and the Swords Junction.'*

The landscape setting of this road along the approach to Malahide is of significance in terms of the character it establishes as well as the ecological benefits. This is recognised in Objective MALAHIDE 2 of the Draft Plan. To facilitate additional entrances along this road would result in habitat and tree loss, to the detriment of the character of the area. The Streamstown LAP indicates that suitable access to development within these lands adjoining the Malahide Road, where increased densities are sought, should be provided via Streamstown or Carey's Lanes. There is adequate scope within the existing local objectives to facilitate residential development in this area.

However, in an effort to balance the need to provide access to residentially zoned lands, whilst at the same time protect the character and rural nature of the notable approach to Malahide, it is considered appropriate to amend the wording of Local Objective 49 to read as follows:

*'LO 49: New or widened entrances onto the Dublin Road between Streamstown lane and the Swords Junction will be restricted, to ensure the protection of the mature tree-lined approach along the Dublin Road to Malahide.'*

There were 3 no. submissions received requesting the re-instatement of the following Local Objectives:

- Local Objective 210 (Robswall Cottages and Castle, Malahide);
- Local Objective 341 (Seamount, Malahide);
- Local Objective 387 (Kinsealy Garden Centre)

LO 210 relates to lands at Robswall Cottages and the submission seeks the re-instatement of LO 210 (from the 2005-2011 Fingal Development Plan) or the rezoning of the lands from 'HA' to 'RS' zoning. The site in question (Reg Ref: F08A/1407) is the subject of an enforcement file. Council Reports to date indicate that the development commenced after the application for an extension of duration was refused planning permission and after the original planning permission had expired. The applicant has failed to demonstrate compliance with Fingal's Rural Settlement Strategy in relation to these lands. It is therefore not recommended that the lands be rezoned to

## PART TWO

---

residential and it is not considered appropriate to re-instate a local objective in this regard. It is recommended that the site be restored to its greenfield status, in accordance with the HA zoning designation.

LO 341 relates to lands at Seamount, Malahide and states the following: *'Maximum ridge height residential development of 48m O.D.'* Planning permission has been granted on these lands, so it is not considered necessary to re-instate a local objective regarding height restrictions on site. Any subsequent application that may be lodged will be dealt with under the development management process.

LO 387 relates to lands at Kinsealy Garden Centre and states the following: *'Facilitate the provision of a craft centre and customer related facilities and services.'* It is considered that there is no clear evidence demonstrating there is demand for such a use within this area. Any application lodged for a craft centre will be assessed under the Development Management process.

### Removal of Local Area Plan / Masterplan Designations and Removal of Density Restrictions

One submission requests the removal of the Local Area Plan designation (LAP 9.B) from the lands at Belcamp. Another submission requested that the Masterplan designation at Auburn House, Streamstown (MP9.A) be removed as the lands fall within the Streamstown LAP.

Section 3.2 of the Draft Plan (Strategic Development Zones, Local Area Plans, Masterplans and Urban Framework Plans), outlines the range of plans which give detailed guidance for future development for specific areas of the County. These plans are a mix of statutory and non-statutory guidance documents prepared to create a vision for particular areas which must be consistent with the Development Plan and zonings. These plans are necessary to guide and inform both the community and developers as to how the area will develop in the future.

The Draft Plan sets the context and zoning designations for Local Area Plans (LAPs), which play an important role in setting the framework for the achievement of integrated and balanced communities within a specified area. They seek to provide the optimal development framework to ensure the protection and enhancement of the existing areas, key features and the environment within an area, while providing for a high quality living environment through the use of robust urban design principles. The function of a Local Area Plan is to take a detailed look at a specific area, identifying and analysing the various issues of relevance, before establishing and setting out principles for the future development of the area.

The preparation of Masterplans will assist in achieving quality developments in terms of, inter alia, urban design, structure, delivery of community/amenity facilities and permeability. The Draft Plan identifies large or key sites that will require the preparation of approved Masterplans and subsequent planning applications will be required to adhere to the approved Masterplans. The Planning Authority considers Masterplans as an effective means of guiding new development and providing essential social and infrastructure in a phased and sustainable manner.

It is not considered appropriate to remove LAP or MP designations as these documents will guide the future development of these areas.

### Density Caps / Restrictions

Submissions received have requested the removal of the density cap of 10 units per hectare at Auburn House in Streamstown and to remove the density cap of 5 units per hectare at Back

## PART TWO

---

Road, Malahide. Another submission seeks the rezoning of lands to RA with the inclusion of a new objective to allow for 10 units per hectare at Seabury in Malahide.

The lands at Back Road in Malahide are considered to be suitable for low density development only as the lands are located on the edge of a built up area and are located within a sensitive landscape setting in close proximity to Malahide Demense. It is recommended therefore that the density restriction be retained at this location.

It is considered that a master plan is necessary for the lands at Auburn House, Streamstown to provide for a detailed design framework which best guides the development of the area. Having consideration to the location of the subject lands, it is recommended that low density development, reflective of the area and to be determined by way of a wider masterplan, is appropriate and in accordance with the County Settlement Hierarchy. It is therefore recommended that the reference to the density of 10 units per hectare be removed and that the lands at Streamstown will facilitate low density residential development reflective of the character of the area.

On foot of the submission received and having reviewed the requirement for a Masterplan at this location, it is recommended that the following objectives be added to the section on Streamstown Masterplan (page 110 of the Draft Plan):

### *Streamstown Masterplan*

- 
- *Facilitate low density residential development reflective of the character of the area.*
- *Protect and preserve trees, woodlands and hedgerows within the Masterplan area.*
- *Preserve the tree lined approach to Malahide along the Dublin Road.*
- *Facilitate high quality sustainable development that protects and enhances the sensitive historic and natural setting of Auburn House and integrates new development with the conservation and preservation of the protected structure, its curtilage and protected trees.*
- *retain visual corridors to/from Auburn house through the establishment of a visual buffer to the east of Auburn House.*
- *The area for development north of Auburn House is considered a sensitive development zone, whereby a maximum ridge height of 6m should be applied*
- *Provide for a pedestrian / cycle route along the Auburn House avenue to Malahide Road.*
- *Ensure pedestrian connectivity between Auburn House Avenue and Abington/Gaybrook/Castleheath.*

The local objective to restrict the density on lands at Seabury in Malahide to 10 units per hectare is related to the request to rezone these lands from 'GB' to 'RA' (with the inclusion of a new Local Objective to restrict the density) and is therefore already addressed in relation to rezoning of lands from GB to residential.

### Footpaths / Cycleways and Road Improvements

Road junction improvements and footpath / cycleway provision are most appropriately dealt with through the Council's Capital Works Programme and through the Operations Department. Further information on roads is provided in the CE Response to Chapter 7 (Infrastructure and Movement).

It is considered that the process of identifying and seeking resource allocation for the upgrade and provision of footpaths and cycleways is more appropriately addressed through the established Area Committee procedure rather than in a strategic Development Plan document.

# PART TWO

---

The Broadmeadow Way is a proposed pedestrian / cycle trail between Donabate and Malahide. It is a critical link in the Fingal Coastal Way route as it spans the Malahide Estuary, thereby linking the two peninsulas. The Council is currently progressing this project through the required statutory planning and environmental approvals process. The indicative route is illustrated on the relevant Sheets / Maps. All routes indicated on maps are indicative with scope for amending routes / including new looped routes to Swords Castle, etc, as required.

A number of the road improvements required and highlighted in submissions received are included within Table 7.1 'Road Schemes' of the Draft Plan. It should be noted that the road alignments illustrated on Development Plan maps are indicative only and will be subject to public consultation at a more detailed design stage.

## Feltrim Quarry

It is not considered necessary or appropriate to rezone these lands from GB to HI. 'Extractive Industry/Quarrying' is a use which is 'Open for Consideration' within zoning Objective GB and the existing quarrying operations are well established at this location.

The subject lands occupy a strategic site within the Greenbelt area separating Malahide from Swords, which is under significant development pressure. Rezoning of these lands from Greenbelt to Heavy Industry would lead to significant encroachment into the designated Greenbelt lands, and be to the detriment of the rural character of the area and surrounding land uses. As such, it would be contrary to the proper planning and sustainable development of the area.

## Abbeville Demesne

One submission received requests that the entire Abbeville Demesne be designated as an Integrated Tourism and Recreation area, to include a number of objectives relating to the development of specific uses on these lands including housing. Abbeville Demesne is one of a number of locations included as an Integrated Tourism Complex within Chapter 6 of the Draft Plan. The nature and extent of uses considered appropriate for each location has been set out under this heading. The description provided for Abbeville Demesne highlights the conservation of the house and its surroundings which are considered of major architectural importance and the special landscape character and heritage features of the demesne.

Objective ED68 is applicable to the lands at Abbeville and seeks to:

*'Facilitate, where appropriate, the conversion of former demesnes and estates and their outbuildings into integrated tourist, leisure and recreational complex type developments subject to architectural conservation best practice and proper planning and sustainable development.'*

Chapter 6 at present states the following in relation to Abbeville Demesne:

*'An integrated tourism and recreational complex is encouraged on Abbeyville Demesne. This shall incorporate facilities which may include: Hotel / Conference Centre, Golf Course, Fitness Centre and at least one other extensive tourist/recreational facility. A strictly limited number of dwelling units, preferably grouped in a courtyard type configuration, which shall be reserved for tourism use. The nature and extent of the facilities to be provided shall be determined primarily by the need to conserve the house and its surroundings, which are of major architectural importance, and the special landscape character and heritage features of the demesne.'*

## PART TWO

---

And the corresponding objective states:

*Facilitate, where appropriate, the conversion of former demesnes and estates and their outbuildings into integrated tourist, leisure and recreational complex type developments subject to architectural conservation best practice and proper planning and sustainable development.*

The Demesne lands have a significant heritage and planning history. Abbeville House is a Protected Structure (RPS Ref. 452) of national importance. It is the work of renowned architects and was also the home of historically important figures from the 18<sup>th</sup> century through to the early 21<sup>st</sup> century. The house and lands forming the demesne are also designated as an Architectural Conservation Area (ACA), with historic woodlands and other natural and man-made features and landscape features.

Since the beginning of this century the Demesne has gone through a transition period, during which it temporarily lost its integrity and occupancy such that the condition of the house, buildings, woodlands and Demesne features deteriorated. Unless there is substantial investment based on a viable future business plan and protection through occupation and use, the integrity of the Demesne and associated complex are at risk.

Objective CH 21 relates to a relaxation of site zoning restrictions in relation to the protected structures on a site. This objective affords a level of flexibility for the future use of existing protected structures on a site, to ensure their preservation and conservation. In order to emphasise the flexibility included in Objective CH21 and to encourage the development of the Demesne lands, whilst ensuring their protection and conservation, it is recommended that the text included within the written statement (Chapter 6) and the corresponding objective in Chapter 10 be amended as follows:

### *Abbeville*

*The existing building complex is very extensive and accommodates a number of structures and attractive buildings in an extensive demesne type landscape. It is an exceptional site which, in the event of it no longer being suitable for residential use, could be re-used to provide for future tourism, amenity and other recreational needs within the County. There is a need to examine options regarding the optimal re-use and refurbishment of the complex of buildings within the demesne setting, to ensure the future sustainable use of this important and unique resource.*

*The nature and extent of the facilities to be provided shall be determined primarily by the need to conserve the house and its surroundings, which are of major architectural importance, and the special landscape character and heritage features of the demesne.*

An integrated tourism and recreational complex is encouraged on Abbeyville Demesne. This shall incorporate facilities which may include: Hotel / Conference Centre, Golf Course, Fitness Centre and at least one other extensive tourist/recreational facility. A strictly limited number of dwelling units, grouped in a courtyard type configuration, *with the majority of the dwellings to be reserved for tourism use.* ~~which shall be reserved for tourism use.~~

New Objective CHXX to be included within Chapter 10 (Cultural Heritage):

*'Support, in accordance with CH21, the development of an integrated tourism and recreational complex on Abbeyville Demesne, incorporating facilities which may include: Hotel / Conference Centre, Golf Course, Fitness Centre and at least one other extensive tourist/recreational facility. A strictly limited number of dwelling units, grouped in a courtyard type configuration, the majority of which shall be reserved for tourism use may be considered. The nature and extent of the facilities to be provided shall be determined primarily by the need to conserve and rehabilitate the house and its*

## PART TWO

---

*surroundings, which are of major architectural importance, and the special landscape character and heritage features of the demesne.'*

It is not therefore considered necessary to include any further map based local objectives in relation to Abbeville Demesne, given the inclusion of the above text and objectives within the written statement.

### St Doolagh's Park, Balgriffin

One submission requests that lands at St Doolagh's Park in Balgriffin be rezoned from Objective GB (Greenbelt) to Objective CI (Community Infrastructure) to reflect the established use on site. It is not considered necessary or appropriate to rezone these lands from 'GB' to 'CI' and the existing nursing home development is well established at this location. St. Doolagh's Park is a Protected Structure (RPS No. 460). The Care and Rehabilitation Centre is a modern detached structure within the grounds of St. Doolagh's Park located on the southern side of the house.

The subject lands occupy a strategic site within the Greenbelt area separating Kinsealy from Portmarnock and South Fingal, which is under significant development pressure. Rezoning of these lands from Greenbelt to Community Infrastructure would lead to significant encroachment into the designated Greenbelt lands, and be to the detriment of the rural character of the area and surrounding land uses. As such, it would be contrary to the proper planning and sustainable development of the area and to the protection and conservation of St Doolagh's Park (RPS No. 460).

### ACA Designation at Old Portmarnock (Drumnigh Road)

One submission received requested the removal of the ACA designation at Old Portmarnock (Drumnigh Road). These lands have been included within a designated ACA to secure the protection of a number of historic buildings in this area, many of which have been built using brick from the Portmarnock Brick and Terracotta Works established in the late 19<sup>th</sup> Century by the Plunkett family, including Hillsdene, Shellmartin (St. John's), Banff, Dunkeld, The Cottage and Plunkett Cottages. Portmarnock Brickworks was an important Irish manufacturer of brick and terracotta during the Victorian period, with its products used by many of the most significant architects of the time. It supplied much of the brick used in St. Ita's Hospital, Portrane (the former Portrane Asylum) and in the Red Stables at St. Anne's Raheny. The brickworks (which are no longer in existence) were sited just to the east of the boundary of the proposed ACA and the connections between the Brickworks and these buildings are of technical, historical and artistic significance. It is therefore recommended that this ACA designation remains in place.

### Sensitive Landscape Designation at Seamount

One submission requested that the sensitive landscape designation be removed from lands at Seamount, Malahide. The Draft Plan's Landscape Character Assessment (LCA) provides for the classification of Fingal's landscapes into the following (1) types and values and (2) sensitivities. The LCA divides the County into 6 Landscape Character Types representing generic areas of distinctive character that makes one landscape different from another such as uplands or the coast. The LCA places a value on each Landscape Character Type ranging from exceptional to low. Sensitivity is evaluated using criteria ranging from high to low. A highly sensitive landscape is likely to be vulnerable to change whereas a landscape with a low sensitivity is likely to be less at risk from change. The LCA will inform decision making in relation to the protection of the environment, natural resources and heritage and will be used to guide development.

It is not considered appropriate to remove one specific location from the Draft Plan's Landscape Character Assessment.

# PART TWO

---

## **Recommendations:**

### **CE SH 9.1:**

It is recommended that a new land use definition be included within Appendix 4 of the Draft Plan to clarify the scope of independent living units / assisted living units, as follows:

#### *Sheltered Accommodation*

*Housing schemes with onsite communal facilities for assisted independent living. Sheltered housing schemes usually have an on-site warden and include care supports such as the provision of meals and health care assistance. Communal on site facilities can include recreation areas, alarm systems and a laundry.*

### **CE SH 9.2:**

It is also recommended that the land use zoning objectives / matrix within Chapter 11 be amended accordingly:

Sheltered Accommodation (permitted in principle within Zoning Objectives CI, LC, MC, ME, RA, RS, RV, TC).

Sheltered Accommodation (not permitted in principle within Zoning Objectives DA, FP, GB, GE, HA, HI, HT, OS, RB, RC, RU, RW, WD).

### **CE SH 9.3:**

Lands zoned Objective 'GB' north of Kinsealy RV to be rezoned to 'RV' to be included within the village development boundary.

### **CE SH 9.4:**

Amend Kinsealy House RV boundary to correlate with established field boundary at this location.

### **CE SH 9.5:**

Amend wording of Local Objective 49 to read as:

*'LO 49: New or widened entrances onto the Dublin Road between Streamstown lane and the Swords Junction will be restricted, to ensure the protection of the mature tree-lined approach along the Dublin Road to Malahide.'*

### **CE SH 9.6:**

Rezoned lands at Kinsealy Garden Centre from 'GB' to 'RV'.

### **CE SH 9.7:**

Remove reference to density of 10 units per hectare at Streamstown.

### **CE SH 9.8:**

It is recommended that the following objectives be added to the Section on Streamstown Masterplan (page 110 of the Draft Plan):

#### *Streamstown Masterplan*

- *Facilitate low density residential development reflective of the character of the area.*
- *Protect and preserve trees, woodlands and hedgerows within the Masterplan area.*
- *Preserve the tree lined approach to Malahide along the Dublin Road.*
- *Facilitate high quality sustainable development that protects and enhances the sensitive historic and natural setting of Auburn House and integrates new development with the conservation and preservation of the protected structure, its curtilage and protected trees.*
- *Retain visual corridors to/from Auburn house through the establishment of a visual buffer to the east of Auburn House.*
- *The area for development north of Auburn House is considered a sensitive development zone, whereby a maximum ridge height of 6m should be applied*

# PART TWO

---

- Provide for a pedestrian / cycle route along the Auburn House avenue to Malahide Road.
- Ensure pedestrian connectivity between Auburn House Avenue and Abington/Gaybrook/Castleheath.

## **CE SH 9.9:**

It is recommended that new text is included relating to Abbeville Demesne within the written statement (Chapter 6) to read as follows:

*The existing building complex is very extensive and accommodates a number of structures and attractive buildings in an extensive demesne type landscape. It is an exceptional site which, in the event of it no longer being suitable for residential use, could be re-used to provide for future tourism, amenity and other recreational needs within the County. There is a need to examine options regarding the optimal re-use and refurbishment of the complex of buildings within the demesne setting, to ensure the future sustainable use of this important and unique resource.*

*The nature and extent of the facilities to be provided shall be determined primarily by the need to conserve the house and its surroundings, which are of major architectural importance, and the special landscape character and heritage features of the demesne.*

*An integrated tourism and recreational complex is encouraged on Abbeyville Demesne. This shall incorporate facilities which may include: Hotel / Conference Centre, Golf Course, Fitness Centre and at least one other extensive tourist/recreational facility. A strictly limited number of dwelling units, grouped in a courtyard type configuration, with the majority of the dwellings to be reserved for tourism use. ~~which shall be reserved for tourism use.~~*

## **CE SH 9.10:**

New Objective CHXX to be included within Chapter 10 of the written statement:

*'Support, in accordance with CH21, the development of an integrated tourism and recreational complex on Abbeyville Demesne, incorporating facilities which may include: Hotel / Conference Centre, Golf Course, Fitness Centre and at least one other extensive tourist/recreational facility. A strictly limited number of dwelling units, grouped in a courtyard type configuration, the majority of which shall be reserved for tourism use may be considered. The nature and extent of the facilities to be provided shall be determined primarily by the need to conserve and rehabilitate the house and its surroundings, which are of major architectural importance, and the special landscape character and heritage features of the demesne.'*

# PART TWO

## Sheet 10 Baldoyle Howth

### Submissions Received Relevant To This Sheet

D00037, D00063, D00183, D00394, D00422, D00480, D00482, D00501, D00525, D00553, D00562, D00691, D00723, D00740,

(Please see appendices for map based changes).

### Summary of Issues

#### Rezoning to Residential (RS or RA)

A significant number of rezoning requests seek a change of zoning status to residential use on lands at Nashville Park, Windgate Road, Thormanby Road in Howth and at Brickfields, Baldoyle. The majority of submissions seek a RS or RA zoning, in place of High Amenity and Open Space zoning.

One submission received also requests an amendment to the density cap at Old Carrickbrack Road, Howth to increase the density of development from 1 unit per hectare to 2 units per hectare.

Another submission received requested that an infill dwelling be permitted in the rear garden of an existing dwelling at St Fintan's Road in Sutton. It is submitted that the Howth SAAO should not apply to these lands and requests a reassessment of the Howth SAAO boundaries.

#### Local Objectives/Specific Objectives

One submission received requests an extension to the existing 'TC' (Town and District Centre) zoning at Sutton Cross to include lands at 16 Howth Road.

Another submission requests the removal of Local Objective 98 which applies to lands at Santa Sabina in Sutton.

A further submission requested that Local Objective 527 be reinstated at the former EDROS site at Balscadden Road or that Local Objective 100 be amended / re-worded.

It is recommended that a new Local Objective be included at The Summit, Howth in another submission received. It is suggested that this objective would relate to lands at Windgate Rise, Howth and the surrounding area to read as: *'That the density permissible for infilled singular development be per the prevailing density set out on Map A of the SAAO and compatible with existing site areas of developments within the 200 metre radius of the Summit Village.'*

#### Community and Open Space / Parks Issues

The submission received from Sutton Park and Lawns Residents Association objects to the sale and any development on Brickfield Amenity Zone. It is requested that the Council include Brickfield Amenity Area into Seagrang Park for public amenity use.

Another submission requested that the lands at Brickfields in Baldoyle be rezoned from 'OS' to 'RS' with a specific local objective that the development of these lands is contingent on the upgrading of the existing Baldoyle Boxing Club and the provision of a multi-sports dressing room

# PART TWO

One submission was received in relation to Tucketts Lane Park in Howth and objects to any plans to build houses / apartments here. It is submitted that the land should be used for open space as a playground.

## Commercial

It is requested that lands at Kilbarrack be rezoned from 'GE' (general employment) to 'ME' (Metro Economic Corridor) or similar zoning, as the lands are located beside major rail infrastructure at Howth Junction. This submission also requests the preparation of a Masterplan and recommends a limit of 20,000 sq m of net retail development be permitted on these lands.

## **Chief Executive's Response**

### Rezoning of Lands to Residential Development

It is considered that there is an adequate amount of residentially zoned land in the County and within the Howth/Sutton/Baldoyle area. The majority of the rezoning requests relate to small scale infill development on lands that are zoned High Amenity ('HA'). The rezoning of HA lands is not appropriate as such a change in designation would result in the erosion of the high amenity value of these lands. The HA lands in the Howth area are some of the most sensitive in the County and the loss of same would contribute to a significant diminution of the area's landscape value.

It is not recommended that lands at Nashville Park in Howth be rezoned from high amenity to residential. The houses here are included within Objective 'RS' while the lands surrounding are included within the High Amenity zoning objective. The lands are also included within Howth SAAO, under which it is an objective to protect the beauty and distinctive natural character of the area. The SAAO also identifies this land as containing 'groups of mature trees in gardens', which is governed by Objective 2.6 and Policy 2.6.1 of the SAAO. The HA zoning is considered appropriate given the highly visible and sensitive nature of the landscape in this area, notwithstanding the applicants submission in relation to the location of trees on the site. It should be noted that the HA zoning does not prohibit a reasonable extension to the existing dwelling, subject to a full planning assessment in relation to visual impact, impact on the landscape and other planning considerations. A change in zoning would be contrary to the objectives and policies of the SAAO and is unwarranted in this instance.

### Density Restrictions

The submission requesting an amendment to the density cap at Old Carrickbrack Road, Howth is noted, with the submission seeking to amend the local objective to provide for residential development at a density of 2 units per ha in place of the existing density restriction of 1 unit per ha. The site in question measures 0.7ha and the applicant cannot therefore develop 1 house, as the site area falls below the 1 ha threshold. The site is also located within the Howth SAAO. Under the SAAO Map A, part of the site is identified as 'land used for agriculture or forestry' and Map B identifies a development restriction of 1 dwelling unit per hectare, which is reinforced on the relevant Development Plan zoning maps. The proposed amendment would constitute a material amendment to the Howth SAAO, which is a Ministerial Order. It is therefore recommended that there is no change to this density restriction at Old Carrickbrack Road.

Another submission requested that an infill dwelling be permitted in the rear garden of an existing dwelling at St Fintan's Road in Sutton, which is also included within the Howth SAAO boundary. It is submitted that the Howth SAAO should not apply to these lands and requests a reassessment of the Howth SAAO boundaries. The subject site is located within the SAAO, within the identified residential area, which is subject to a density restriction of 5 dwellings per hectare. An amendment of the density restriction would constitute a material amendment to the SAAO,

## PART TWO

---

which was adopted by Ministerial Order. It is therefore recommended that there is no change to this density restriction at this location.

One submission received recommended that a new Local Objective be included at The Summit, Howth, which would specifically relate to lands at Windgate Rise, Howth and the surrounding area stating: *'That the density permissible for infilled singular development be per the prevailing density set out on Map A of the SAAO and compatible with existing site areas of developments within the 200 metre radius of the Summit Village.'*

The submission requests that the density restrictions outlined on the relevant Development Plan maps should be compatible with the relevant SAAO Map A. The allowable densities are consistent, where shown. Where not indicated, densities revert to the SAAO map. No change is necessary.

It is not considered necessary to insert a new Local Objective and it is considered preferable to update Sheet 10 to correlate with the SAAO Map A. It is recommended therefore that Sheet 10 of the Draft Plan be amended to include the appropriate density restriction of 5 units per hectare.

It should also be noted that a 5 year Operation Plan is being drafted for Howth SAAO. This Plan is at the Appropriate Assessment stage at present and will be on display shortly.

### Rezoning to Town Centre (TC)

One submission requests an extension to the existing 'TC' (Town and District Centre) zoning at Sutton Cross to include the lands at 16 Howth Road, which forms part of the Musgraves / Supervalu landholding at this location.

No. 16 Howth Road is a residential dwelling, set back in line with the other residential properties along this stretch of the Howth Road and is visually separate from the adjacent commercial development at Sutton Cross (and relevant recent planning permission Ref: F15A/0195, which is currently on appeal to An Bord Pleanála). It is considered that this building at No. 16 acts as an important buffer to clearly demarcate the residential and town centre development area. It is therefore not recommended that these lands be rezoned for inclusion within the 'TC' zoning objective and remain zoned Objective 'RS'.

### Local Objectives/Specific Objectives

One submission requests the removal of Local Objective 98 which applies to lands at Santa Sabina in Sutton. Local Objective 98 states: *'Ensure no development in excess of 3 storeys'*. It is submitted that the inclusion of this Objective undermines the viability of developing these lands at Santa Sabina and conflicts with the objectives of maintaining densities and ensuring quality of design.

The lands in this area are zoned 'CI' (Community Infrastructure) and 'RS' (Residential). It is considered that there is merit in removing this objective to restrict the height of development to 3 storeys. The development potential of the site will be assessed against relevant planning policies and objectives for the area and any proposal for development can be addressed under the development management process. There is currently a planning application on appeal for residential development at this location (Reg Ref: F15A/0303), It is recommended, therefore, that Local Objective 98 be removed from the lands at Santa Sabina.

Another submission received requested that Local Objective 527 be reinstated at the former EDROS site at Balscadden Road in Howth or that the new Local Objective 100 be amended / re-

## PART TWO

---

worded. Local Objective 527 states: *'Allow for a development of up to 3 storeys, the design and mix of uses therein shall be appropriate to this visually sensitive edge of town centre location.'*

Local Objective 100 in the Draft Plan currently reads as: *'Ensure the layout, scale, height and design respects the high amenity status of the surrounding area, the Martello Tower and the village character.'*

It is considered that the development potential of these lands will be assessed against relevant planning policies and objectives for the area, including Local Objective 100. There is no requirement for a specific local objective to allow for three storeys of development as the majority of the lands in question are zoned for town centre use (Objective TC) and any application for development will be assessed under the development management process. It is recommended that Local Objective 527 is not re-instated and there is no requirement to amend the wording of Local Objective 100.

### Community and Open Space / Parks Issues

Submissions relating to the lands at Brickfields are noted. These lands are zoned as Open Space and form part of wider open space lands at Seagrang Park. It is considered that the existing 'OS' zoning is appropriate for this site given the adjoining 'OS' land use and it is recommended that the lands remain in public amenity use. It is not considered necessary to attach a specific local objective relating to Baldoyle Boxing Club. 'Community Facility' and 'Recreational Facility / Sports Club' are both permitted in principle within the 'OS' zoning of these lands.

The submission received regarding the use of Tucketts Lane Park for open space purposes is noted. The lands are zoned for residential development (Objective 'RS') in the current Development Plan (FDP 2011-2017) and this zoning designation remains in the Draft Plan. Any future development of these lands will be guided by the development plan zoning, the surrounding land use and the relevant planning policies and objectives applicable to the area.

### Commercial

One submission received requests that lands at Kilbarrack be rezoned from 'GE' (General Employment) to 'ME' (Metro Economic Corridor or a similar zoning), as the lands are located beside major rail infrastructure at Howth Junction. This submission also requests the preparation of a Masterplan and recommends a limit of 20,000 sq m m of net retail development be permitted on these lands.

These lands are currently occupied by a large car sales showroom and forecourt area (Denis Mahony Motor Group), which is located close to Howth Junction DART Station and forms part of Kilbarrack Industrial Estate. Baldoyle Industrial Estate adjoins the subject lands and these two areas form a significant, dedicated employment base in this area. The lands are not located close to the proposed Metro Corridor. The site is currently included within Objective 'GE', which permits a wide range of uses

Local Objective 94 is also located on the subject lands and seeks to *'promote the improvement of access to Howth Junction Rail Station.'*

Notwithstanding the proximity of the DART Station, it is considered that the existing 'GE' zoning is appropriate for the existing site and surrounding industrial land uses. It is considered that the future development of this area will be guided by Objective BALDOYLE 2, which states the following:

# PART TWO

---

*'Prepare an Urban Framework Plan for Baldoyle Industrial Estate and Kilbarrack Industrial Estate to guide and inform future development including improvements to signage and physical appearance, provision for intensification of employment, and facilitate improvements to pedestrian access to and from Howth Junction Station and associated bus stops which can be implemented over the lifetime of the Plan.'*

## **Recommendations**

### **CE SH 10.1:**

Remove Local Objective 98: *'Ensure no development in excess of 3 storeys'*.

# PART TWO

## Sheet 11 Fingal South

### Submissions Received Relevant to this Sheet

D00031 D00059 D00227 D00234 D00331 D00408 D00409 D00411 D00474 D00490 D00514  
D00515 D00522 D00524 D00526 D00528 D00536 D00556 D00559 D00566 D00578 D00600  
D00609 D00610 D00634 D00676 D00683 D00693 D00699 D00705 D00753 D00755 D00768

(Please see appendices for map based changes).

### Summary of Issues

#### **Rezoning to Residential**

Three submissions were received seeking a change in zoning to residential at Cloghran (from GB to RC), Santry (from OS to RS) and Dardistown (from GE to RS). These are:

A submission at Baskin Lane / Stockhole Junction, Cloghran seeks lands to be rezoned from 'GB' to 'RC', where RC is a rural cluster.

A submission from Trinity College Dublin requests a change in zoning from OS to RS relating to lands at Santry Avenue for student accommodation with the following local objective: *'Preparation of a Masterplan to facilitate the provision of a purpose built student accommodation facility in an appropriately landscaped setting to preserve the predominantly open space character.'*

A submission requests the provision of 4 no. dwellings on the subject lands, RS currently zoned GE-General Employment at Derryolam, Dardistown, Cloghran.

#### **Rezoning to Commercial**

A number of submissions seek the rezoning of lands to other uses namely, General Employment (GE), High Technology (HT), and Metro Economic Corridor (ME) and Dublin Airport (DA).

A submission seeks that lands on the Old Swords Road, Cloghran, be rezoned from Objective 'OS' to Objective 'GE' at Whitehall Colmcille GAA Club.

A submission requests that lands at Cloghran, on the west side of the R132, opposite the national show centre be rezoned from GB to GE to facilitate the move of a landscaping business.

A submission for lands at Glebe, Cloghran, seek the rezoning of 1 ha from GB to GE.

A substantial submission has been made in relation to lands at Cloghran, seeks the rezoning of 146 ha from GB to a mixture of zonings e.g. GE/ME/HT with a local objective to reflect the importance of an integrated approach to development at this location. The submission also states that land could also include sports/recreational facilities within a high quality parkland setting, with a green energy solar farm on lands which are affected by the flight path. The submission states that all lands are in single ownership and the submission is accompanied with a detailed report which include the following: access and transportation; servicing of the lands; flood risk assessment; Dublin Airport LAP 2006; Clongriffin - Belmayne LAP 2012-2018; Airport safety zones together with a notional phasing plan.

A submission relating to an hotel site on the Old Airport Road, Cloghran, seeks a rezoning from GE to ME.

# PART TWO

---

A submission relating to GB zoned lands at Dunsoghly, to west of Dublin Airport (partially located on Sheet 11 but not mapped) seek lands to be zoned or identified for future development to make optimal use of the lands adjacent to Dublin Airport and to extend the Airport LAP to include land to the west of the Airport and appropriately zone same to facilitate and promote future development adjacent to and west of Dublin Airport in the medium to long term.

The DAA submission seeks a rezoning from GE to DA to include parking facilities (blue and red car-parks) resulting with an enlarged development boundary to Dublin Airport that would creep south of the established southern extents of the current airport box.

## **Retail rezonings**

There are two rezonings sought for Town Centre and Local Centre zoning objectives at Ballymun Road and Charlestown respectively is sought.

A submission relating to lands, at the Old Ballymun Road, Santry within the Masterplan lands MP11A, seeks a rezoning from ME to LC to allow for the development of a supermarket in accordance with footnote 26 of the zoning matrix.

A submission seeks to rezone GE to TC for the purposes of residential development with supporting text to Objective CHARLESTOWN AND MEAKSTOWN 1 of chapter 4 which would state: 'Develop an enhanced community identity within Fingal through the improvement of residential amenities and the promotion of mixed uses, including residential, in Charlestown Centre. *In particular, the development of the TC lands to the south of Charlestown place for residential use will be supported.*'

## **Other Rezonings**

A submission to rezone ME lands to OS between Ballymun and the M50 (immediately east of Musgrave) is sought by Ballymun Kickhams Club.

## **Map Based Local Objectives**

Submission seeks clarity on the underpass, Objective 80.

The submission from Dublin City Council seeks the retention of the current local objective no. 448 and Retail Objective No. 31 for local retail in Northwood to support and reinforce the Level 4, Neighbourhood Centre guidance and designation as set out in the RSGDA. The town centre of Ballymun has 'shopping redevelopment potential' (Retail Strategy for the GDA 2008) and is defined as a Level 3 District Centre. Due to high retail expenditure leakage in Ballymun, a key recommendation by Dublin City Council is the opening of another food store along Main Street in Ballymun, to assist the continued build out of Main Street and the creation of a 'heart/focal point' to Ballymun which has been lost with the demise of the Shopping Centre.

The DAA submission seeks to amend the wording of Map Based LO 57.

A submission on lands to the south of Dublin Airport requests the following objective be included on the Dardistown Masterplan [11D] lands at as follows: '*Following the finalisation of the line of the Metro North, the possibility of providing a degree of residential use in any mixed use development in the vicinity of the Metro Station to be considered. Such residential use to be built with the highest standards of insulation and environmental protection.*'

# PART TWO

---

A submission relating to an hotel site on the Old Airport Road, Cloghran, seeks a reinstatement of a local objective 416 which states: *'Permit a hotel/conference centre subject to compliance with the recommendations of the ERM Report on Public Safety Zones.'*

A submission from a car parking provider at Dublin Airport, Old Airport Road, Cloghran, seeks to have the CP Car Park Designation currently shown on the subject lands under the current Development Plan 2011-2017 reinstated under the Draft Development Plan.

A submission requests that all such appropriate airport-related objectives should be indicated on the zoning maps.

## **Masterplan and LAP Boundaries**

The submission also seeks the removal of the subject land from the Masterplan lands or to put specific objective on the site as follows: *'The lands between the R108 and the Old Ballymun Road shall be allowed to bring forward proposals for development in advance of the preparation of a Masterplan for the area (11.a), and applications will not be dependent upon the preparation and agreement of a Masterplan or prepare the Masterplan for the area without any further delay, after the making of the Development Plan and within the first year of the new Plan.'*

A submission seeks the removal of LAP 11.B and replace with a Masterplan or Framework Plan for the subject lands instead.

A submission that includes lands northeast of M1/M50 roundabout, within the Clonsaugh Masterplan MP11C (not mapped on sheet 11) to be removed from the boundary of the Masterplan as differing timescales of development will apply to the lands.

Submission seeks to have lands removed from the Masterplan MP 11.B area on basis that only the rural zoned areas that have been rezoned to ME in this general location, under this Draft Development plan would benefit from a Masterplan process with respect to transportation issues and servicing matters as the subject lands have obtained a series of planning permissions from the Council to date.

## **Transport**

Submission raises concerns regarding the direct and indirect impact of Dublin Airport and in particular the new runway and associated road are going to have on the quality of lives of residents in the rural community of St. Margarets, Kilreesk Lane and Millhead during both construction and operation. General feeling that the area has been neglected, overgrown hedges on the roads, constant fly tipping, no new infrastructure and where families are forced to move away as no new house building. Airport appears to have a stranglehold over the area. St Margarets not given recognition as Rivermeade, Ballyboughal, Rowlestown and others, suggesting no future for St Margaret's or its community. St Margarets, Kilreesk lane and Millhead area spread over 3 separate map sheets so unclear how severe the impact on "indicative roads" will have; there for very difficult to put forward an educated observation.

St Margaret's Concerned Res Group Want St Margaret's and surrounds visible on one complete map - not 3 different maps at different scales to view full area and surrounds. Full impact of roads and runway cannot be envisaged on separate maps. Will Airport Buffer Zone be maintained as a priority in Dev Plan?

Submission raises concerns regarding information on the new roads in the area once the runway is built and that condition no.3d of planning permission F04A/1755 will be adhered to.

# PART TWO

---

## **Other Issues related to the development of lands on sheet 11**

A submission relating to the Clayton Hotel (formerly Bewleys), Stockhole Lane, Clonsbaugh seeks a new zoning objective to support and facilitate the development of hotel and other tourist accommodation uses, having regard to section 6.9 and related policies/objectives for hotels. Alternatively, modify other relevant zoning objectives to identify a Hotel as a 'Permitted In Principle' use.

A submission relating to existing uses located on DA zoned land, mapped to sheet 11, seeks amendment to zoning objective 'DA', Dublin Airport, to allow for Waste Disposal & Recovery Facility (High Impact) to be a permitted use or to insert a proviso to this 'DA' zoning objective to allow for the continuation / expansion of existing non-conforming uses within the DA zoning Objective.

A submission relating to land in Dubber, seeks to amend GE land use zoning objective to permit in principle, or 'open for consideration, the use of boarding kennels within the GE land-use zoning.

Submission expresses concern at increased noise and pollution in the general area resulting from additional warehousing and industrial units.

Submission raises concerns regarding condition no.3d of planning permission F04A/1755 and will the hours of operation be adhered to.

A submission relating to Dardistown cemetery, mapped to sheet 11, seeks an additional objective which supports the ancillary uses and facilities at existing large scale cemeteries and crematoria (including monument and florist services) and secondly the submission seeks a more restrictive approach to permitting non-conforming land uses particularly where such uses are located in proximity to strategically located GE zoned lands.

The River Valley and Rathingle estate have concerns regarding the new runway and noise levels air pollution as a number of residents have reported a smell of diesel/paraffin from time to time. Objective DA06 relating to participation in the Dublin Airport Stakeholders Forum has not been adhered to.

A submission relating to lands at Dardistown concerning 85ha of zoned lands, it seeks to amend objectives DA05, DA12, DA14, MT13, DMS129 and proposes three new objectives all relating to delivery of airport related infrastructure mainly prescribing a timescale.

A submission promotes the development of the western campus on DA zoned lands to be pursued and supports the content of the Dublin Airport LAP 2006, which expired recently, which is sought to be protected.

Three submissions on GE zoned lands sought a change to the uses permitted under this zoning relating to waste facilities.

## **Chief Executive's Response**

### **Rezoning to Residential**

*Rezoning from GB lands to RC*

There are currently thirty four existing Rural Clusters within the Draft Plan to cater for rural generated housing need. These Rural Clusters have a strong residential focus and are based on a small number of individual houses and typically take the form of between 5 and 15 dwellings.

## PART TWO

---

They provide an alternative to one-off housing in the countryside through the consolidation of rural residential development within existing small clusters. For the most part, they will provide an opportunity for family members of existing households within the cluster to build a new home, or reuse and adapt an existing structure, in proximity to their family home, by subdividing large sites.

A large number of submissions seek to rezone RU/RB/GB/HA lands to RC at the following locations across the County; Adamstown, Ballymadun, Ballough-Lusk, Balcarrick-Donabate, Balcarrick-Corballis, Baskin Lane/Stockhole Junction, Blackhills, Burrow-Portrane, Brownstown-Swords, Colecott, Collinstown Lane, Corduff, Curragh West, Feltrim-Malahide, Greatcommons-Lusk, Grougha, Hedgestown, Kilsallaghan, Magillstown-Swords, Middlefield-Portrane, Newpark-The Ward and Wimbletown.

The majority of these proposals are new RC's with the remainder proposing extensions to existing RC's across the County. The Council considers there is no merit in rezoning new RC's or large scale extensions to existing RC's within the County based on the rationale set out in this CE Report. The Council, will, however, consider small scale incremental additions to existing clusters to facilitate rural generated housing need. Proposals for both new RC's and extensions to existing RC's will be discussed in detail on the relevant sheets in this CE Report. One submission relevant to this Sheet 11 seeks to rezone GB zoned lands to RC at Baskin Lane/Stockhole Junction. Baskin Lane/Stockhole Junction is a proposed new RC of c. 0.98 hectares (2.42 acres) east of the M1, located within the strategic greenbelt that surrounds the airport straddling the Fingal coast to County Meath. (The submission proposes 10 additional houses on these lands.) Notwithstanding the existing services in the area, the change in zoning of these lands as a designated new Rural Cluster would represent a piecemeal uncoordinated rezoning of lands for which there is no evidence based need. These lands lie in close proximity to large settlements, e.g. Swords, where residential zoned lands exist.

The Ministerial Planning Guidelines on Development Plans, issued under Section 28 of the Planning and Development Act 2000, as amended state "zoning that is not responsive to or justifiable by reference to reasonable needs, or that substantially exceeds such needs, is not consistent with proper planning and sustainable development." The Guidelines also make clear that in order to support public confidence in the planning system and the development plan, decisions to zone land must be clearly justified on the basis of established need and must support the aims and strategy of the plan taking the following specific matters into account:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage policy, including conservation of habitats and other sensitive areas.

The zoning of these lands cannot be justified on the matters outlined above. These submissions propose residential development beyond existing RC zoning, while RC zoned lands remain undeveloped and are sufficient in area to accommodate local rural based housing need across the County. There is significant provision available within the large urban settlement of Swords. Such a development pattern would result in deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and the loss of agricultural and green belt lands. The quantum and location of zoned land in the County is

## PART TWO

---

directly influenced by the Development Plan's Settlement and Core Strategy. The Planning and Development (Amendment) Act 2010 introduced the requirement for an evidence based 'Core Strategy' to be provided in Development Plans.

The Core Strategy identifies the quantum and location of development for the plan period that is consistent with the regionally defined population targets and settlement hierarchy, and, which reflects the availability of existing services, planned investment, sequential development and environmental requirements. The Core Strategy sets out the specific population targets and housing requirements across the County and the elements of the settlement hierarchy thereby act as a clear framework for amendments to existing zonings. The Core Strategy must demonstrate that the development objectives in the Development Plan are consistent with the National Spatial Strategy and Regional Planning Guidelines.

Government policy as articulated by the National Spatial Strategy and the Sustainable Rural Housing: Guidelines for Planning Authorities of April 2005, classifies the rural area of Fingal as "an area under strong urban influence" where the housing requirements of the rural community should be facilitated but urban generated housing should be directed to areas zoned for residential development in cities, towns and villages.

The approach is reflected in the Regional Planning Guidelines for the Greater Dublin Area. The inclusion in the Draft Plan of zoning objectives facilitating the provision of additional housing without due regard to the Core Strategy and its approach is contrary to the national and regional direction. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period.

This strategic Greenbelt is one of the most critical in the County safeguarding the innate value of the Fingal countryside from unsustainable settlement patterns. Any encroachment into this strategic Greenbelt area would result in coalescence and the loss of definition between urban and rural areas. The Council is fully committed to the continued protection of the Greenbelt and to allow for any additional housing in this area would seriously undermine the long standing Greenbelt policy of the Council and would be contrary to the zoning objective and vision to protect Greenbelt lands as set out in the Draft Plan and as such is contrary to proper planning and sustainable development of the area.

Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear, that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period. In conclusion, there is no evidence based need or planning rationale for the proposed zoning of new rural clusters which would be in breach of the Core Strategy of both the FDP 2011-2017, the Draft Plan 2017-2023 and the Regional Planning Guidelines 2010-2022 and as such would be contrary to proper planning and sustainable development of the area.

Objective 477 of the 2011 – 2017 Development plan, which states:

*'A masterplan will be prepared that will provide for the protection of trees along the southern and eastern boundaries, limited frontage development for staff/student accommodation, sports facilities, academic and administrative facilities, with not less than 75% of the lands kept in an open character.'*, was removed in the Draft Development Plan 2017 - 2023. It is considered reasonable to facilitate additional student accommodation contiguous to that which exists on an adjoining site, on part of the subject lands. To facilitate student accommodation a residential zoning is recommended

## PART TWO

for a portion of this site with an attached objective identifying student accommodation as the use associated with this parcel of land.

One of the key economic strengths and opportunities identified in Chapter 1 Strategic context is the Employment lands, where it states: *'Fingal has an optimum quantum of employment zoned lands provided at appropriate locations throughout the County. A wide variety of zonings are provided for to cater for employment opportunities across economic sectors through high technology, general enterprise and employment, food industry, heavy industry, mixed use employment, rural related business, retail warehousing, warehousing and distribution and airport related development.'* The zoning objective GE, General Employment, is to *'Provide opportunities for general enterprise and employment'*. The large bank of GE zoned lands, south of the airport, is strategic in nature and purposefully located in close proximity to the airport and surrounding road network to facilitate opportunities for compatible industry and general employment uses, logistics and warehousing activity in a good quality physical environment in areas that are highly accessible, well designed, permeable and legible.

Residential is not permitted under a GE zoning on the basis that such a use is not considered compatible with GE uses. Sufficient residential zoned land has been provided for the county under the core strategy, informed by an evidence based assessment of the needs of the county to facilitate growth. The subject site is also located within the inner noise airport zone and inside the outer public safety zone.

### **Rezoning to Commercial**

*The purpose of zoning objective OS, Open Space, is to 'reserve and provide for open space and recreational amenities.' The underlying vision is to: 'Provide recreational and amenity resources for urban and rural populations subject to strict development controls. Only community facilities and other recreational uses will be considered and encouraged by the Planning Authority.'* The OS zoning objective, which applies to this site is considered the most appropriate zoning at this location for the existing established uses. The quantum of GE lands zoned, has been quantified for the purposes of ensuring adequate supply of such land for the period of the development plan and beyond. There is no evidenced-based need for additional GE lands at this time.

The quantum of GE lands zoned, in this Draft Development Plan, has been quantified for the purposes of ensuring adequate supply of such land for the period of the development plan and beyond.

There is no evidenced-based need for additional GE lands at this time. The zoning objective, GB, seeks to, *'Protect and provide for a Greenbelt'*. The Council remains fully committed to the continued protection of the Greenbelt, specifically the strategic greenbelt area that surrounds the airport on three sides running from the Fingal coast to County Meath that includes this site. Uses not identified in the permitted in principle or not permitted categories associated with the GB zoning objective will be assessed in terms of their contribution towards the achievement of the zoning objective and vision and their compliance and consistency with the policies and objectives of the development plan. It should be noted that this strategic greenbelt area surrounds the airport and any future development will be assessed in this context.

The quantum of existing undeveloped GE zoned lands currently available for development across the County is c.1218 Ha's. These GE zoned lands are located at highly accessible locations close to the motorway and national road network off the M50 and M1 corridors. The M50 corridor alone has an available and accessible landbank of c.399 ha's. [985 acres] of undeveloped GE zoned lands. These figures represent a substantial provision of GE zoned

## PART TWO

lands readily available for development. As such there is no need for additional GE zoned lands. The Greenbelt objective seeks to, 'Protect and provide for a Greenbelt'. The Council is fully committed to the continued protection of the Greenbelt, specifically the strategic greenbelt area that surrounds the airport on three sides running from the Fingal coast to County Meath that includes this site. One of the key aims of the development plan is to *'ensure an adequate supply of zoned lands to meet forecasted and anticipated economic and social needs, while avoiding an oversupply which would lead to fragmented development, dissipated infrastructural provision and urban sprawl.'* As provided for in chapter 6, Economic Development, there is a total of 1829 ha of general employment (GE) zoned lands, 690 ha of High Technology (HT) and 390 ha of ME (Metro Economic Corridor). The availability of undeveloped GE, ME and HT zoned lands within the Draft plan is sufficient, appropriately located and will facilitate Fingal's future development needs. There is no evidenced based need for additional lands of this type at this location at this time. The GB lands of the submission are located within the strategic greenbelt that surrounds the airport, from the Fingal coast to County Meath. The pattern of development has seen very little change within this strategic green belt area over the last number of years. This strategic greenbelt purposefully encloses the airport box. Fingal County Council remains fully committed to its continued protection.

The change of use from GE to ME at this location is not considered appropriate as the ME (Metro Economic Corridor) zoning follows the alignment of the indicative Metro route, generally outside the inner airport noise zone, as this zoning permits high density residential development. This submission site is at some distance from the indicative New Metro route and falls within the inner airport noise zone which is not considered compatible with residential uses. The current and proposed land use zoning on the site remains the same, that of GE, General Employment. While it is noted that the hotel, as permitted by Fingal County Council, would be considered as a non-conforming use, under GE zoning, Objective Z05 of the Draft Development plan, which states:

*'Generally, permitted reasonable intensification of, extensions to and improvement of premises accommodating non-conforming uses, subject to normal planning criteria.'*, provides an objective against which the Council may wish to consider further planning applications.

One of the key aims of the Draft Fingal Development Plan is to *'ensure an adequate supply of zoned lands to meet forecasted and anticipated economic and social needs, while avoiding an oversupply which would lead to fragmented development, dissipated infrastructural provision and urban sprawl.'* The Draft Development Plan adequately addresses the supply of lands required for future needs including the airport. There is no current need to include additional land for the period of this plan. There is no evidence based need that has arisen where the airport LAP extents would be required to be expanded at this time. The current lands enclosed by the DA zoning incorporates the expected future western campus to facilitate any future third terminal.

The airport lands are zoned DA, Dublin Airport, where the objective is to: *'Ensure the efficient and effective operation and development of the airport in accordance with an approved Local Area Plan. ; where the vision is to: 'Facilitate air transport infrastructure and airport related activity/uses only (i.e. those uses that need to be located at or near the airport). All development within the Airport Area should be of a high standard reflecting the status of an international airport and its role as a gateway to the country and region. Minor extensions or alterations to existing properties located within the Airport Area which are not essential to the operational efficiency and amenity of the airport may be permitted, where it can be demonstrated that these works will not result in material intensification of land use. Air Transport Infrastructure includes: aircraft areas, air traffic control/tower, ancillary health, safety and security uses, aprons, cargo handling, maintenance hangers, meteorology, retail - airside/duty free, runways, taxiways, terminals and piers.*

# PART TWO

---

The extent of the Airport Box that encloses the DA zoning objective has changed little over a number of plan periods with the R108 and Old Airport Road acting as the established line along its southern extents. Any change to this would require a strong, evidence based planning rationale to effect any change to the extents of this unique zoning objective. It is considered that there is adequate available DA zoned lands to facilitate airport development currently. The extent and location of car parking facilities has always been predicated on the expected public transport improvements at the airport which would bring a suite of knock on positive effects to the area but ultimately reducing reliance on car-parking and therefore reduce the need for the provision of car-parking facilities.

This position has not changed since the 2006 Dublin Airport LAP, where many objectives set out the approach taken to the car-parking matters, such as CP9 which states: *'To control the supply of car parking at the airport so as to maximise as far as is practicable the use of public transport by workers and passengers and to secure the efficient use of land.'* Fingal County Council has always granted planning permission for car parking uses to the DAA since 1997. While Metro North, outlined under the Government programme Transport 21, has not been implemented by Government owing to the financial crash, the intention remains to serve Dublin Airport with a public transport system.

The new Metro North is contained in the capital investment programme. This will increase the volume of passengers and employees travelling to the airport by a public transport mode and will serve to reduce the demand for long term, short term and employee car parking spaces at Dublin airport.

Therefore in giving consideration to an additional, fragmented and piecemeal designation of DA lands, south of the established southern perimeter, for an ancillary (car parking) use that is planned to be to be reduced overtime, in the interest of sustainable land uses, promotion of public transport, consequent reduction in carbon emissions with positive knock on effects on the capacity of the surrounding road network, it is concluded that the proposed rezoning from GE to DA is not warranted. However, the Council have considered the use of the CP (car park) designation and will recommend the inclusion of 2 no. CP designations at the two parking facilities in the ownership of the DAA, (identified in submission no. D00578) known as the blue and red car-park. This recommendation will display under heading Map Based Objectives.

## **Retail rezonings**

The Fingal Retail Hierarchy has been devised having regard to the classifications of the Retail Strategy for the GDA and through ensuring consistency with the settlement hierarchy of the RPGs for the GDA. The Fingal Retail Hierarchy includes a categorisation of urban centres within the County into retailing levels, identifies the locations of each level, and the type of retail format that is considered appropriate for each level of the hierarchy.

There is no evidenced based justification for a change to the retail status as set out in the Draft Development Plan in chapter 6, Economic Development, other than to seek a change to a zoning objective from ME to LC to allow a supermarket of a certain size that requires a level 4 retail classification. ME is the zoning objective associated with the Metro Economic Corridor and will *'facilitate opportunities for high density mixed use employment generating activity and commercial development, and support the provision of an appropriate quantum of residential development within the Metro Economic Corridor'*

# PART TWO

Given the proximity of the subject site to the general area of the new Metro Route and the requirement to ensure that the ME vision can be achieved, there is no substantial planning rationale to change the zoning. (It should be noted that a retail supermarket of  $\leq 2500$  sqm nfa is a permitted in principle use within ME zoned lands.)

The re-zoning proposal for Charlestown specifically seeks the use of a TC, Town Centre, zoning at this location for residential uses. This is considered a misuse of the zoning objective. It would increase the size of a TC designation and diminish the extents of GE zoning in the general area. In chapter 4 Urban Fingal, the Development Strategy for Charlestown and Meakstown recognises the industrial areas surrounding the Charlestown and Meakstown as it states: *'Consolidate the development of both Charlestown and Meakstown in a coordinated manner, promoting and enhancing the role of the Charlestown Centre as a focal point of the community, while improving integration and linkages with Finglas and neighbouring industrial areas.'*

The parcel of land, proposed to be rezoned from GE to TC, would diminish the integration of the GE zonings by reducing the apron like 'gateway' entrance that the plan envisages at this location, which transitions from GE to TC, particularly where the TC objective would be of a residential nature.

## Other Rezoning

ME zoned lands in the Draft Development Plan are the Metro Economic Corridor which seeks high density development to justify exchequer investment in strategic public transport investment. The New Metro North Route, identified within the Government's capital investment programme, runs by this section of ME lands identified in the submission. The Council's approach to zoning, in the general area of the proposed location to relocate the club, with respect to the route corridor for new rail infrastructure has remained consistent since 2005, where Map no. SF1 includes the Metro Proposal running along this route, where the zoning reflects the high economic value of the proposed public transport corridor.

While the Draft Development Plan supports the use of recreational facilities for multi-users, it seeks to resist the exclusive use of facilities by one group (objective PM 53).

Under Chapter 4, Urban Fingal, Charlestown and Meakstown Development Plan objectives includes the following: Objective Charlestown and Meakstown 2: *'Continue to improve and deliver enhanced community and recreation amenities to the area with particular emphasis on a community centre to provide for the community and sporting needs of the area including the provision of changing rooms if required and improvements to the quality of open space.'*[Emphasis added.] and Objective Charlestown and Meakstown 3, which provides for: *'Continue to support and facilitate the established cross boundary forum, which includes Dublin City Council, to co-ordinate Development between Dublin City's North West Area (which includes parts of Santry, Poppintree and Ballymun) and the adjoining areas in Fingal which include Santry, Meakstown and Charlestown and lands to the north of Ballymun.'*

It is considered the existing objectives contained within the Draft Plan can appropriately meet the recreational needs of the area.

## Map Based Local Objectives

The location of the underpass of the R108 Ballymun Road will be subject to review as part of the design of new Metro North.

## PART TWO

---

ME zonings seeks to facilitate opportunities for high density mixed use employment generating activity and commercial development, and support the provision of an appropriate quantum of residential development within the Metro Economic Corridor. In this regard the ME zoning allows for comparison retailing of  $\leq 500$  sqm nfa, retail-local  $<150$  sqm nfa and retail-supermarket  $\leq 2,500$  nfa. Accordingly the inclusion of LO 448 and retail objective 31 from the current Development Plan in the ME zone would be contrary to the underlining zoning objective for the area.

This general area, lands due south of airport are strategically placed for employment generating and high technology, centered on a transport hub that may in the future see the inclusion of Metro west. The Dardistown LAP, 2013 has set the overarching strategy for this location with uses that will serve such a proposed transport hub with transport depot etc. and masterplan 11D will seek to co-ordinate the design of these uses. There is ample residential lands south of this location on ME lands that will serve a residential need at high density.

Local objective 416 of the current development plan relating to hotel development is considered redundant as an hotel has been built out on the site.

The subject site falls within the Dardistown LAP lands, adopted 2013, which lies due south of the Airport DA zoned lands. These lands that will facilitate the new Metro North rail corridor and ancillary uses, including a depot.

The LAP identifies the subject site on lands labelled *Airport and Logistics Park* where commercial parking is identified as a potential use on these lands.

It is recommended the use of the CP (car park) designation and will recommend the reinstatement at the Quick Park site (submission no. D00683).

All relevant objectives associated with the airport are identified on sheet 11, specifically the LAP and Masterplan designations that are located on the DA zoning objective covering the airport box.

### **Masterplan and LAP Boundaries**

This site in the context of the Masterplan lands MP 11A has been given consideration. Having regard to the existing permission for development which is in place in respect of the site, it is recommended that the Masterplan MP 11A area be revised to exclude this site.

The area of land identified for inclusion within LAP 11.B is considered a significant LAP for the general area that encompasses a swathe of ME zoned lands in close proximity to the airport where it is considered that the statutory process of an LAP would best serve these important bank of lands rather than any other planning tool.

The extents of the Masterplan 11A incorporates a number of important road proposals for the area which is considered a significant planning issue given that the juncture of the M1/M50 interchange is within close proximity. This critical piece of transport infrastructure together with the type of zoning objective i.e. HT high technology requires the co-ordinated and orderly development of this parcel of high visual land over time with the appropriate transport linkages in place to serve the envisaged development.

# PART TWO

---

This site in the context of the Masterplan lands MP 11B has been given consideration and it is recommended to redraw the Masterplan MP 11B area to exclude this site relating to submission no. D00514.

The submission in relation to Masterplan MP11.C at Clonshagh, is not mapped but it is clear from the development description and the information submitted where the lands are. Given the different time frames for development and the existing ongoing process regarding the subject lands it is considered appropriate MP11.C is divided into two Masterplan areas. These can be divided by Stockhole Lane and a new Masterplan created.

## **Transport**

The issues relating to St Margaret's are noted. Fingal County Council is a large geographic area and when converted to maps will cause severance between areas. This occurs between all sheets of maps for all areas.

Sheet 11 identifies St Margaret's as a 'special study area' owing to its proximity to Dublin Airport. The relationship between St Margaret's and the airport is long standing with both uses, primarily residential and airport related uses, well established. The Council seek to facilitate a balance to both long standing land uses in this general area. The Council have, where possible, also facilitated other land uses in the general area that would be considered non conforming uses with respect to the uses permitted under the DA zoning and greenbelt zoned lands in the vicinity of St Margaret's.

Compliance matters with conditions attaching to the planning permission associated with the new runway are an issue for development management and the enforcement section of the Council and are not considered under the development plan process.

Overgrown hedging is a matter for the Operations section of the Council.

The issue of new housing in rural and greenbelt zoned lands is set out in the Development Plan. It is accepted that the restrictions are pronounced in areas that are located within the noise, public safety zones and approach routes associated with Dublin airport. However, these restrictions are placed with the interests of future occupants in mind, the amenity required for residential development cannot be provided in tandem with airport development. It is accepted that these uses are not compatible uses. These restrictions affect all land within such airport zones to the north, south, east and not just west of the airport.

The Dublin Airport LAP 2006, which expired in 2015, following an extended plan period, will be reviewed and a new LAP for the airport prepared. It is a priority for the Council. Its preparation will involve public consultation at pre-plan and draft plan stages and thus offer an opportunity to make further comments on issues at a local level.

## **Other Issues related to the development of lands on sheet 11**

All of the above submissions provided mapping and are therefore attached to Sheet 11. However, none of these submissions have sought map based changes. The issues have been distributed to the appropriate chapter of the Draft Development Plan and dealt within the relevant CE's report on that chapter.

The preparation of an LAP for Dublin Airport is a stated objective of the Draft Development Plan and will be a priority for the Council. Development proposals for the western campus will

# PART TWO

---

continue to form part of the next LAP for Dublin airport. A public consultation process will take place where submissions will be considered and appraised by the Council.

## **Recommendation**

### **Rezoning to Residential**

#### **CE SH 11.1:**

To rezone OS to RS at Santry Avenue with a local objective attached stating:

*'Preparation of a Masterplan to facilitate the provision of a purpose built student accommodation facility in an appropriately landscaped setting to preserve the predominantly open space character.'*

### **Map Based Local Objectives**

#### **CE SH 11.2:**

Re-instate the CP (car park) designation at the Quick Park site.

#### **CE SH 11.3:**

It is recommended the inclusion of 2 no. CP (Car Park) designations at the two parking facilities in the ownership of the DAA, known as the blue and red car-park, located on GE lands.

### **Masterplan and LAP Boundaries**

#### **CE SH 11.4:**

Redraw the Masterplan MP 11A area to exclude the site under submission D00526, as mapped to sheet 11.

#### **CE SH 11.5:**

Redraw the Masterplan MP 11B area having regard to submission no. D00514.

#### **CE SH 11.6:**

Divide Masterplan MP 11.C into two Masterplan areas, MP 11.C Clonshagh East and MP11.E Clonshagh West.

# PART TWO

## Sheet 12 Blanchardstown North

### Submissions Received Relevant to this Sheet

D00002, D00012 D00053 D00060 D00328 D00341 D00361 D00417 D00456 D00503 D00506  
D00508 D00543 D00645 D00649 D00652 D00653 D00658 D00716 D00735 D00737

(Please see appendices for map based changes).

### Summary of Issues

#### Rezoning to Residential (RS or RA)

A number of submissions received on Sheet 12 requested the rezoning of lands for residential land use (Objective 'RS' or 'RA'). These lands are currently zoned Objective 'HT' 'OS' and 'GB', and are located at Ballycoolin House, Hollystown and at Kilmartin (north of the LAP lands). One submission was received in support of the change in zoning for the Barnlodge area.

#### Walkways and Cycleways

One submission expresses concerns in relation to the lack of a convenient cycling route between Castleknock and the Royal Canal cycle route. It is indicated that, with the increasing population living in the Phoenix Park Racecourse (Masterplan MP 13.A) there is an opportunity to provide cyclists with convenient and safe access to the Royal canal cycle route. It is proposed that a cyclist friendly bridge and ramp could be provided as part of the "Navan Road Parkway Local Area Plan" (LAP 13.B).

#### Commercial

One submission received requests that lands at Blanchardstown Corporate Park be rezoned from Objective 'GE' to Objective 'HT'. The retention of Local Objective 431 (as set out in the current Development Plan) is also sought.

Another submission requested that lands at Newtown, Kilshane Cross, Dublin 11 be rezoned from Objective 'GB' to 'WD'.

Four submissions requested the rezoning of lands to Objective 'GE' at Broughan, The Ward, Dublin 15 (from 'GB' to 'GE'); at Kilshane Cross (from 'GB' to 'GE'); at Dublin Airport Logistics Park (from 'WD' to 'GE'); and at Damastown Industrial Park (from 'HT' to 'GE').

One submission was received in support of the 'GE' land use zoning at Cherryhound / Kilshane,

#### Rural Village

One submission requested the rezoning of lands from 'GB' to 'RV' at Hollystown.

#### Rezoning to Local Centre

One submission notes that there is a zoning discrepancy at LIDL Tyrrelstown and the submission considers the entire landholding is not appropriately zoned Local Centre, as an area of the car park is excluded.

Another submission requests a change in zoning from 'HA' to 'LC' within Mulhuddart Village, while another submission seeks the rezoning of lands at Hollystown from 'GB' to 'LC'.

# PART TWO

---

## Community Infrastructure

One submission relates to Elmgreen Nursing Home (Dunsink Lane) and expresses a wish to extend their existing facility / operations at this location into an adjacent 5 acre site.

Other submissions received requests that the Specific Objective for a Proposed School to the east of the R121 at Kilmartin LAP lands should be removed from the land use zoning map. The submission received from the Department of Education and Skills notes that they made a submission to the Kilmartin LAP 2012-2018 and as part of the submission, a request was made for the reservation of a site for a primary and a post-primary school based on the proposed population increase. The Department reiterates the need for these site reservations to ensure that the educational needs of the projected increase in population, including primary and post-primary going students, are adequately planned for.

## Masterplan 11B

One submission seeks the removal of Dublin Airport Logistics out of Masterplan lands 11.B.

## **Chief Executive's Response**

### **Rezoning of Lands to Residential Development**

A number of submissions requested the rezoning of lands which are currently zoned 'HT', 'GB' and 'OS' to residential land use zonings (Objective 'RA' or 'RS') to accommodate single or multiple housing proposals.

The *Ministerial Planning Guidelines on Development Plans*, issued under Section 28 of the *Planning and Development Act 2000*, state that '*zoning that is not responsive to or justifiable by reference to reasonable needs, or that substantially exceeds such needs, is not consistent with proper planning and sustainable development.*' The Guidelines also make clear that in order to support public confidence in the planning system and the Development Plan process, decisions to zone land must be clearly justified on the basis of established need and must support the aims and strategy of the plan taking the following specific matters into account:

- Need
- Policy Context
- Capacity of Water, Drainage and Roads Infrastructure
- Supporting Infrastructure and Facilities
- Physical Suitability
- Sequential Approach
- Environmental and Heritage policy, including conservation of habitats and other sensitive areas.

These rezoning submissions seek to allow residential development on lands located within strategic Greenbelt and designated Open Space areas, and lands currently zoned for High Technology use and they cannot be justified based on the specific issues outlined above, whilst significant residential zoned lands (Objective 'RA', 'RS', 'RC' and 'RV') remain undeveloped.

Such a development pattern would result in deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and a poor quality, fragmented rural environment and the erosion of strategic Greenbelt areas.

The Rural Settlement Strategy as set out in the Draft Plan reflects the existing policy in the current Fingal Development Plan 2011-2017. The policy recognises the need to provide for housing for the rural community but limits the amount of housing in the countryside and provides for alternative options within the rural area either in the villages or rural clusters as a

## PART TWO

---

more sustainable and suitable location for rural generated housing. The quantum and location of zoned land in the County is directly influenced by the Development Plan's Settlement and Core Strategy. The *Planning and Development (Amendment) Act 2010* introduced the requirement for an evidence based 'Core Strategy' to be provided in Development Plans. The Core Strategy identifies the quantum and location of development for the plan period that is consistent with the regionally defined population targets and settlement hierarchy, and, which reflects the availability of existing services, planned investment, sequential development and environmental requirements. The Core Strategy sets out the specific population targets and housing requirements across the County and the elements of the settlement hierarchy thereby act as a clear framework for amendments to existing zonings. The Core Strategy must demonstrate that the development objectives in the Development Plan are consistent with the National Spatial Strategy and Regional Planning Guidelines. Based on the evidence-based approach adopted in the Core Strategy for the County, it is clear that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period.

Allowing certain individuals to be excluded from this policy would contradict this overall approach and be contrary to the proper planning and sustainable development of the area. The rezoning of designated 'HT' zoned lands is not considered appropriate. To rezone one section of 'HT' zoned lands for residential use would have significant implications for the adjoining 'HT' zoned lands in the surrounding area. These lands are zoned to provide *for office, research and development and high technology/high technology manufacturing type employment in a high quality built and landscaped environment*. Significant land has been provided for in the Draft Plan for industrial, rural business and commercial land uses and Fingal's Economic Strategy set out in the Draft Plan seeks to attract a range of employment types, across business and industry sectors at the most appropriate and accessible locations within the County, minimising the requirement for undue commuting and improving the quality of life for Fingal's residents. Strategic Policy 10 and Objectives ED02 and ED03 of the Draft Plan seek to promote enterprise and employment throughout the County, particularly in the growth Centres of Swords, Blanchardstown and Balbriggan.

The Greenbelt lands in this area are one of the most critical in the County having regard to the close proximity of each of these areas to one another and the proposed areas to be rezoned lie outside of the designated development boundary of Blanchardstown. Any encroachment into this strategic Greenbelt area would result in coalescence and the loss of definition between urban and rural areas. Furthermore, the Council is fully committed to the continued protection of the Greenbelt and to allow for any additional housing in this area would seriously undermine the long standing Greenbelt policy of the Council and would be contrary to the zoning objective and vision to protect Greenbelts as set out in the Draft Plan.

In conclusion, the rezoning of additional lands currently zoned 'HT', 'GB' and 'OS' would facilitate the uncoordinated, ad-hoc provision of unsustainable urban generated housing detached from existing designated settlements for which there is no evidence-based need or planning rationale and would result in an amended Core Strategy that would be contrary to the *National Spatial Strategy* and *Regional Planning Guidelines* and is, therefore, contrary to proper planning and sustainable development of the County.

### Walkways and Cycleways

A cycle route from Castleknock to the Royal Canal is included as a secondary route within the NTA cycle network and will be subject to public consultation and detailed design. Access from the Phoenix Park end of the County to the Royal Canal will be assessed as part of the review of the Local Area Plan for the area (LAP 13B).

# PART TWO

---

## Commercial

The submission received in support of the 'GE' land use zoning at Cherryhound / Kilshane is noted. Significant land has been provided for in the Draft Plan for industrial, rural business and commercial land uses. There is no identified need to provide additional lands. Fingal's Economic Strategy set out in the Draft Plan seeks to attract a range of employment types, across business and industry sectors at the most appropriate and accessible locations within the County, minimising the requirement for undue commuting and improving the quality of life for Fingal's residents. Strategic Policy 10 and Objectives ED02 and ED03 of the Draft Plan seek to promote enterprise and employment throughout the County, particularly in the growth Centres of Swords, Blanchardstown and Balbriggan.

In order to maximise the utility of existing and future infrastructure provision and promote the achievement of sustainability, a logical sequential approach as advocated in the *DoECLG Development Plan Guidelines 2007* must be applied to the zoning of land for development. In this regard, areas to be zoned should be contiguous to existing zoned development lands, a strong emphasis should be placed on encouraging infill opportunities and better use of under-utilised lands and zoning should extend outwards from the centre of an urban area, with undeveloped lands closest to the core and public transport routes being given preference (i.e. 'leapfrogging' to more remote areas should be avoided). Any future zonings shall have regard to this sequential approach.

There is a more than adequate quantum of employment zoned lands within the County to accommodate any future employment growth in readily accessible locations within the County where necessary infrastructure is at an optimum. The lands at Blanchardstown Corporate Park are included within the boundaries of the Cherryhound LAP (December 2012). The purpose of this plan is to promote the lands for the development of general enterprise opportunities and employment generation, in addition to detailing a development framework strategy for a delivery of a programme of support structures to enable the development of a mixed-use area. The site at Blanchardstown Corporate Park is located within the boundaries of this LAP, where all the lands have a 'General Enterprise' land use zoning. To amend the zoning of these lands from 'GE' to 'HT' would have serious negative implications for the holistic roll out of development within the Cherryhound LAP. In addition, Local Objective 431 states: *'Provide for Local Support Facilities to serve local employee needs'*. The LAP has identified an alternative location for the service centre for the LAP lands and allowing this objective to remain would negatively impact on the proper planning and sustainable development of the area.

The lands at Newtown, Kilshane Cross are currently zoned 'GB' Greenbelt. The subject lands occupy a strategic site within the Greenbelt area, which is under significant development pressure. Rezoning of these lands from 'GB' to 'WD' (Warehouse Distribution) would lead to significant encroachment into the designated Greenbelt lands, and be to the detriment of the rural character of the area and surrounding land uses. As such, it would be contrary to the proper planning and sustainable development of the area. Allowing this change of zoning would erode the overarching greenbelt zoning and would act as a precedent for further encroachment into the rural countryside. Having consideration to the remote and rural nature of these lands, it is not considered appropriate to rezone these lands.

Four submissions requested the rezoning of lands to Objective 'GE' at Broughan, The Ward, Dublin 15 (from 'GB' to 'GE'); at Kilshane Cross (from 'GB' to 'GE'); at Dublin Airport Logistics Park (from 'WD' to 'GE'); and at Damastown Industrial Park (from 'HT' to 'GE').

## PART TWO

---

The quantum of existing GE zoned lands currently available for development is c.1218 hectares (3009 acres). These lands are located at highly accessible locations close to the motorway and national road network off the M50 and M1 corridors and at Damastown. The M50 corridor alone has an available and accessible landbank of c.399 ha's. [985 acres] of undeveloped GE zoned lands. The undeveloped landbank of GE and HT zoned lands at Courtlough equates to c. 57.6 ha's [142 acres]. These figures represent a substantial provision of GE zoned lands readily available for development.

It should be noted that the request to rezone lands at Kilshane Cross from 'GB' to 'GE' is sought to reflect the existing established uses on site. It is considered that the uses on site are existing 'non-conforming uses'. Under Section 11.5 of the Draft Plan 'Non-Conforming Uses', it is noted that: *'Reasonable intensification of extensions to and improvement of premises accommodating these uses will generally be permitted within the existing curtilage of the development and subject to normal planning criteria'*. The Draft Plan therefore provides for such uses that do not conform with the general zoning for the area.

While there is an existing enterprise on the site, the overarching land use zoning is Greenbelt – whose objective is to *'Protect and Provide for a Greenbelt'*. Allowing a 'General Employment' zoning at this location would be considered haphazard and piecemeal, and, would create an isolated pocket of general employment use which would be at variance with the objective and vision set out under this zoning objective. Such an amendment, including its precedent, would therefore be inappropriate and unnecessary. Rezoning of these lands from 'GB' to 'GE' would lead to significant encroachment into the designated Greenbelt lands, and be to the detriment of the rural character of the area and surrounding land uses. As such, it would be contrary to the proper planning and sustainable development of the area.

The lands at Broughan, The Ward are located outside of the development boundary of Blanchardstown and are included within a designated Greenbelt area. This proposed rezoning would allow for a greater variety of land uses outside of this development boundary. The Cherryhound LAP contains 240 hectares of 'General Enterprise' land most of which remain undeveloped. There is therefore no requirement for additional land to be zoned 'GE' in the north Blanchardstown area. As noted above, the rezoning of these lands from 'GB' to 'GE' would lead to significant encroachment into the designated Greenbelt lands, and be to the detriment of the character of the area and surrounding land uses and would act as a precedent for further encroachment of the rural countryside.. The N2/M2 road currently acts as a natural barrier and the rezoning of additional GE lands at this location would be contrary to the proper planning and sustainable development of the area.

It is considered that there is some merit in rezoning the lands from 'WD' to 'GE' at Dublin Airport Logistics Park. Having regard to the extent of 'GE' zoned land in the vicinity of the subject lands and the existing use on site, it is considered appropriate to revise the zoning objective of these lands to reflect that of neighbouring lands. It should also be noted that warehouse development is permitted in principle within 'GE' zoned lands.

The lands at Damastown comprise approximately 17.5 hectares and form the southern part of Damastown Industrial Park. Approximately half the land here remains undeveloped. This area of Damastown is home to a cluster of pharmaceutical operations and the current zoning is considered appropriate for such land uses.

Given the location and proximity of the High Amenity zoning to the south, it would be more appropriate to retain the subject land's land use classification of 'HT' rather than change it to 'GE'

## PART TWO

---

as this area is considered to be a 'Transitional Zonal Area'. The amenities of the more environmentally sensitive areas need to be respected and a 'HT' zoned area would be a more appropriate adjoining land use to a 'HA' zoned area than 'GE' zoned lands.

Further to the above, the National Transport Authority, in their pre-draft submission, also state that the strategic transport function of the M1 should be maintained by limiting the extent of development which would give rise to the generation of local car-based traffic on the national road network. The M1 (&M50) are vital economic corridors for Dublin, and the east coast in general, and should not be used to facilitate development of employment which would be more appropriately developed in areas well served by existing or committed high quality public transport and/or within the key settlements of Swords, Blanchardstown or Balbriggan.

In the absence of the sequential approach, any coherent evidence based need or planning rationale for the proposed change in zoning in these locations, the proposal to change a substantial proportion of lands to 'HT', 'GE' and 'WD' would result in an un-coordinated, ad-hoc provision of unsustainable employment lands of which there no evidence based need.

The proposed commercial zonings would therefore be in breach of key objectives of the current FDP 2011-2017 and the emerging Draft FDP 2017-2023 and NTA policy to channel employment growth into the large urban centres of the County, aligned with existing and planned infrastructure and as such is contrary to proper planning and sustainable development.

### Rural Village

The request to rezone lands at Hollystown from 'GB' to 'RV' is noted in the submission received.

The Draft Plan proposed a change in zoning at Hollystown from 'RV' to 'RS' for practical reasons, as the majority of the lands here have been built out. There is no longer a requirement for an 'RV' zoning at this location.

The rezoning of any additional land to Objective 'RV' at Hollystown (and surrounds) to further extend the existing development boundary would directly conflict with the Core Strategy and Settlement Strategy of the Draft Plan and is therefore not supported by any evidence based planning rationale. The quantum and location of zoned land in the County is directly influenced by the Development Plan's Settlement and Core Strategy, which seeks to accommodate projected population growth in the County in a strategic and planned manner. The Core Strategy must demonstrate that the development objectives in the Development Plan are consistent with the *National Spatial Strategy* and the *Regional Planning Guidelines*.

The allocation of housing unit numbers for the entire County area has been thoroughly analysed and addressed in the context of the Core Strategy of the Draft Plan 2017-2023 based on the directions contained in the RPG's. The allocation of new population growth and housing numbers within Fingal's Rural Villages supports the settlement hierarchy contained within the settlement strategy as defined within the Draft Plan.

This allocation represents a fair and equitable allocation based on:

- The overall allocation for the hinterland and metropolitan areas small towns and villages.
- The evidence-based approach adopted in the Core Strategy, where Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period.
- The capacity of the rural villages to accommodate growth without compromising their essential character, and
- The strong need to avoid any further suburbanisation of the Fingal rural villages

## PART TWO

---

A large number of submissions seek to rezone extensive areas of RU, RC and GB lands across the County to RV. Cumulatively, this equates to a total of c.197.85 ha's. [488 acres] representing a substantial quantum of additional RV zoned land across the County. The change in zoning of these lands would represent a piecemeal uncoordinated rezoning of lands for which there is no evidence based need and would lead to inappropriate and unsustainable settlement patterns of development and an extensive land take of valuable agricultural, high amenity and green belt lands of which it is Council policy to protect.

The Draft Plan is explicit in the protection and promotion of the value of the rural area of Fingal and the Council is firmly committed to the continued protection of this valuable resource that cannot be continually eroded. The consequential impact of the gradual erosion of the agricultural resource and greenbelt areas from additional housing is discussed in detail in Chapter 5.

The relative control on housing development within the Greenbelt is necessary to maintain the particular rural and undeveloped nature of the Greenbelt in order to demarcate clearly the edge of established settlements, provide for the continued viability of agricultural and rural uses and promote an amenity area for citizens. The density of actual rural housing development within the Greenbelt relative to other rural areas within the County provides clear evidence of the relative success of Fingal's efforts to preserve and promote the Greenbelt. The Council is fully committed to the continued protection of the Greenbelt and the erosion of the greenbelt would seriously undermine the long standing Greenbelt policy of the Council and would be contrary to the zoning objective and vision to protect Greenbelts as set out in the current FDP 2011- 2017 and the Draft Plan 2017-2023 and as such is contrary to proper planning and sustainable development of the area.

This submission seeks residential development beyond the outer edge of the existing development area of Hollystown, while considerable development opportunities currently exist within the existing rural villages and rural clusters across the County. Such a development pattern would result in deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and the loss of agricultural and green belt lands.

These considerations have formed the core basis of the approach of the local area planning of Fingal rural villages both within the hinterland and metropolitan areas. There is no evidence based reason or planning rationale for the widespread re-zonings of 'RU', 'RC' and 'GB' zoned lands to RV across the County and specifically within the area identified at Hollystown.

To significantly extend residential development beyond the outer edge of the existing built-up Village area while more preferably located lands lie undeveloped would result in deficiencies in terms of the provision of basic infrastructure and public services, in addition to unsustainable travel patterns and a poor quality, fragmented urban environment.

Furthermore, the land proposed for inclusion within the RV boundary is currently zoned as a Greenbelt and the preservation of this Greenbelt area is essential to ensure existing urban areas within Fingal do not coalesce and merge into one another. Any erosion of the Greenbelt undermines this approach.

In conclusion, there is an adequate amount of land zoned for the orderly development of Hollystown and surrounding areas. Large scale additional zoning is not required, having regard to the quantity of existing RV zoned land in the County. Such proposals would be in clear and

## PART TWO

---

significant contravention of the adopted Local Area Plans, the Core and Settlement Strategies of the current FDP 2011-2017 and the Draft Plan 2017-2023, the *Greater Dublin Area Regional Planning Guidelines 2010 - 2022* and as such would be contrary to proper planning and sustainable development of the area.

### Rezoning of lands to Local Centre (LC)

It is acknowledged that there is an anomaly in that some of the lands contained within the LIDL site at Tyrellstown are not included within the LC zoning at this location. It is recommended that this zoning should be amended accordingly and the small area of land excluded from the LC zoning now be included.

The request to rezone lands within Mulhuddart Village from 'HA' to 'LC' is noted. This site is in long standing commercial use, and contains a public house and a car park. The proposed change in zoning to LC would reflect the current existing uses on the site. As the lands are located immediately contiguous to the existing LC zoning at Mulhuddart and are of a relatively modest nature, it is recommended that these lands are rezoned from 'HA' to 'LC'.

One submission requested the rezoning of lands at Hollystown from 'GB' to 'LC'. It should be noted that no development has occurred on the existing 'LC' zoned at Hollystown and there is no justifiable reason to rezone additional land in the settlement. Consolidation and the development of key infill sites within our towns and villages is necessary to reinforce local centres as the central hub of activity resulting in vibrant and bustling local centres with a diverse mix of activities. Intensifying development within our urban areas can only occur by utilising under-developed sites within the town and village centres. Rezoning of additional lands to 'LC' would undermine the existing local centre zoning at Hollystown and the policy of consolidation of existing 'LC' areas. It is recommended that the lands therefore remain zoned Objective 'GB' and it is considered that there is sufficient 'LC' zoned land in this area to cater for the overall development of the lands at Hollystown.

### Community Infrastructure

One submission requested that the lands at Elmgreen Nursing Home be allowed to extend their existing facility at this location into an adjacent 5 acre site. No map has been submitted, although it should be noted that all land in the immediate vicinity of Elmgreen Nursing home is zoned 'Open Space' and retirement homes/retirement care homes are 'Not permitted' within this zoning objective.

The Council recognises that the provision of care for the elderly and other vulnerable people is an essential community requirement and there has been significant pressure for the development of such facilities in rural areas. However, there is a presumption against this type of development in the countryside for reasons relating to sustainability, poor accessibility and lack of public transport, social exclusion and isolation.

Objective DMS46 of the Draft Plan requires that *'residential care homes, retirement homes, nursing homes and retirement villages be located in towns and villages for reasons of sustainability, accessibility, social inclusion, and proximity to the availability of services, except where a demonstrated need to locate in a rural environment because of the nature of the care required can be clearly established.'*

The site is removed from any town / village and is located in a designated open space area. Any alterations or extensions to the existing Elmgreen facility would be dealt with under the development management process.

# PART TWO

---

The submissions requesting the removal of a 'Proposed School' objective on lands within the boundaries of the Kilmartin LAP is noted. Discussions were held with the Department of Education and Skills re the provision of school infrastructure in the area. In addition to the new post primary school located to the west of the R121 the Department of Education and Skills also required an additional post primary school, based on projected population levels in the area.

The LAP states '*Given the level of provision in existing and proposed school sites within the local area, the need for both the primary school and post-primary school site reservations will be assessed on an on going basis. Development of school facilities can occur in any phase subject too demand. In the event that the reservations for schools are no longer required, the sites (or part of) will revert to a residential land use designation*'. Given the fact that construction of residential housing has not commenced on the majority of the LAP lands it would be premature to allow the site of the proposed school to revert to residential land use at this juncture.

It is noted that the provision of new schools is primarily the responsibility of the Department of Education and Skills. Indicative school site icons are identified at strategic locations within the new development areas, with the exact location, layout and detail to be finalised at planning application stage. It should be noted that Fingal's property section is currently working with the Department of Education and Skills in identifying appropriate sites at this location.

Furthermore, if alternative sites are considered more suitable, become available or are required in the future, the Council will work with the Department of Education and Skills and other bodies to ensure the development of schools at the optimum locations. The Planning Authority is of the view that the school symbols should remain in situ at this time and this approach accords with the submission received from the Department of Education and Skills.

## Masterplan 11B

Given the extent of development on the subject lands (Dublin Airport Logistics) in recent years, including infrastructure provision in accordance with agreed Masterplans and planning consents, it is considered appropriate now to revise the boundaries of Masterplan 11.B to omit the subject lands.

## **Recommendations**

### **CE SH 12.1:**

Include all of the lands within the LIDL site at Tyrrelstown within the 'LC' zoning

### **CE SH 12.2:**

Rezone lands in Mulhuddart Village from 'HA' to 'LC'

### **CE SH 12.3:**

Rezone lands at Dublin Airport Logistics Park from 'WD' to 'GE' and update Table 6.3 Economic Development Zonings accordingly.

### **CE SH 12.4:**

Omit Dublin Airport Logistics lands from Masterplan 11.B and revise the boundaries accordingly.

# PART TWO

## Sheet 13 Blanchardstown South

### Submissions Received Relevant to this Sheet

D00040 D00048 D00069 D00090 D00131 D00170 D00184 D00187 D00225 D00350 D00358  
D00370 D00373 D00388 D00401 D00406 D00412 D00416 D00426 D00454 D00455 D00477  
D00494 D00495 D00512 D00521 D00529 D00531 D00533 D00534 D00547 D00569 D00581  
D00583 D00599 D00607 D00613 D00614 D00629 D00640 D00656 D00663 D00673 D00694  
D00703 D00712 D00717 D00732 D00746 D00748 D00808 D00814

(Please see appendices for map based changes).

### Summary of Issues Raised

#### Rezoning GB to RS/RA

A number of submissions seek to rezone GB-Greenbelt lands to residential [RS/RA] at Barnfield/Passifyoucan to the west of Hansfield, Blanchardstown, to the west of Cappagh Hospital and to the west of Barnhill LAP lands.

#### Rezoning from HA to RS/RA/TC/CI

Rezoning lands from HA to RS (eastern side of Lucan/Clonee road) as it is stated that the current use of the site does not conform to the zoning of the lands and surrounding land use.

Rezoning lands from HA to RS (sheet 13 Dunsink Lands Study Area) and the removal from the Dunsink Lands Study Area.

Rezoning lands from HA to TC to the rear of Justin's Flowers, Main Street Blanchardstown.

Rezoning lands from HA to CI or attach new local objective to read as follows 'To facilitate the reasonable expansion of the existing of the existing care facility at Marymount, Westmanstown, with due consideration being given to the protection of the amenities of the properties/lands in the vicinity'.

Rezoning HA (part of existing Castleknock Golf Club lands) to CI with a local objective for a nursing/retirement home at the site.

Rezoning lands to the west of Laraghcon residential estate (Barnhill Cross Roads, Lucan) from HA to RA.

#### Rezoning from OS/HA/RS to CI/RA/RS

Rezoning 0.25 ha's. of lands from OS to RA to tie into remaining linear lands along the Royal Canal.

Rezoning lands at Diswellstown, Castleknock from 'OS' to RA'.

Rezoning land from OS to RA adjoining the lands at Barnhill.

Rezoning lands at Scribblestown/Dunsink, D15 from OS and HA to RA with preparation of LAP.

Rezoning lands from 'OS' to RS' at Windmill, Porterstown, Clonsilla.

Rezoning lands at Collegefort from OS zoning to RA.

# PART TWO

Rezone a portion of the National Sports Campus, Abbotstown from 'OS' to 'CI' and removal of Local Objective 105.

Rezone lands at Waterville from OS to CI.

Amend the zoning of land north of Connolly Hospital which are utilised as part of the healthcare facilities on campus, zoned RS and OS to Community Infrastructure. Amendment is also sought to Local Objective 104 to ensure that future healthcare needs in line with Government policy can be provided for at Connolly Hospital.

## **Rezoning from RA to RS**

A submission refers to 2(no.) parcels of lands at the N3 and the following amendments are sought – i)Rezone Fairhaven (Phase 2) from RA to RS; ii)Remove requirement for a Masterplan (MP13.A) from Part A lands (south of M3) the development of which has been approved and is the subject of extant planning permissions.

Lands north of the N3 (described as Part B lands 4.9 ha) in submission

Amendments sought –i) Remove requirement for a LAP (LAP 13.B) from the Ashtown Business Centre site as this site is accessible to the N3 and forms a logical extension of the Ashtown Business Centre. ii). Remove the requirement for a Local Area Plan (LAP 13.B) from the Railway Station Site which has existing access from the N3 Interchange and directly adjoins an existing main line railway station.

One submission supports the residential zoning [RA] objective relating to the Barnhill LAP lands and cites a number of reasons in the submission for the development of these lands.

## **Open Space and Recreational Amenities and Natural Heritage**

Concerns are expressed in relation to the limited extent of family facilities in Laural Lodge.

Concerns expressed in relation to the extent of open space areas indicated at Old Corduff Road and Greenridge Court.

Remove lands from the Liffey Valley SAAO.

## **Built Heritage**

One submission seeks to list both Glenmaroon House and Knockmaroon House as separate entities on the Record of Protected Structures.

The designation of Church Avenue as an ACA should be investigated in consultation with the Conservation Officer for future consideration.

## **Proposed Local Objectives**

A submission seeks that a Specific Objective be attached to Verona FC playing pitch outlined on the attached map to require that no development shall take place prior to the relocation of Verona FC to a new home or an agreement with the club to do the same.

A submission requests that the Development Strategy for Castleknock Village acknowledges the adjacent location to the historic Phoenix Park, noting in particular the presence of the Ashtown, Castleknock, Whites and Knockmaroon Gates to the Park within the Castleknock Village area.

# PART TWO

---

It is also noted that the location of the Village is an important gateway to Fingal and in this regard the inclusion of an objective in the Development Plan to promote and enhance the gateway is requested.

A further objective is requested to be included to improve the cycle facilities within the village, in particular the linkage of these facilities with the network of cycle lanes within the Phoenix Park.

A submission requests a Local Objective to be included to protect remaining mature hedgerows in the area particularly for ecological reasons and to protect the character of the area which is in close proximity to the Tolka Valley Park.

A submission seeks an additional map based objective, Sheet 13, Blanchardstown South which would state: 'Provide for a burial ground of up to 3 hectares within the Rugged Lane area.'

A submission requests the insertion of a Local Objective regarding access into development on the east side of the R149 into Hansfield and Barnhill LAP 13.A lands.

A submission seeks the realisation of Objective 123.

## **Amend Local Objectives**

One submission seeks the amendment of Local Objective 122 to include reference to Ashleigh Housing Estate as follows: Facilitate the provision of noise abatement barriers along the M50 adjacent to Laurel Lodge and 'Ashleigh' housing estates.

## **Reinstatement of Local Objectives**

One submission seeks the reinstatement of Local Objectives No's 642, 643, 644 and 646 relating to lands at Lucan, Co. Dublin. The lands are currently zoned HA.

One submission seeks the reinstatement of local objective 652 as follows: 'Provide for a nursing/retirement home which shall ensure the sympathetic and appropriate reuse, rehabilitation and retention of Glenwood House and its conservation to a high standard, ensuring also that the special interest, character and setting of the building is preserved,.

A further submission seeks to reinstate Local Objective 509, 'any development in this area shall be consistent with existing and immediately surrounding development and amenity areas'.

## **Transportation and Movement**

The following are recommended:

SLO 122 – Submission proposes that noise barriers must be put in place all along the M50 from the Laurel Lodge area across all of the M50 Bridge to the south of the Liffey Valley.

SLO 134 – Submission seeks clarification on the detail of the access route to the Lower Road and clarification on how pedestrians are safely expected to travel along the Lower Road to Anna Liffey Mills.

SLO 135 – Submission supports this proposal if the intended location of the carpark is beside or within Porterstown Park.

SLO 140 - The protection of the trees and flora and fauna requires a detailed conservation plan with action points to be included in the Development Plan.

SLO 142 - Submission seeks clarity on the proposed pedestrian route between the Royal Canal and the River Liffey.

## PART TWO

---

SLO 144 - Submission seeks clarification on the proposed pedestrian/cycle route between the Castleknock GAA and Waterstown Park. In particular, the need to ensure the safety of pedestrians and cyclists along such a route is highlighted.

SLO 145 - Clarification sought for the plans in relation to the Lower Road where any pedestrians would end up after walking down a route along the Glen. The safety of cyclists and pedestrians must be considered in the detail of any proposal and the provision of any cycle lanes or pathways must be consistent with the protection of the trees/hedge rows/flora/fauna as legally afforded by the SAAO.

SLO 146 - Provision of any cycle ways to be consistent with the protection of the trees/hedge rows/flora/fauna and the overall characteristic of the area as legally afforded by the SAAO and any traffic management plan for the area should be prepared in consultation with residents.

SLO 147 - Submission does not support a metro west bridge across the Liffey Valley on grounds of being against principles of SAAO.

The submission considers that the existing proposal to locate the proposed Greenway on the existing tow/walking path to the south of the canal at the pinch point area, identified as the Castleknock/Carpenterstown 'Pinch Point' would have a negative impact on the landforms and natural habitats where the Deep Sinking represents a unique snapshot of historical engineering and heritage. The submission seeks to look at option(s) of locating the Greenway to the north of the canal at the pinch point, with the possibility of developing a linear park.

Remove Metro West Route and references to same.

One submission seeks the development of a bridge from Royal Canal over Railway to St Catherine's Park.

Support for the proposal to build a cycle / pedestrian route along Royal Canal. It is suggested in relation to Objective 142 that the pedestrian Link between Royal Canal and River Liffey should be a cycle and pedestrian link.

A pedestrian and cycle route linking the Royal Canal and the River Liffey is supported

One submission seeks the provision of a pedestrian operated traffic light crossing at Knockmaroon Hill.

It is considered appropriate that the Huntstown bus gate be constructed

### **Industrial/Commercial/Retail**

Concern expressed that a large number of units within Coolmine Industrial Estate are greater than 200sqm, contrary to objective for the area.

Rezone lands from RS to GE to reflect established and permitted non-residential development on the ground at Lohunda, Clonsilla.

Rezone lands indicated as being subject of a Masterplan (Former Total Fitness Centre, N3, Blanchardstown) from 'HT' to 'LC' to facilitate the development of a hotel on the site with offices over.

Amend the HT land use zone to include a hotel as a 'Permitted Use' or alternatively amend the Draft Plan to facilitate the development of a hotel on the submission lands.

# PART TWO

---

Rezone TC to LC in Castleknock Village.

A submission supports TC zoning of land and 6 specific objectives for Castleknock.

## **Blanchardstown Town Centre and surrounding area**

One submission seeks an expansion of the Core Retail Area of the Blanchardstown Town Centre. The submission also questions the expansion of Verona Clubhouse and Sports Pitches from OS to MC and requests clarification on the relationship between the Masterplan referred to in the vision for the MC zoning and the UFP referred to in Objective Blanchardstown 1 and as shown on Map 13. Clarification is also sought as to whether the UFP area relates solely to the historic village or if it also includes the Blanchardstown Town Centre and associated retail parks as indicated on zoning objective Map 13.

One submission seeks the protection of an existing radio station within Blanchardstown Town Centre.

## **Blanchardstown Village and surrounding Area**

The change in zoning from RS to TC at Blanchardstown Village is supported and welcomed and its retention under the final adopted Plan is requested.

Regarding Objective 112, it is requested that the wording be amended to include no increase in height at Roselawn Shopping Centre.

## **Masterplan**

One submission seeks the amendment of Masterplan brief for Porterstown, Clonsilla as follows; 'No more than 50% of the residential or commercial units shall be sold or occupied pending the full reinstatement of the Protected Structure to the satisfaction of the Planning authority'.

## **General**

Incorporate Castleknock College within the development boundary of Blanchardstown, rezone part of lands from HA to RS, Relocate Dublin 15 Priority Cycle Route scheme 2.

The submission from Portersgate Residents Association refers to local objective 111 of the Draft Plan and specifically notes that within the area of this objective, neighbourhood centre development should not be included in this location in order to prevent linear development of the village. Retail development should be concentrated in Clonsilla Village core to allow for proper planning and development of services in the village core.

Note: The lands referred to in this submission are zoned TC, it is noted that the area of the TC zoning has been reduced in the Draft Plan.

In relation to local objective 123, the submission requests that this objective include the provision of a cycle and pedestrian route from the Royal Canal Greenway (Pakenham Bridge) via Westmanstown to Lucan Village. This will connect both Clonsilla Village and Lucan Village in an eco-friendly way and will allow ease of access to Westmanstown Sports Centre for youths involved in the various sports clubs and all local residents.

This submission submits that local objective 111 of the Draft Plan is not in keeping with the existing housing height and density in the Clonsilla town land. Existing housing is traditional 2 storey detached and semi-detached and the submission specifically requires that this objective

# PART TWO

be amended to reflect the current situation and be in keeping with the existing housing neighbouring the site.

## **Chief Executives Response**

### **GB to RS/RA**

Table 2.6 in Chapter 2 of the CE's Draft Plan sets out the remaining zoned residential capacity from the current Fingal Development Plan 2011-2017. As of mid-2015, there were approx. 1,461 ha of zoned land available within the County with the potential to deliver approx. 43,041 residential units. Tables 2.4 and 2.5 of the CE's Draft Plan set out the RPG population and housing targets for Fingal together with the number of residential units required in Fingal to meet those targets. The existing number of units in the County as of July 2015 was 105,392 and based on the estimated RPG target of 145,340 for 2023, the number of units required to meet the RPG target is 39,948 units. It is therefore clear, based on the evidence-based approach adopted in the Core Strategy, that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period. There is therefore no requirement to zone this GB zoned land to 'RS'.

The lands are located outside of the development boundary of Blanchardstown and as such allowing the zoning of these lands to residential would fail the sequential test with respect to the sustainable development of the area. Development of lands here would represent piecemeal and haphazard planning and would be contrary to proper planning and sustainable development.

This rezoning would also incur a significant loss of GB lands which currently form part of the Strategic Greenbelt. Objective SS05 seeks to 'Strengthen greenbelt lands by identifying opportunities for infill development and consolidation of existing towns to reduce the need to zone additional greenfield lands and ensure the preservation of strategic greenbelts between out towns and villages.' Development of this site would represent encroachment and incremental erosion into the Greenbelt.

### **HA to RS/RA/TC/CI**

Table 2.6 in Chapter 2 of the CE's Draft Plan sets out the zoned residential capacity from the current Fingal Development Plan 2011-2017. As of mid-2015, there were approx. 1,461 ha of zoned land available within the County with the potential to deliver approx. 43,041 residential units. Tables 2.4 and 2.5 of the CE's Draft Plan set out the RPG population and housing targets for Fingal together with the number of residential units required in Fingal to meet those targets. The existing number of units in the County as of July 2015 was 105,392 and based on the estimated RPG target of 145,340 for 2023, the number of units required to meet the RPG target is 39,948 units. It is therefore clear, based on the evidence-based approach adopted in the Core Strategy, that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period. There is therefore no requirement to zone HA – High amenity zoned land to residential at these specified locations. Furthermore, the lands are located outside of the development boundary of Blanchardstown and as such allowing the zoning of these lands to residential would fail the sequential test with respect to proper planning and sustainable development.

Whilst there is a non-conforming use on site [ie. on the eastern side of Lucan/Clonee road], zoning the land RS would incur a loss of land zoned HA. Objective GI05 states 'Resist development that would fragment or prejudice the County's strategic infrastructure network'. Development of this site would represent encroachment and incremental erosion of the HA zoned lands.

## PART TWO

---

The lands associated with Ashtown House are situated within the Tolka Valley and are strategically located wedged between the Royal Canal and Tolka River inclusive of a Protected Structure. Any development on this site needs to be undertaken in the context of the Dunsink Study for an overall coordinated approach to the development of the entire area. Allowing isolated development within the Study Area would be contrary to the principle of the proper sustainable development of the area.

The majority of the land referred to is located to the rear of cottages to the east of Justins Flowers. The land take appears to incorporate a stream linked to the Tolka River. This HA zoned land is located within the valley area of the Tolka River. This HA zoning land is located directly off the Main Street Blanchardstown and located within the catchment of a significant element of the population of Blanchardstown. The zoning of TC would incur a significant loss of lands zoned HA. Objective GI05 states 'Resist development that would fragment or prejudice the County's strategic infrastructure network'. This is one such instance. There is a significant amount of zoned TC land with the Main Street area of Blanchardstown Village. There is no requirement for any more land to be zoned TC at this juncture.

The existing nursing home referred to above is a non-conforming use and as such reasonable intensification of extensions to and improvement of premises accommodating these uses will be assessed and dealt with under Objective Z05 of the Draft Plan through the Development Management process. In this context, there is no need to rezone the land or insert a Local Objective.

The lands [part of the Castleknock Golf Club] are located outside of the development boundary of Blanchardstown. The provision of a nursing home at this location would be contrary to Objective PM43 and PM44 which state

*PM43*

*Require that residential care homes, retirement homes, nursing homes and retirement villages be located in towns and villages for reasons of sustainability, accessibility, social inclusion, and proximity to the availability of services, except where a demonstrated need to locate in a rural environment because of the nature of the care required can be clearly established.*

*PM44*

*Consider the existing (and anticipated) character of the area in which a proposed residential care home, retirement home or nursing home is to be located and the compatibility of the use to such an area.*

Development of lands here for a nursing home/retirement home would represent piecemeal and haphazard planning. The zoning of CI would also incur a loss of lands zoned HA and be contrary to Objective GI05 referred to above.

The Draft Plan affords a high level of landscape value and protection to high amenity areas including the Tolka valley. The High Amenity zoning objective seeks to, 'Protect and enhance high amenity areas.' The vision associated with the objective seeks to, 'Protect these highly sensitive and scenic locations from inappropriate development and reinforce their character, distinctiveness and sense of place. In recognition of the amenity potential of these areas opportunities to increase public access will be explored.' The Council will continue to protect these high amenity areas and will resist development that would fragment or prejudice the County's high amenity lands and their role in the green infrastructure network for the County.

# PART TWO

## OS/HA/RS to CI/RA/RS

Table 2.6 in Chapter 2 of the CE's Draft Plan sets out the remaining zoned residential capacity from the current Fingal Development Plan 2011-2017. As of mid-2015, there were approx. 1,461 ha of zoned land available within the County with the potential to deliver approx. 43,041 residential units. Tables 2.4 and 2.5 of the CE's Draft Plan set out the RPG population and housing targets for Fingal together with the number of residential units required in Fingal to meet those targets. The existing number of units in the County as of July 2015 was 105,392 and based on the estimated RPG target of 145,340 for 2023, the number of units required to meet the RPG target is 39,948 units. It is therefore clear, based on the evidence-based approach adopted in the Core Strategy, that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period. There is therefore no requirement to zone OS/HA zoned land to residential. Allowing the zoning of these lands to residential would fail the sequential test with respect to the principle of proper planning and sustainable development.

The lands at Diswellstown, Castleknock to remain as open space to serve the immediate need of the housing area at Diswellstown. The land area is wedged between the new residential area and the M50 Motorway and acts as a much needed buffer between this residential area and traffic on the M50.

Regarding the rezoning of lands from 'OS' to RS' at Windmill, Porterstown, Clonsilla, these open space lands form part of the established housing area [permitted under a previous planning permission] for the benefit of residents and the overall environmental quality and amenity of the area. Changing these 'OS' lands to 'RS' is not appropriate in this context.

Regarding the change in zoning of land from "OS" Open Space to "CI" Community Infrastructure on lands which form part of the Abbotsstown Sport Campus The proposed rezoning to will facilitate existing uses on the site while ensuring the future viability of the campus. It is recommended to rezone accordingly. The local objective should remain in place to facilitate access to this publicly owned land for the residents of Waterville and beyond.

Regarding the change in zoning of land from "OS" Open Space to "CI" Community Infrastructure on lands which form part of Waterville housing development, under F99A/0379 planning permission was granted on site for 1520 residential units. The area, the subject of this submission, forms part of the public open space provision associated with F99A/0379. The landscaping plan submitted with F99A/0379 shows walkways through this area of public open space, (such walkways have not been provided to date). The proposed rezoning to "CI" will result in the loss of an area of open space clearly identified to be used by the residents of Waterville. There is some tree cover on the lands the subject of this submission. The woodland is part of the historic landscape of the area and is associated with Abbotstown House. Under the Chief Executive's Draft Plan 2017-2023 there is a Specific Objective to 'Protect and preserve trees, wood lands and hedgerows' on this site. The tree cover affords significant amenity value for the residents of Waterville and offers a soft boundary between the newly developing residential area to the south and the National Sports Campus to the north.

The CI zoning at Connolly Hospital shall be extended to cover all the land where CI activities on the campus are occurring. Amend LO 104 to read as follows; 'Facilitate and promote synergies between Connolly Hospital, Institute of Technology Blanchardstown (ITB) and related industries *'and ensure that future healthcare needs in line with Government policy can be provided for at Connolly Hospital.'*

# PART TWO

---

The Draft Plan is explicit in its promotion of quality open space for the benefit of residents and communities. The provision of accessible open space is an integral part of the provision of high quality green infrastructure for communities and forms a core element in the Green Infrastructure of the County. The Council is firmly committed to the protection of existing open spaces areas across the County and specifically within residential areas in this context.

The Draft Plan affords a high level of landscape value and protection to high amenity areas. The High Amenity zoning objective seeks to, 'Protect and enhance high amenity areas.' The vision associated with the objective seeks to, 'Protect these highly sensitive and scenic locations from inappropriate development and reinforce their character, distinctiveness and sense of place. In recognition of the amenity potential of these areas opportunities to increase public access will be explored.' The Council will continue to protect these high amenity areas and will resist development that would fragment or prejudice the County's high amenity lands and their role in the green infrastructure network for the County.

## **RA to RS**

The Council is in agreement that Fairhaven (Phase 2) be rezoned from RA to RS as it is essentially built out. Development on the remainder of the subject lands has been slow and the Council would be of the view that a Masterplan would aid the development of the area into the future, given that the principle permissions are now dated i.e. Reg. Ref. F02A/1255 and F08A/1292.

The lands to the north of the N3 are located in a prominent position on the entrance to Dublin City and as such warrant a comprehensive planning approach for their development. They should be seen as a single land bank and any attempt to develop part of it is considered haphazard and piecemeal, it is within this context that the LAP requirements at these locations shall remain.

## **Open Space and Recreational Amenities and Natural Heritage**

The large park in question does not have any recreational facilities located upon it. Objective GI25 states '*Maximise the use and potential of existing parks, open space and recreation provision, both passive and active, by integrating existing facilities with proposals for new development and by seeking to upgrade existing facilities where appropriate.*' The parks section of the Council is constantly reviewing the type and location of recreational facilities within the overall County. As part of this review all green areas are considered. Laural Lodge is on such area. Given limited resources the Council needs to provide the facilities where they have the greatest impact and are cost efficient.

It is considered appropriate to designate open space areas at Old Corduff Road and Greenridge Court as OS on the relevant zoning map.

The Liffey Valley SAAO came into effect on the 8<sup>th</sup> March 1990. The boundaries of the area were set by Ministerial Order in the exercise of his power conferred on him by Section 43(3) of the Local Government (Planning and Development) Act 1963. The Development Plan is not the appropriate mechanism to seek to alter the boundaries of the land designated under the Special Amenity Area Order.

## **Built Heritage**

It relation to Glenmaroon House complex it is recommended that the complex be listed as individual structures (756a – 756e).

# PART TWO

The Draft Development Plan under Objective CH28 states: *'Identify any potential new ACAs and evaluate and modify existing ACAs where necessary during the lifetime of the Plan.'* The Council will review the merit of the proposed ACA at Church Avenue, over the life of this Development Plan under this objective.

## Proposed Local Objectives

While the Development Plan is not the appropriate mechanism for agreements between private parties and the Council, in the event that Verona F.C. is to move away from their current location, Fingal County Council will facilitate their relocation with any future development proposals for these lands the subject of consultation with all stakeholders.

While the contents of the submission are acknowledged, it should be noted that Ashtown, Castleknock, Whites and Knockmaroon Gates to the Phoenix Park are not located within the Castleknock Village area.

There is indicative cycle and pedestrian routes identified on Sheet 13 which if developed will improve these facilities in the village. Objective CASTLEKNOCK 3 specifically encourages facilities for pedestrian and cyclists in the village.

The Council recognises the character of the village and seeks to promote it as an attractive gateway to Fingal under the development strategy for the area

The contents of the submission are acknowledged and it should be noted that all proposals for development must take account of the County's strategic green infrastructure resources and ensure that these are protected, managed and enhanced as new development takes place. Hedgerows will be protected as far as practicable when development is occurring. As such there is no requirement for a Local Objective.

The proposed site is situated on lands identified as Zoning Objective "HA" High Amenity where burial grounds are permitted in principle. As such, in the absence of any future Local Area Plan for the area, the consideration for the location of a burial ground in this area is best considered as part of the Development Management process.

The insertion of a local objective to allow access is considered premature for the following reasons; The SDZ states *'alternatively, when the N3-N4 Road Link is constructed and available for traffic, a safe and convenient access may then be possible off the Barnhill Road'*. This road has not been constructed. In addition, the determination of the access arrangements for the lands contained within the Barnhill LAP boundary will be determined through the LAP process. Inserting a local Objective at this stage is premature pending analysis of the proper planning and sustainable development of the area which will include access arrangements.

The Garda GAA and Westmanstown Gaels Clubs are in support of Objective 123 which reads *'Provide for pedestrian and cycle facilities on the Westmanstown Road which link to Pakenham Bridge and the Royal Canal.'* They wish to see this objective remain as an objective in the Development Plan. The Planning Authority is in agreement with this.

## Amend Local Objectives

The intention of the motion to facilitate the provision of noise abatement barriers along the M50 adjacent to Laurel Lodge and 'Ashleigh' housing estates is recognised, however, the M50 is managed by Transport Infrastructure Ireland as a national major artery. Decisions on the proposed measure are not within the control of the Council and in this regard it would be both

# PART TWO

---

misleading and inappropriate to include a local objective such as that proposed in the Development Plan.

## **Reinstatement of Local Objectives**

Local Objective 643 relates to the preparation of a study of lands, currently in industrial use, to identify the mix and scale of uses and access arrangements appropriate to this visually sensitive area and the Council's objectives for the Liffey Valley SAAO and environs and to provide for the long term relocation of existing non-conforming industrial uses in this area and accordingly this objective should be retained.

Local Objective 642 relates to the reduction of the impact of the concrete works and builders suppliers. The retention of this objective, at this time, is considered at variance with the above referenced local objective 643 which seeks to provide for the long term relocation of existing non-conforming industrial uses in this area and accordingly it is considered that the consideration of the reinstatement of this objective is premature pending the completion of the afore mentioned study.

Local Objective 644 and 646 relate to the existing non-conforming use on site. Under Section 11.5 Non-Con-Conforming Uses *'Reasonable intensification of extensions to and improvement of premises accommodating these uses will generally be permitted within the existing curtilage of the development and subject to normal planning criteria'*. The Draft Development Plan therefore provides for such uses that do not conform with the general zoning for the area.

Chapter 3 of the Draft Plan recognises that the provision of residential care is an essential community requirement. However, the proposed use included in the Local Objective are not permitted under the HA zonings on site. The inclusion of a map based Local Objective, which would not be consistent with the policies and objectives contained in the provisions of the relevant chapter of the Development Plan or Appendices are legally flawed and open to legal challenge. Any local objectives that render nugatory relevant policy considerations including Guidelines cannot be considered to be consistent with the principles that inform these policy considerations and adopted criteria. It is noted there is a protected structure at the site and therefore Objective CH21 applies. This states: Objective CH 21 relates to a relaxation of site zoning restrictions in relation to the protected structures on a site. It is for the betterment of the existing protected structures on a site. This objective affords a level of flexibility on a future use for the existing protected structures on a site to ensure preservation and conservation of the existing protected structures on its attendant grounds and would apply in this instance. Section 5.2, subsection Vernacular Dwellings and Vernacular Outbuildings also encourages the redevelopment and reuse of existing vernacular structures.

In relation to LO 509, it should be noted that the area to which the submission related has been substantially developed and the consideration of any future individual applications for permission are best assessed as part of the Development Management process.

## **Transportation and Movement**

The Draft Plan seeks to provide the necessary policy framework to facilitate the delivery of future development of this area and sets the policy contexts for individual planning decisions, the delivery of which is carried out by private developers and public operations.

Given that the Plan provides for high level objectives, the provision of specific road, cycle and walking infrastructure is guided by project specific design. This design process will seek to ensure the provision of safe, efficient, effective and sustainable infrastructure for the community.

# PART TWO

---

All proposals for development must take account of the County's strategic green infrastructure resources and ensure that these are protected, managed and enhanced as new development takes place. Hedgerows will be protected as far as practicable when development is occurring. As such there is no requirement for a Local Objective.

While Metro West has not been included in the Government's capital programme 2016 -2021, a significant amount of preliminary design work has already been carried out. Although the exact route has not been approved, it is prudent to maintain a corridor free from development to allow a light rail transit system in the future. In this context, Objective 147 shall be amended to reflect this.

A feasibility Study for Royal Canal Greenway was conducted in 2012. The Part 8 process will be used to further the project and a submission or observation in relation to the proposed development, dealing with the proper planning and sustainable development of the area in which the development would be situated may be made in writing at this stage.

The provision of pedestrian crossings is a matter for the Council's Operations Department.

## **Industrial/Commercial/Retail**

Objective Coolmine 2 of the Draft Plan seeks to, 'Ensure no individual unit within the LC zoning is larger than 150m<sup>2</sup> nfa. This objective is in relation to any future development in the LC zoned area of the industrial estate.

The contents of the submission relating to lands Lohunda, Clonsilla are acknowledged, however, it should be noted that whilst there may be a permitted GE use on the site, this is an isolated pocket of industrial land use within an overwhelmingly residential land use area. The existing garage/workshop on site is a non-conforming use and as such reasonable intensification of extensions to and improvement of premises accommodating these uses will be assessed under Objective Z05 of the Draft Plan through the Development Management Process. In this context, there is no requirement to rezone the subject lands to GE. Allowing the zoning change in this isolated pocket could allow for uses that are detrimental to the area as a whole.

It is noted that lands relating to the former Total Fitness Centre, N3, Blanchardstown are not subject to a Masterplan. Under the HT zoning objective a hotel is a land use that is open for consideration. Any future proposals for a hotel would be assessed under the zoning objective and vision relating to the lands and other relevant standard planning criteria through the Development Management Process. A local objective for a hotel is therefore not required in this context.

There are sufficient amounts of LC and TC zoned land within Blanchardstown and as such there is no requirement to zone any additional lands. The rezoning of these lands would lead to an isolated pocket of LC or TC zoned land, only accessible by car given its location which is surrounded by the N3/M50. A rezoning of these lands would not accord with proper planning and sustainable of the area.

The facilities and scale of existing development at Castleknock determine that this area is designated a Town Centre. Its distance from other Town Centres, location on the east side of the M50 with a large residential population and no competing Local Centres gives the settlement the conditions to allow Town Centre uses here.

# PART TWO

---

In addition there is no confusion between the designation of Castleknock as a 'Town Centre' and the six written objectives for Castleknock Village to compromise the subsequent preparation of any future Urban Framework Plan.

The Planning Authority welcomes the support for existing policy. Comments are noted in relation to the retail hierarchy which must take cognisance of the Retail Planning Guidelines.

## **Blanchardstown Town Centre and surrounding area**

The expansion of the core retail area at Blanchardstown will firstly allow for land uses that are relevant for sites so close to a town centre rather than it staying as a football pitch, and secondly allow for additional landowners so that development of the area is not dependant on a single commercial entity.

The role of the urban framework plan for Blanchardstown Village to guide and inform future development of previously developed brownfield areas which includes the consideration of improvements to the existing Village streetscape and environment through appropriate high quality infill development. The proposed Masterplan will consider the wider holistic development of the area in relation to both greenfield and brownfield development having regard to urban conservation, public transport requirements, pedestrians and cyclists facilities and proposals to minimise the impact of private car based traffic whilst enhancing and developing the existing urban fabric. The boundaries of the Urban Framework Plan will be amended as far as the Snugborough Road and a new objective inserted to provide for an urban framework plan for Blanchardstown Town Centre.

The role of the existing radio station to the community is recognised and the existing use on the site is supported by the zoning to which it relates. Accordingly it is not considered that a further objective is necessary in this instance.

Please refer to Chapter 6 of this CE report for the CE response regarding the proposed change in zoning from OS to MC relating to Verona F.C. lands.

## **Blanchardstown Village and surrounding Area**

The positive recognition of the proposed rezoning to TC at Blanchardstown Village is welcomed.

The Council supports the retention of the current height requirement at Roselawn Shopping Centre. It is considered more appropriate that the redevelopment of the shopping centre be dealt with in the context of the Development Management Process.

## **Masterplan**

The existing Masterplan brief states 'No residential or commercial units shall be sold or occupied pending the full reinstatement of the Protected Structure to the satisfaction of the Planning authority'. To ensure that the area develops in a comprehensive and sustainable way this element of the Masterplan brief should remain.

## **General**

The submission to alter the development boundary of Blanchardstown is linked to the additional proposal to change the zoning of the land from HA to RS.

Table 2.6 in Chapter 2 of the CE's Draft Plan sets out the remaining zoned residential capacity from the current Fingal Development Plan 2011-2017. As of mid-2015, there were approx. 1,461 ha of zoned land available within the County with the potential to deliver approx. 43,041

## PART TWO

---

residential units. Tables 2.4 and 2.5 of the CE's Draft Plan set out the RPG population and housing targets for Fingal together with the number of residential units required in Fingal to meet those targets. The existing number of units in the County as of July 2015 was 105,392 and based on the estimated RPG target of 145,340 for 2023, the number of units required to meet the RPG target is 39,948 units. It is therefore clear, based on the evidence-based approach adopted in the Core Strategy, that Fingal has a significant and sufficient quantum of zoned land to meet the RPG targets for the Development Plan period. There is therefore no requirement to zone this HA zoned land to 'RS'.

The lands are located outside of the development boundary of Blanchardstown and as such allowing the zoning of these lands to residential would fail the sequential test with respect to the sustainable development of the area. Development of lands here would represent piecemeal and haphazard planning. The zoning of RS would also incur a loss of lands zoned HA. Objective GI05 states 'Resist development that would fragment or prejudice the County's strategic infrastructure network'. This is one such instance. Development of this site would represent encroachment and incremental erosion of the HA zoned lands where 5 no. Protected Structures are situated.

Time and effort was put into investigating a route for the Dublin 15 Priority Cycle Route scheme which has been identified on Sheet 13. This route is acceptable to the Planning Authority. At this location the most direct route has been taken on the southern side of the subject lands. Even if the route was altered to go around these lands most cyclists would follow the direct route on the southern side of the lands. It makes transport planning sense to maintain the route as identified.

Clonsilla is taken as that area of the village between the train station and St Mochtas School. The provision of Town Centre uses within this area is acceptable. The provision of a development of maximum height of 3 storeys is acceptable within a TC area.

Objective 114 - any feasibility study will assess the proper access arrangement over the railway line and Royal Canal. A bridge is required for the proper functioning of the transport infrastructure in the area.

The biodiversity objectives within the plan protect the existing hedgerows.

The provision of an ACA at this location should be determined by the Conservation Officer

The functioning of the Clonsilla Level Crossing is not within the control of the Council  
Urban Centre Strategies are to be replaced within the Development Plan process.

Objective 123 reads *'Provide for pedestrian and cycle facilities on the Westmanstown Road which link to Pakenham Bridge and the Royal Canal'*

Open space and its decoration is undertaken on an ongoing basis by the Parks Section of the Council.

In relation to objective 123, it is considered that an objective to include the provision of a cycle and pedestrian route from the Royal Canal Greenway (Pakenham Bridge) via Westmanstown to Lucan Village is premature pending a feasibility study. The merit of the study is however noted.

It is considered that the existing objective 111 takes due consideration of the existing character of Clonsilla by ensuring that height and density should be appropriate to a village setting and in

# PART TWO

---

keeping with existing housing in the core Clonsilla Village. Individual proposals should be assessed on their merits in the context of this objective. Objective 111 – Housing built on the site will be of a height and density appropriate to a village setting and in keeping with existing housing in the core Clonsilla Village area and to a maximum of three storeys.

## **Chief Executive Recommendations**

### **CE SH 13.1**

Amend CI zoning at Connolly Hospital to reflect existing CI uses.

### **CE SH 13.2**

Amend LO 104 'Facilitate and promote synergies between Connolly Hospital, Institute of Technology Blanchardstown (ITB) and related industries *'and ensure that future healthcare needs in line with Government policy can be provided for at Connolly Hospital'*

### **CE SH 13.3**

Rezzone the lands at Fairhaven from RA to RS.

### **CE SH 13.4**

The areas of OS should be designated as OS on the Draft Plan Map at Old Corduff Road and Greenridge Court.

### **CE SH 13.5**

Glenmaroon House complex to be listed as individual structures (756a – 756e).

### **CE SH 13.6**

Re-instate Local Objective 643.

### **CE SH 13.7**

Insert a Local Objective to provide for a bus-gate between Huntstown Wood and Littlepace.

### **CE SH 13.8**

Amend the boundaries of the Urban Framework Plan as far as the Snugborough Road.

### **CE SH 13.9**

After Objective Blanchardstown 1

*Prepare an Urban Framework Plan for Blanchardstown Town Centre to guide and inform future development. This will include improvements to the urban fabric of the Town through the integration of public transport facilities and road corridors with increased density development and innovative building formats, which will have regard to changing retail patterns, the potential for high technology employment growth and the changing education, community and recreational needs of the Town's diverse population.*

### **CE SH 13.10**

Amend Local Objective 147 to state:

Ensure that crossing over the Liffey Valley SAAO to facilitate a future light rail transit system is designed in such a way as would not compromise the amenity, tourism and economic potential of the Valley

### **CE SH 13.11**

Rezzone OS to CI at the National Sports Campus.

# PART TWO

---

## Sheet 14: Green Infrastructure 1

### Submission received relevant to this sheet:

D00062

(Please see appendices for map based changes).

### Summary of Issues Received

One submission seeks the rezoning of land from 'RS' to 'OS' adjoining Lambay View, Clifflands, Rush to reflect that the area is used as open space, as identified on sheet 14. It therefore seeks to adjust sheets 6, 15 and 16 to show lands as OS. There is a lengthy planning history to this site.

### Chief Executive's Response

It is considered that the RS zoning, as per sheet 6, 15 and 16 should be retained and that sheet 14 is amended to reflect same, i.e. changed to an RS zoning form the OS zoning.

### Recommendation

#### **CE SH 14.1**

Change OS zoning on sheet 14 to RS to reflect RS zoning on sheets 6, 15 and 16 at this location.

# PART TWO

---

## Sheet 15: Green Infrastructure 2

### Submissions received relevant to this sheet:

D00062 D00495 D00628 D00692

(Please see appendices for map based changes).

### Summary of Issues

The submission from the Department of Arts, Heritage and the Gaeltacht seeks the inclusion of the Codling Fault Zone marine SAC (site code 003015) to GI map 2 (Sheet 15).

One submission from a quarry seeks to remove the Nature Development Area designation from Milverton Quarry on the basis that it is shown as a quarry in the Fingal Biodiversity Action Plan. One submission seeks the rezoning of land from 'RS' to 'OS' adjoining Lambay View, Clifflands, Rush to reflect that the area is used as open space. It seeks to adjust sheets 6, 15 and 16 to show lands as OS. There is a lengthy planning history to this site. One submission seeks the removal of the specific objective 'nature development area' from sheet 15 (part of existing Castleknock golf club lands).

### Chief Executive's Response

The Codling Fault Zone marine SAC was signed off by the Minister on 24 February 2016 under S.I. 99 of 2016, post the publication of the February 2016 Draft Development Plan. This area is 24 km off the Howth coast. It is to be referenced in Chapter 9 Natural Heritage, captured within Table BD01: Protected Areas of International and National Importance, with an asterisk that will state *'This area is not mapped on Green infrastructure 2 sheet 15 owing to the 24 km distance from shore but can be reviewed in SI 99 of 2016, 24 February 2016, as a map is attached. See [www.npws.ie](http://www.npws.ie).'*

Chapter 9 deals with Natural Heritage and under section heading Nature Development Areas, quarries are identified as Nature Development Areas. Milverton is one of these sites. It is also a County Geological Site.

It is considered that the RS zoning, as per sheet 6, 15 and 16 should be retained and that sheet 14 is amended to reflect same, i.e. changed to an RS zoning from the OS zoning.

The Nature Development Areas has been brought forward from the current Development Plan. These areas are locations where nature conservation can be combined with existing activities such as farming, forestry, quarrying and recreation (e.g. golf clubs). The areas and land-uses have been selected because of their existing or potential value for wildlife. These circumstances have not changed.

### Recommendation

No Change.

# PART TWO

---

## Sheet 16: Green Infrastructure 3

(Please see appendices for map based changes).

### **Submission received relevant to this sheet:**

D00062

### **Summary of Issues Received**

One submission seeks the rezoning of land from 'RS' to 'OS' adjoining Lambay View, Clifflands, Rush to reflect that the area is used as open space. It seeks to adjust sheets 6, 15 and 16 to show lands as OS. There is a lengthy planning history to this site.

### **Chief Executive's Response**

It is considered that the RS zoning, as per sheet 6, 15 and 16 should be retained and that sheet 14 is amended to reflect same, i.e. changed to an RS zoning from the OS zoning.

### **Recommendation**

No change.





# PART TWO

## Associated Submissions

### Fingal Housing Strategy (Draft Plan Appendix 1)

#### Submissions received relevant to this Section:

D00030 D00283 D00643

#### Summary of Issues Received

One submission references the need for affordable homes stating that there is a significant lack of suitable affordable housing in the Fingal area as witnessed by the vast amount of young families who are renting in the area and being crippled with huge unfair rent demands Fingal needs a more affordable housing for young families to grow up in and enjoy the benefits of its beautiful magnificent surroundings.

A submission from Balbriggan Community Council requests a fair and equal distribution of social-housing in every main town across Fingal and a stop to any further social-housing allocation to Balbriggan until all towns have an equal allocation. In addition this submission requests that social housing be spread amongst housing developments so that no single housing estate has more than an acceptable number of social housing units. This number should include properties of private investors who receive rental income through the social welfare system. This submission also requests preference for social housing be given to those on the housing list the longest and locally based.

A submission received from the Department of Housing, Planning Community and Local Government, seeks an objective in the Written Statement, of the Draft Development Plan, chapter 2, Core Strategy, Section 2.10 to state that the Housing Strategy is to be considered interim in nature, with a review undertaken within two years as part of the mandatory 2 year report on the progress of the Development Plan under section 15 (2) of the Act.

#### Chief Executive's Response

The issue of affordability is understood by Fingal County Council. Affordability and viability are two interlinked issues relating to the supply and delivery of housing. Fingal's Housing Strategy provides an affordability index across all incomes in the County. The need to reduce the cost of housing is on-going and efforts made by the Department of the Environment, through the establishment of the Dublin Housing Taskforce – to identify constraints to the supply and delivery of Housing across the county and city, is a priority for the Government. Fingal County Council sit on this Taskforce and every effort is being made by the Council to ensure that the cost of housing is reduced by ensuring that house-building is viable for builders by identifying infrastructural constraints to be overcome. The Department of Housing, Planning Community and Local Government commended Fingal County Council in its efforts, in this regard, in their Draft Development Plan.

At the time of writing the new Government's Housing Strategy is soon to be released and where practicable, any necessary changes will be made to the Fingal Housing Strategy.

The issue of the location of social housing schemes across the county can be a controversial matter. Given the current national emergency relating to housing supply and homelessness of families particularly for the Dublin area, housing families is a priority for Government and the Council. While the locations of these units are monitored, the key issue is the provision of housing to satisfy housing needs. Generally social housing provision will follow the preferred

## PART TWO

---

location of persons needing to avail of such need i.e. close to family, schools and ties with an area, etc. In the past social housing was largely provided by the Housing Authority for the area and house building took place, generally, on Council owned lands, in large swathes of what was termed council housing. This model was somewhat replaced with the introduction of Part V into the Planning and Development Acts, where social and affordable housing was mixed with private housing development thus providing mixed tenure and mixed incomes to housing estates. The housing model now is in transition where the method of the provision of social housing comes from a variety of sources, as set out in Fingal's Housing Strategy that includes, direct provision of social housing by the housing authority, Approved Housing Bodies provision, acquisition by Housing Authorities of residential units, leasing by Housing Authorities of private properties and the provision of private properties used by social housing tenant on supports such as HAP and RAS etc. The current, urgent and pressing need for the Council is to provide social housing to ensure that social housing needs are met, preferably in the location where they arise, reduce numbers in emergency accommodation and prevent homelessness.

This Department of Housing, Planning Community and Local Government recommendation regarding the interim nature of the Housing Strategy is accepted and captured under Chapter 2, Core Strategy, refer.

### **Recommendation**

No change.

# PART TWO

---

## Record of Protected Structures (Draft Plan Appendix 2)

### Submissions received relevant to this Section:

D00512, D00583

### Summary of Issues Received

One submission seeks to list both Knockmaroon House and Glenmaroon House as separate entities on the Record of Protected Structures Sheet 13 Blanchardstown.

One submission seeks to designate Church Avenue as an ACA as the Cottages and the building which houses the Thai Garden (former St Brigid's Seminary) and the recently restored Parochial House (Cunninghams) are important to the environment of the Protected Structure (St Brigid's Parish Church).

### Chief Executive's Response

Both of these houses, Knockmaroon House and Glenmaroon House have been given separate entries on the Record of Protected under the current proposals to amend the Record of Protected structures as advertised on 31<sup>st</sup> May 2016.

The submission to designate this area has been dealt with under Chapter 10 Cultural Heritage, where an examination of this proposed ACA along with two others will be considered, during the lifetime of the Development Plan, under Objective CH 28, which states: *'Identify any potential new ACAs and evaluate and modify existing ASAs where necessary during the lifetime of the plan.'*

### Recommendation

No change.

# PART TWO

---

## Other

### **Submissions received relevant to this Section:**

D00010, D00621, D00617.

### **Summary of Issues**

One submission seeks the ability to use links within the electronic version of the Development Plan for ease of access.

One submission seeks the inclusion of an Index as part of the content of the Development Plan along with a number of formatting suggestions.

One submission discusses the level of implementation of Development Plan objectives by Fingal County Council.

### **Chief Executive's Response**

Fingal County Council notes the suggestion made regarding the electronic Development Plan. The Council is constantly monitoring and improving the levels of accessibility of Council documents that it uploads to its website including the Development Plan.

The final Development Plan document will have an index provided.

The implementation level of Development Plan objectives can vary depending on funding, resources, timing and unforeseen issues. The current Development Plan of 2011 – 2017 and the last few years of the previous Development Plan 2005 – 2011 are and were in force at a time of significant austerity measures that impacted local authorities greatly throughout the country. All Development Plans including objectives, are reviewed and monitored, after two years following adoption at which time the level of implementation or otherwise is assessed

### **Recommendation**

No change.

# PART TWO

---

## Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA)

### Submissions received relevant to this Section:

D00051 D00052 D00577 D00692

### Summary of Issues

The EPA notes that environmental considerations have been integrated into the preparation of the plan through the inclusion of many robust environmental objectives. EPA also note the following: the need to take account of the of SEA, Habitats and Flood Directives in the preparation of future local area plans; the need to ensure that the potential for cumulative effects particularly in relation to water quality, biodiversity and noise pollution is taken into account in relation to the key infrastructure proposed in the Draft Plan including Metro North, Metro West, Dublin Airport, Port/Harbour development; coastal walking and cycling routes and coastal defence; the need to ensure that full account is taken of all licence conditions for the EPA-licensed landfill (W127-01) in the strategic development location proposed at Dunsink; the fact that while the Environmental Report states that only Rush South Beach failed to achieve sufficient water quality status a recent EPA publication has also reported that Loughshinny Beach has failed in this regard. In addition EPA also suggest that consideration be given to including in the Plan a summary of the key changes in the environmental baseline from the previous plan period.

It was outlined that a copy of the SEA Statement to be developed in line with Schedule 2A of the SEA Regulations should be sent to the EPA on adoption of the Plan.

The Eastern and Midland Regional Authority acknowledges that the Draft Plan is generally consistent with the Greater Dublin Area Regional Planning Guidelines (RPGs) and raises the following issues: consideration should be given to whether zoned lands identified in the SFRA and listed in Objective SW07 comply with the requirements of the justification test contained in the OPW's 'Planning System and Flood Risk Assessment Guidelines for Planning Authorities (2009)' because it is unclear that this is the case; a review of proposed amendments contained in the Environmental Report to objectives in the Draft Plan which were not incorporated into the Draft Plan should be undertaken and a clear justification for non-inclusion of same should be provided where this has not already been done; Justification for the inclusion of development lands at Lissenhall should be provided given that the Natura Impact Statement [sic] identified lands at Lissenhall as prone to flooding and as having a direct connection with Rogerstown Estuary SAC and SPA.

Councillor David Healy raises the following issues: the SEA does clearly identify the impacts of the Draft Plan; the SEA is out of date as it was written before the enactment of the Climate Action and Low Carbon Development Act and the Paris Agreement; an emissions analysis should have been done and included in the SEA; the Draft Plan should be amended to include a target for emissions reduction for the County, provisions for reporting on progress in this regard and a process of engagement with citizens, businesses and civil society; the SEA does not refer to specific targets included in the Government's transport policy document *Smarter Travel* and therefore did not inform the Draft Plan in this regard; clarity is requested in relation to the phrase "maximum sustainable potential" in relation to Objective ED30 with reference to the aviation sector and Dublin Airport.

# PART TWO

---

## DAHG

The Department of Arts, Heritage and the Gaeltacht welcomes the strong protection given to natural heritage in the Draft Plan including proactive steps to protect biodiversity. The following issues were raised: certain objectives, (including but not restricted to Swords 11, Donabate 4, Malahide 6, Malahide 8 and Malahide 11) have the potential to impact negatively on biodiversity and designated sites and it is not clear that they have been adequately assessed in the SEA and appropriate assessment (AA); the inclusion of habitats and species both within and without designated sites is requested under SW07 Objective 1 (Biodiversity, Flora and Fauna) in Table 7.1 – Strategic Environmental Objectives (SEOs) of the Environmental Report; the Department disagrees with the positive ratings for some Malahide Objectives contained in the matrix in Appendix B of the Environmental Report; cumulative impacts have not been given adequate consideration and seem to have only been considered in the matrix in Appendix B of the Environmental Report and in Section 4.8 of the Natura Impact Report which does not mention any projects; Natural Heritage Areas (NHAs) have not been included in Figure 9.1 of the Environmental Report; Table 9.1 of the Environmental Report which deals with strategic policies details only positive impacts whereas the accompanying text describes some negative impacts; the presence of brown trout in the rivers mentioned in Section 6.2.1.6 of the Environmental Report needs to be noted; the River Liffey needs to be included in Section 6.5.1.2 of the Environmental Report which deals with rivers; Table 5.2 of the SEA Environmental Report should be amended to refer to the Wildlife Acts 1976 to 2012; site -specific conservation objectives have not been used in the Natura Impact Report as advised by the Department; concerns are raised in relation to the use of a 15km zone of influence in considering impacts on European sites which has led to certain projects (such as the proposed project to bring water to the Dublin region from the Shannon) being omitted from consideration.

## **Chief Executive's Response**

### EMRA

Objective SW07 requires the implementation of the Planning System and Flood Risk Management Guidelines. Specific areas which will require further investigations are highlighted. All these areas also subject to a LAP or Masterplan which will address all potential sources of flood risk and demonstrate compliance with the aforementioned guidelines.

In relation to proposed amendments contained in the Environmental Report to Objectives which were not incorporated into the Draft Plan these will be reviewed and the results of this review will be included in an Addendum to the SEA Environmental Report which will be included in the SEA Statement.

Lissenhall provides development potential in the Swords area (identified as a key town in the Regional Settlement Hierarchy) which is an attractive location for the delivery and purchase of housing in recent times. The development of the Lissenhall lands is dependent on the provision of a Local Area Plan, the delivery of adequate water services (Swords WWT) and upgraded/planned public transport infrastructure (Metro North as outlined in the Governments Infrastructure and Capital Investment Plan 2016-2021).

The development of lands at Lissenhall will only be considered as part of a phased development approach. The Local Area Plan lands will be subject to a detailed flood risk assessment to address potential flood risk, proposed mitigation measures and assign appropriate land uses.

### EPA

The points raised in relation to any future LAPs are noted and these plans will be developed in fulfilment of the requirements of the SEA, Habitats and Flood Directives. The SEA process for the

## PART TWO

---

Draft Plan has taken cumulative effects into consideration in relation to water quality, biodiversity and noise pollution. The Draft Plan outlines the potential for lands at Dunsink as a strategic landbank for Fingal and commits to undertake a comprehensive study of these lands (also referenced in Objective Blanchardstown 12 in Chapter 4 Urban Fingal) and to the preparation of an LAP in due course. Objective Blanchardstown 12 notes the presence of a landfill adjacent to these lands and states that the study shall investigate mitigation measure that may be required to address the impacts of the landfill site on the development lands. This states that any future development will have to take full account of potential impacts to the environment and human health from development in proximity to a landfill; an addendum to the SEA Environmental Report will be included in the SEA Statement and additional information will be included in relation to Loughshinny Beach. The inclusion of a section in the Plan that details key changes in the environmental baseline in comparison with the previous plan period has been considered but is not feasible due to a lack of environmental data in line with the timeframe involved which therefore precludes the development of an accurate baseline.

Cllr. David Healy

In relation to SEA both Chapter 8 and Chapter 9 of the Environmental Report, together with Appendix B of the Environmental Report, provide an assessment of impacts on the environment. The SEA Environmental Report complies with the requirements of the Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the SEA Directive) and national legislation (S.I. 435/2004, the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. 436/2004) as amended. An Addendum to the SEA Environmental Report will be included in the SEA Statement and it will include reference to the Climate Action and Low Carbon Development Act and the Paris Agreement. The Addendum will also refer to EU 2050 transition goals. An emissions analysis for Fingal would be beneficial and this will be undertaken in the context of the development of a mitigation and adaptation plan for Fingal. This plan will be developed within the framework which is currently being developed by the four Dublin local authorities. In relation to the targets set out in *Smarter Travel* the ongoing SEA process will include a consideration of these targets and this will be included in an Addendum to the SEA Environmental Report which will be included in the SEA Statement. In relation to aviation the ongoing SEA process will include a consideration of the decarbonisation trajectory in the Paris Agreement in relation to Objective ED30 and this will be included in the Addendum to the SEA Environmental Report.

DAHG

It is not accepted that objectives in the Draft Plan have not been adequately assessed in the SEA and AA processes. The SEA Environmental Report complies with the requirements of the Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (the SEA Directive) and national legislation (S.I. 435/2004, the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. 436/2004) as amended. Every policy and objective has been assessed in the SEA Environmental Report and in the Natura Impact Report (NIR). Chapters 8 and 9, together with Appendix B, of the SEA Environmental Report provide an assessment of impacts on the environment. In addition Chapter 10 includes both the SEA mitigation and the AA mitigation measures together with Chapter 4 of the NIR which provides detail on AA impact assessment and mitigation.

An Addendum to the SEA Environmental Report will clarify the issue raised in relation to Table 7.1 Strategic Environmental Objectives (SEOs) of the Environmental Report and the table will be updated to ensure clarity.

# PART TWO

---

Appendix B of the SEA Environmental Report has both a positive and negative rating in the Table under Biodiversity, Flora and Fauna but the accompanying text only reflects positive impacts. This text will be updated to reflect the potential negative impacts of the relevant Malahide objectives in the Addendum to the SEA Environmental Report. Cumulative impacts have been discussed in Chapter 9 of the SEA Environmental Report and specifically in Figure 9.2 which identifies the sensitivity of the environment. In addition Chapter 5 of the SEA Environmental Report provides an overview of other relevant plans and programmes. An Addendum to the SEA Environmental report will include text relating to the potential cumulative impacts from other projects. The NIR refers to the Greater Dublin Drainage Project, currently underway. The NIR will to be updated to include consideration of progress with this project and any other relevant projects including the Dublin Water Supply Major Source Development Project. Figure 9.1 of the SEA Environmental Report will be updated to include NHAs and will be included in the Addendum to the SEA Environmental Report as part of the SEA Statement. Table 9.1 of the SEA Environmental Report will be updated to reflect negative impacts and this update will be included in an Addendum to the SEA Environmental Report to be located in the SEA Statement. Both the reference to brown trout in the rivers mentioned in Section 6.2.1.6 of the Environmental Report and the River Liffey mentioned in Section 6.5.1.2 of the Environmental Report will be included in the Addendum to the SEA Environmental Report to be located in the SEA Statement. Table 5.2 of the SEA Environmental Report will be updated to include a reference to the Wildlife Acts 1976 to 2012. This text will be included in the Addendum to the SEA Environmental Report in the SEA Statement. The Natura Impact Report (NIR) contains a specific section on Conservation Objectives (Section 4.4) and each individual European Site has been reviewed in light of its Conservation Objectives contained in Table 4.6. The 15 km zone of influence distance was considered to be acceptable to screen all likely significant effects that might arise as a result of the implementation of the Draft Plan. The NIR will however be updated to include consideration of the Dublin Water Supply Major Source Development Project.

## **Recommendation**

No change.

# APPENDICES



- Appendix A:** Maps of Chief Executive's Recommendations
- Appendix B:** Development Plan Timeline
- Appendix C:** List of all Submissions Received
- Appendix D:** List of Prescribed Bodies

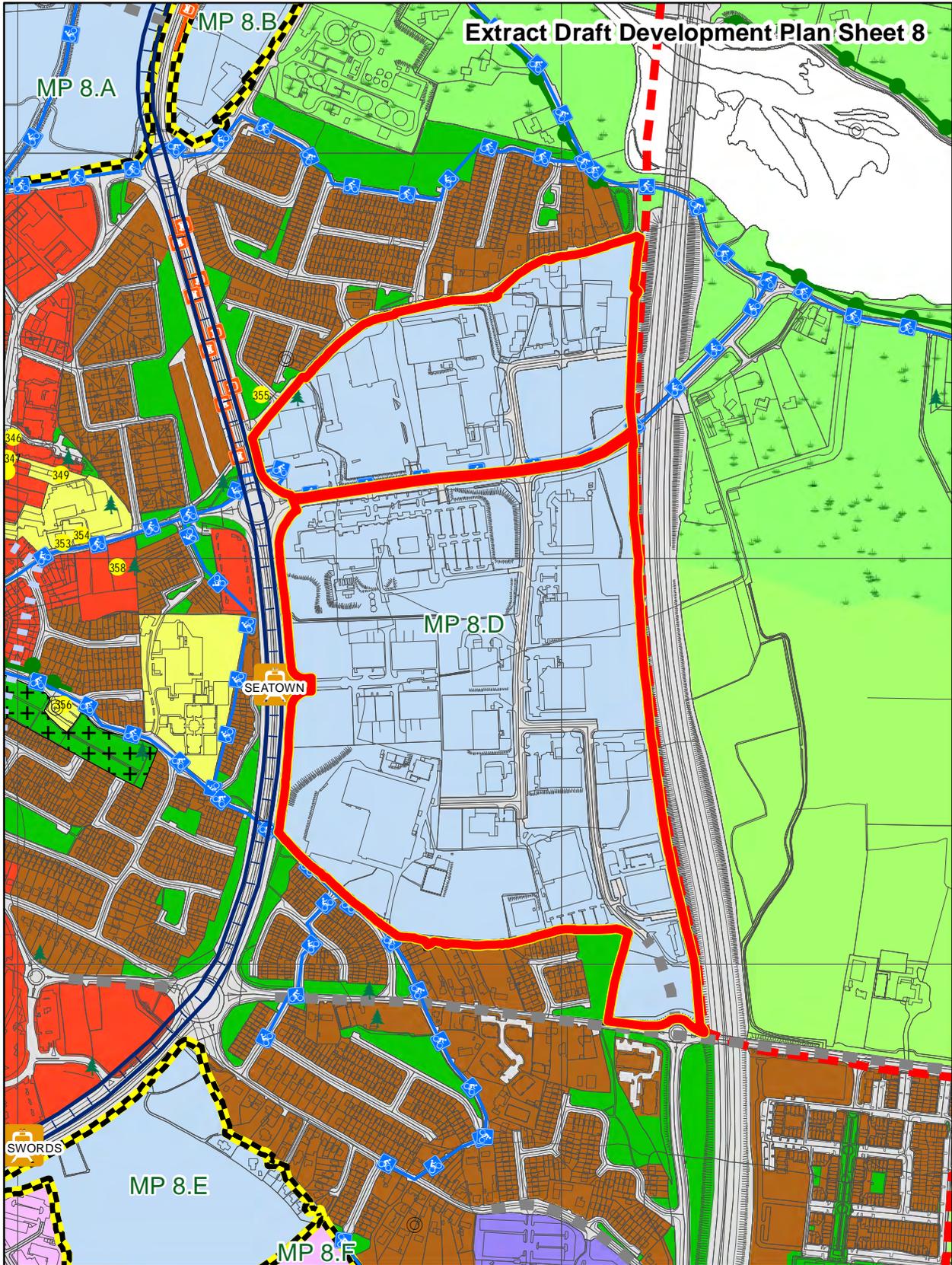


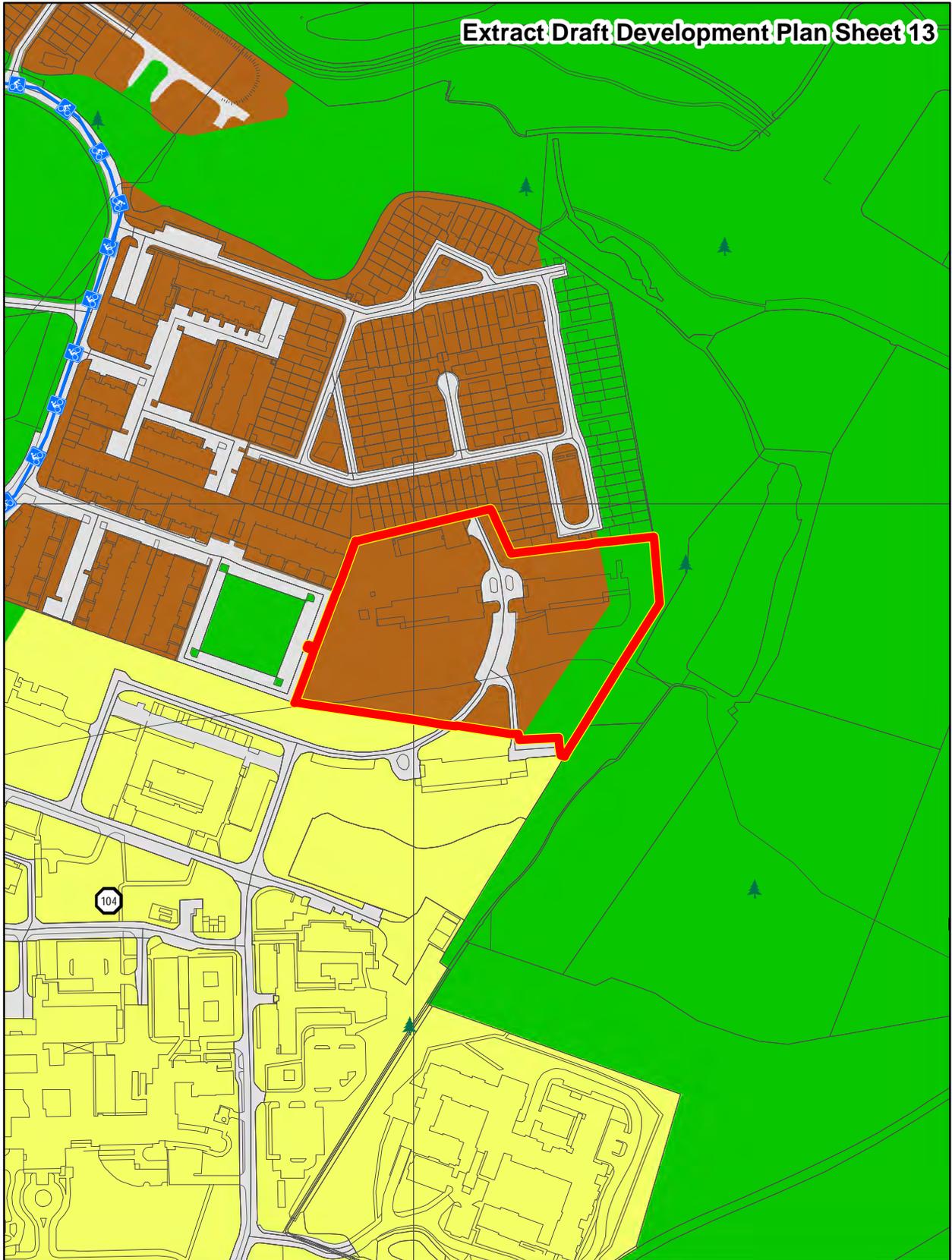
# APPENDIX A



## MAPS OF CHIEF EXECUTIVE'S RECOMMENDATIONS





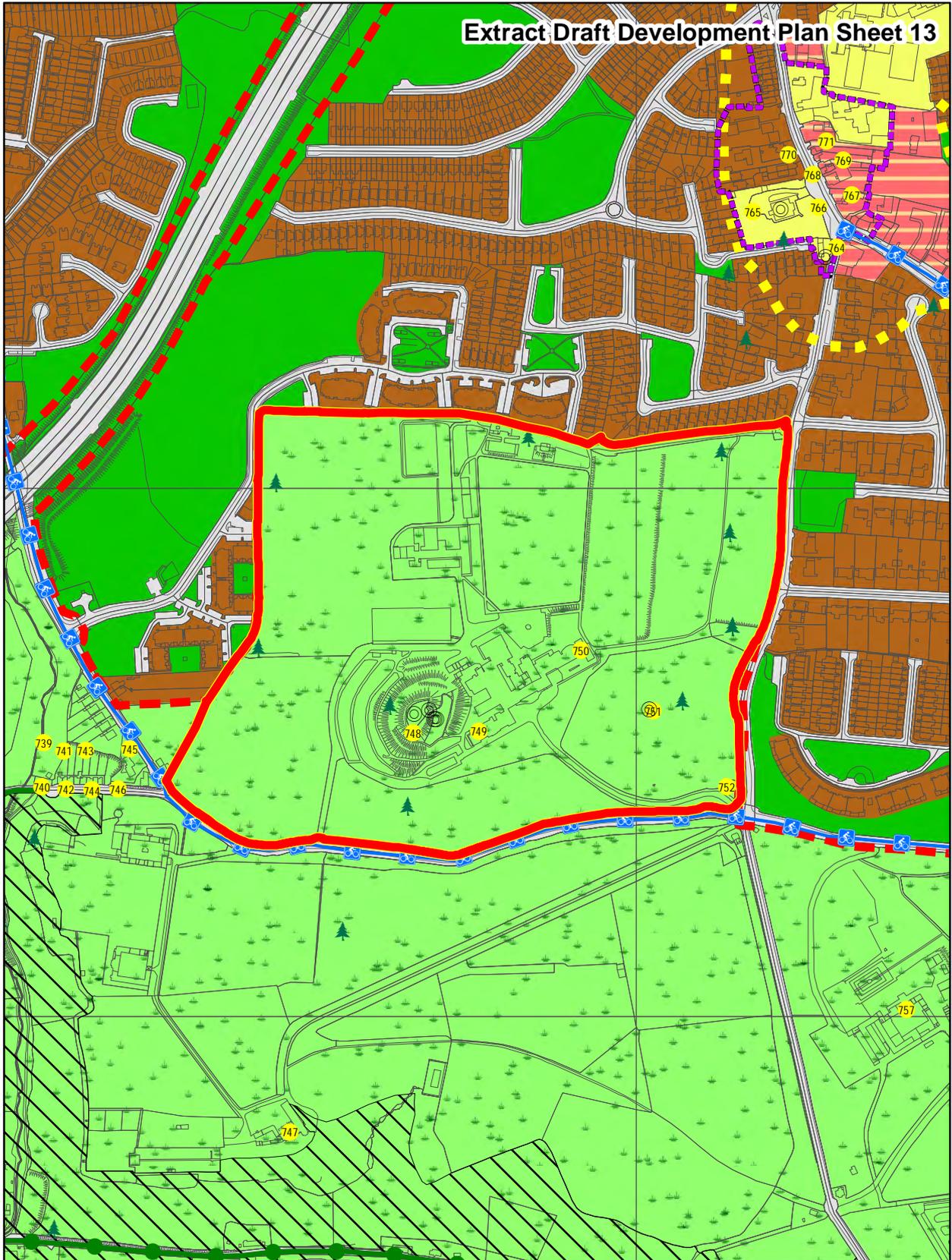


0 30 60 120 180 240 300 360 420 480 Meters



**CE CH 4.5 and CE SH 13.1**



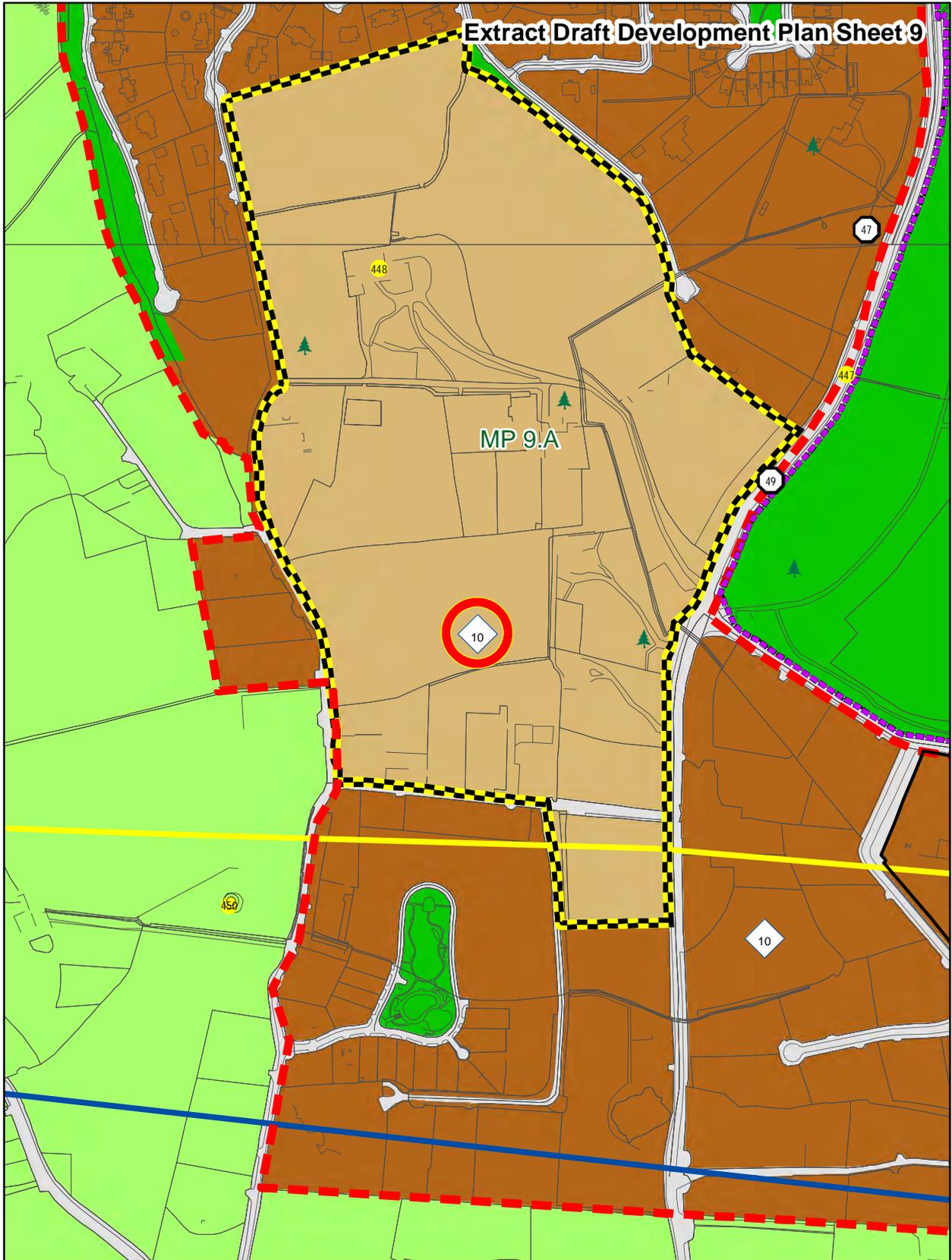


0 55 110 220 330 440 550 660 770 880 Meters



**CE CH 4.7**



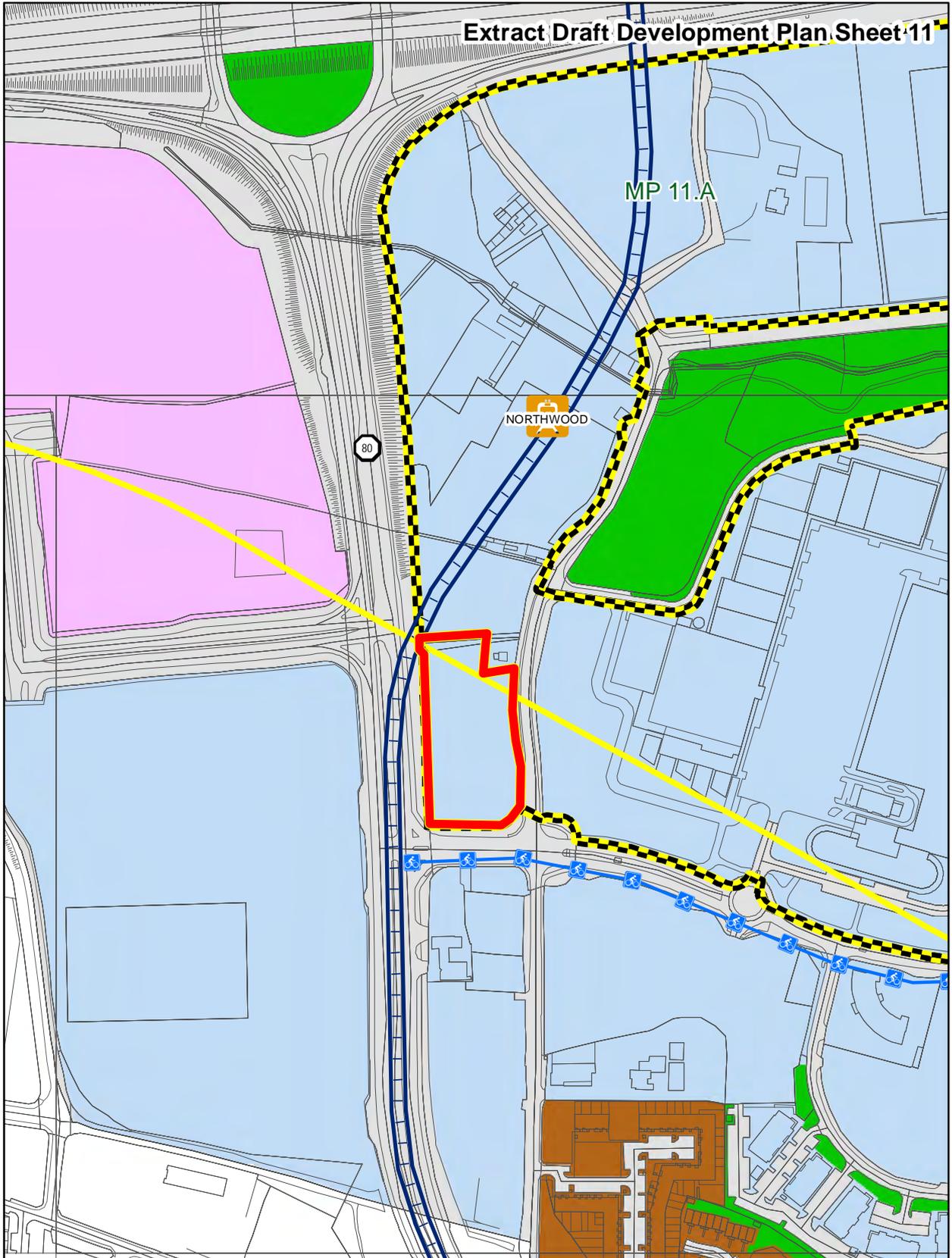


0 40 80 160 240 320 400 480 560 640 Meters



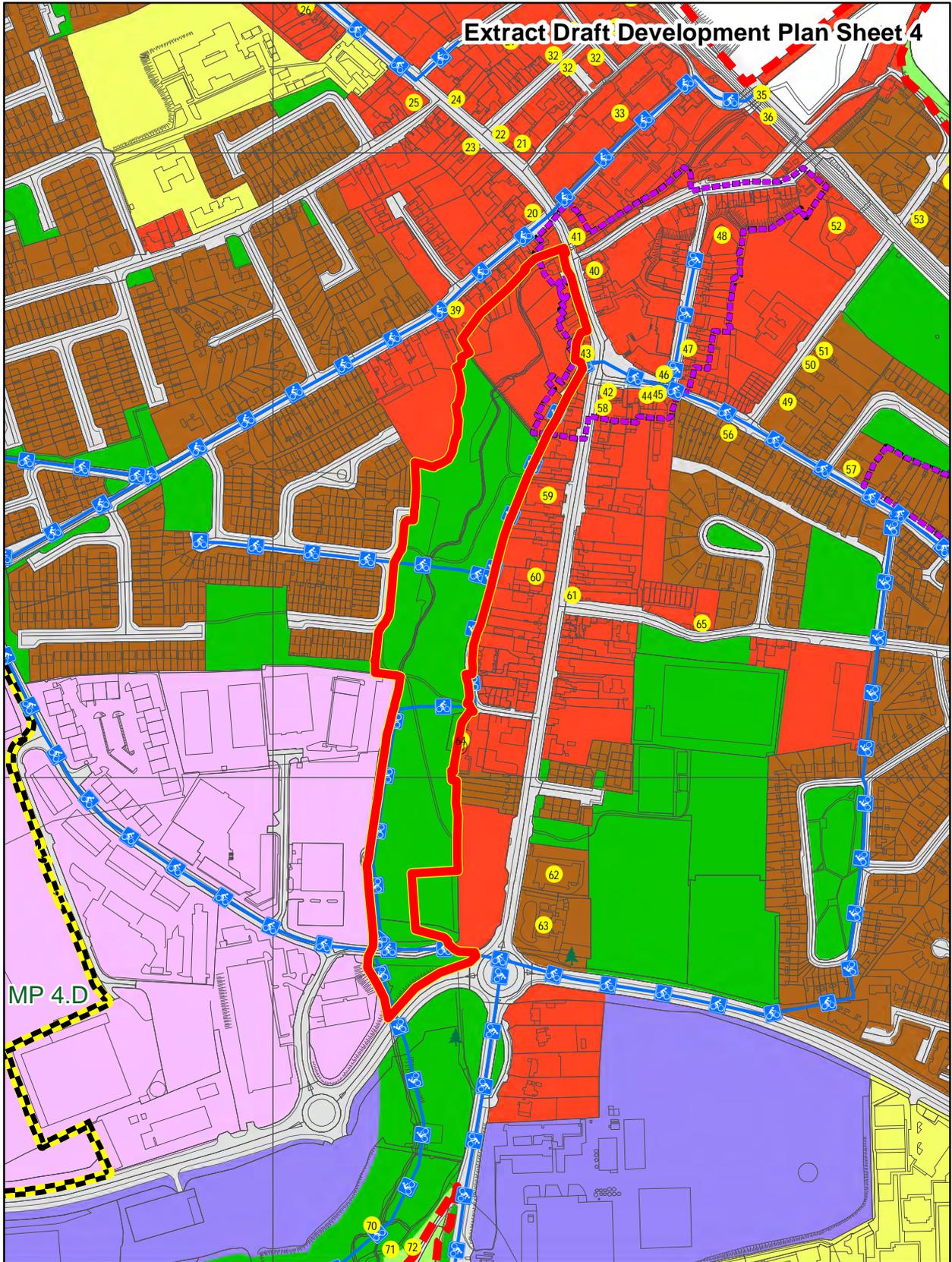
CE CH 4.9 and CE SH 9.7





CE CH 4.10 and CE SH 11.4





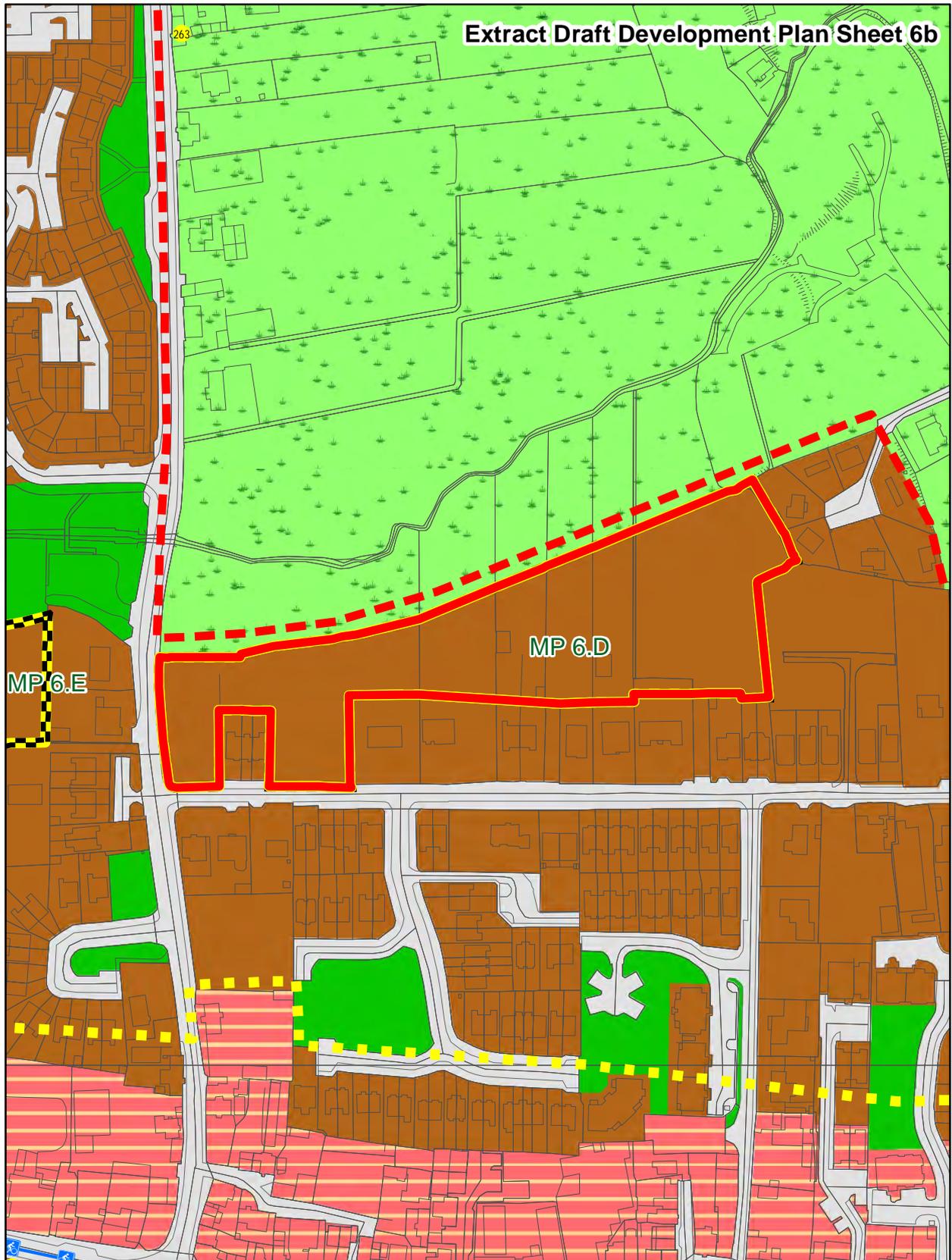
0 45 90 180 270 360 450 540 630 720 Meters



**CE CH 4.13**



# APPENDIX A



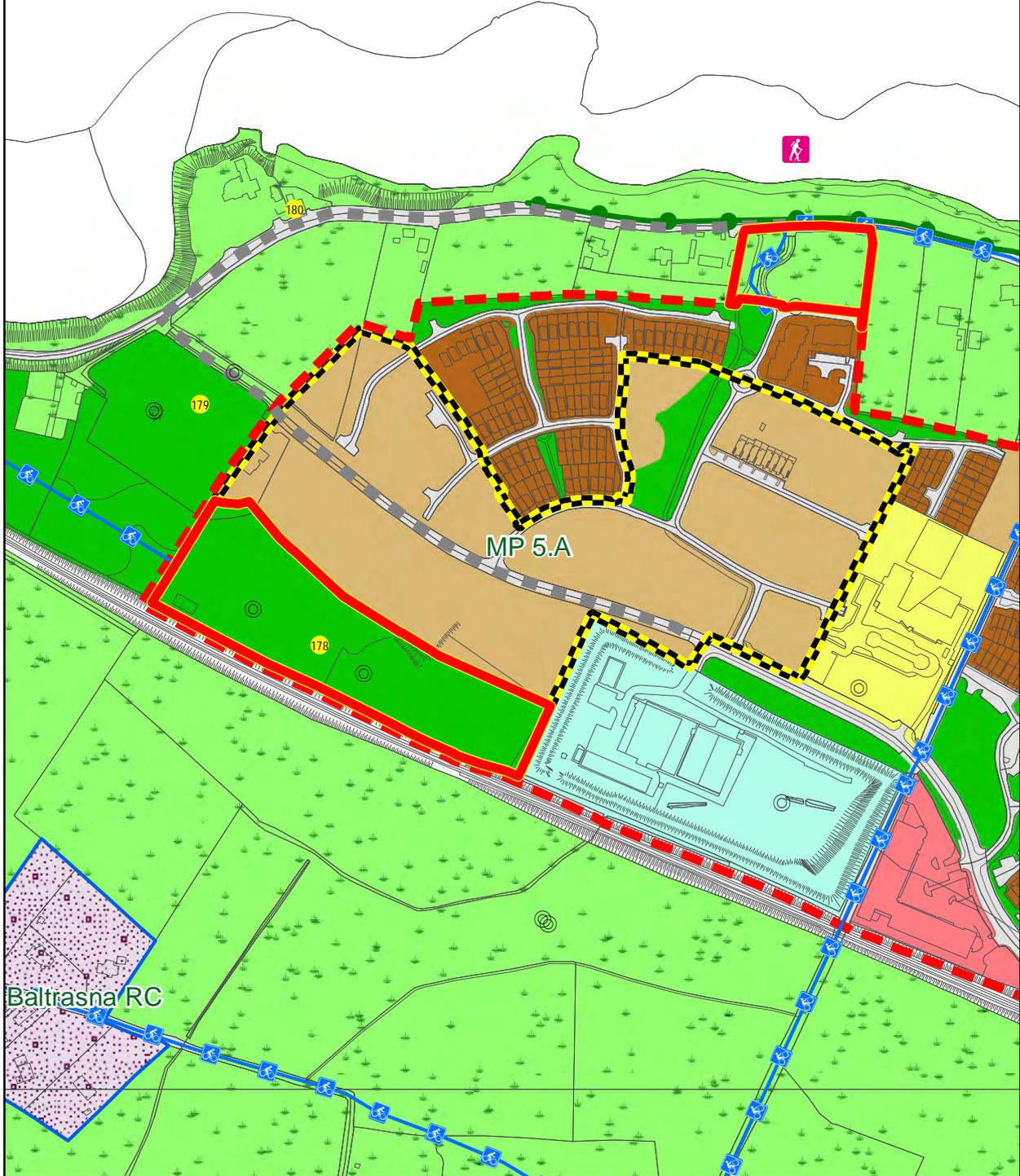
0 20 40 80 120 160 200 240 280 320 Meters



**CE CH 4.19 and CE SH 6b.1**



## Extract Draft Development Plan Sheet 5

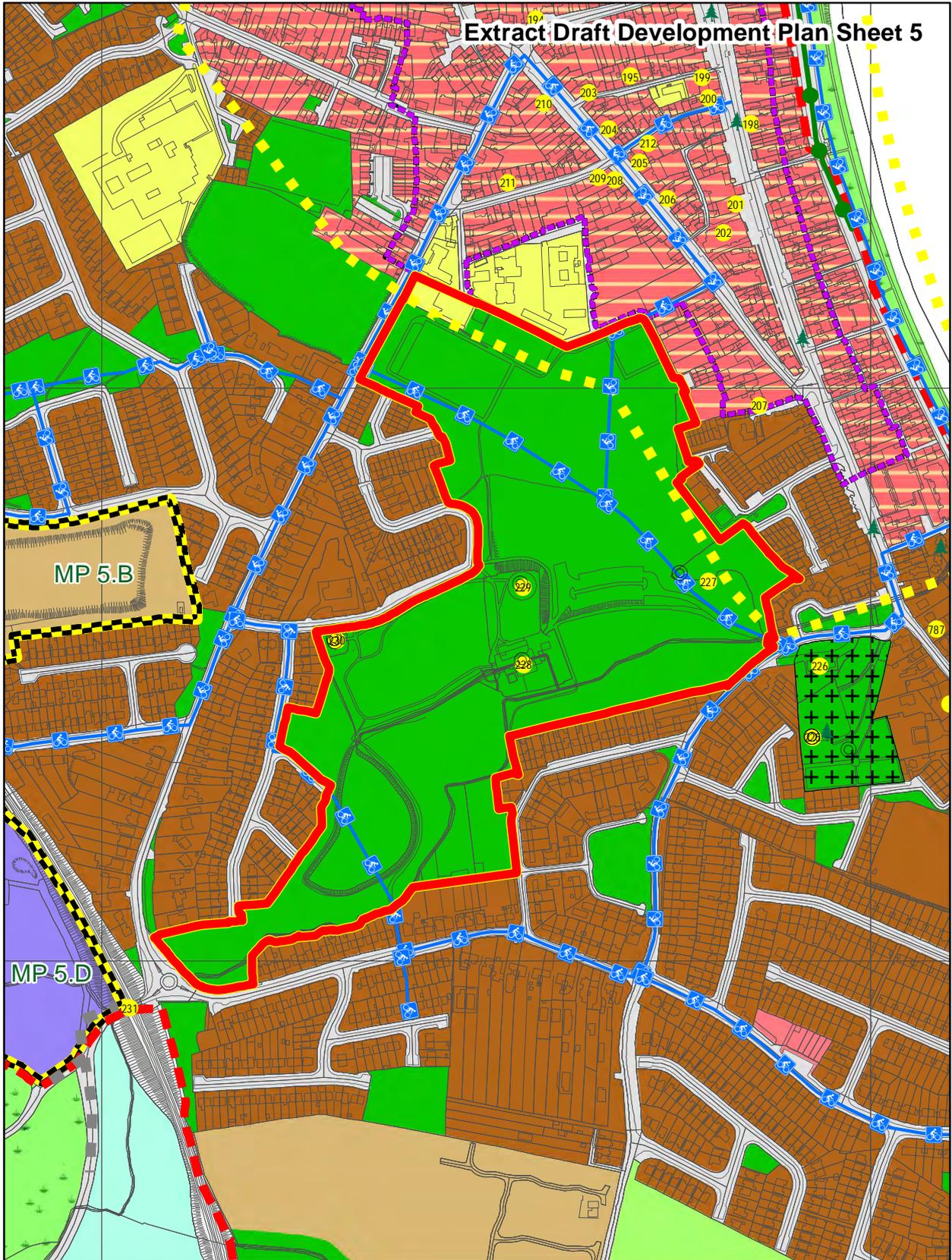


0 40 80 160 240 320 400 480 560 640 Meters



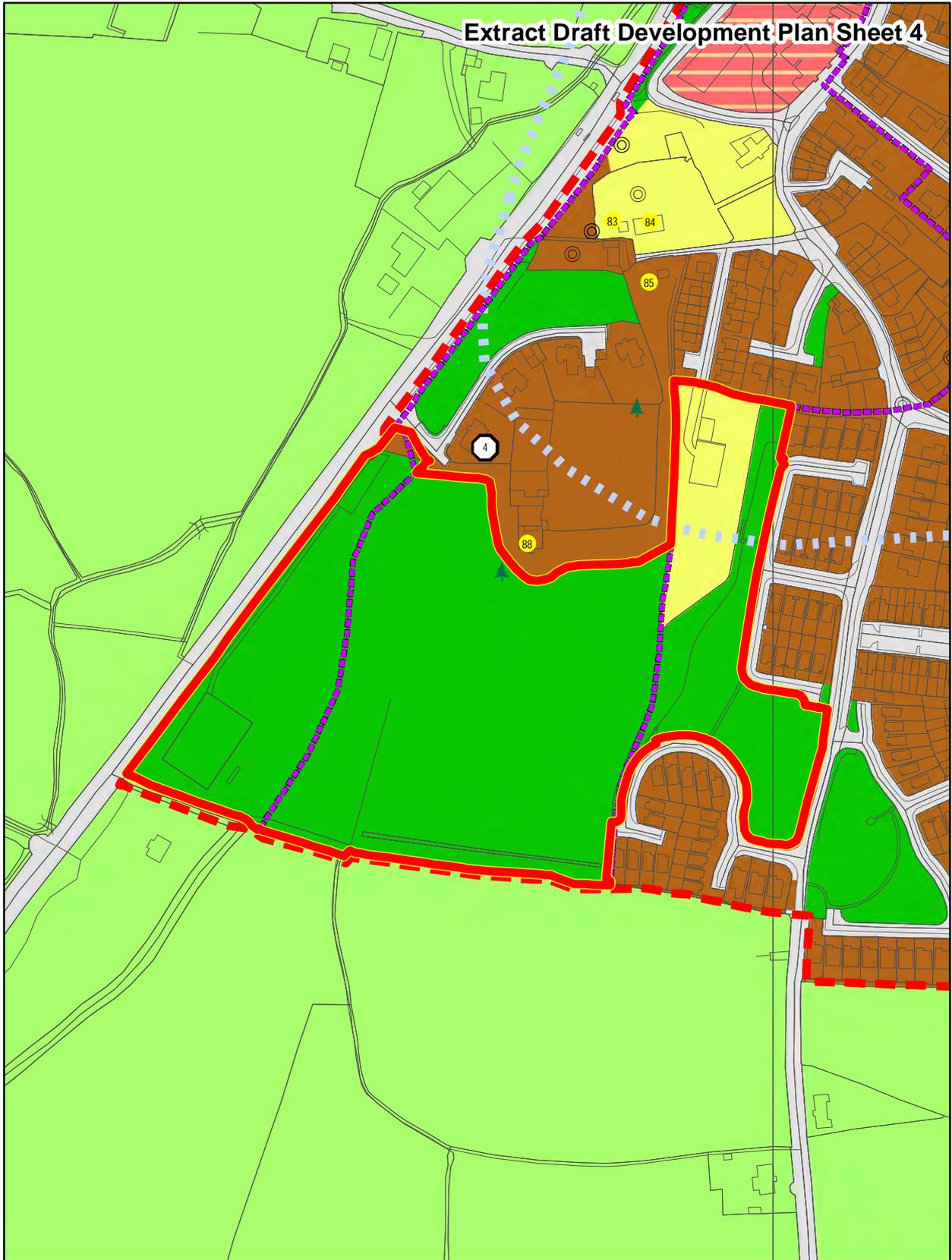
**CE CH 4.24 and CE SH 5.3**





**CE CH 4.29**



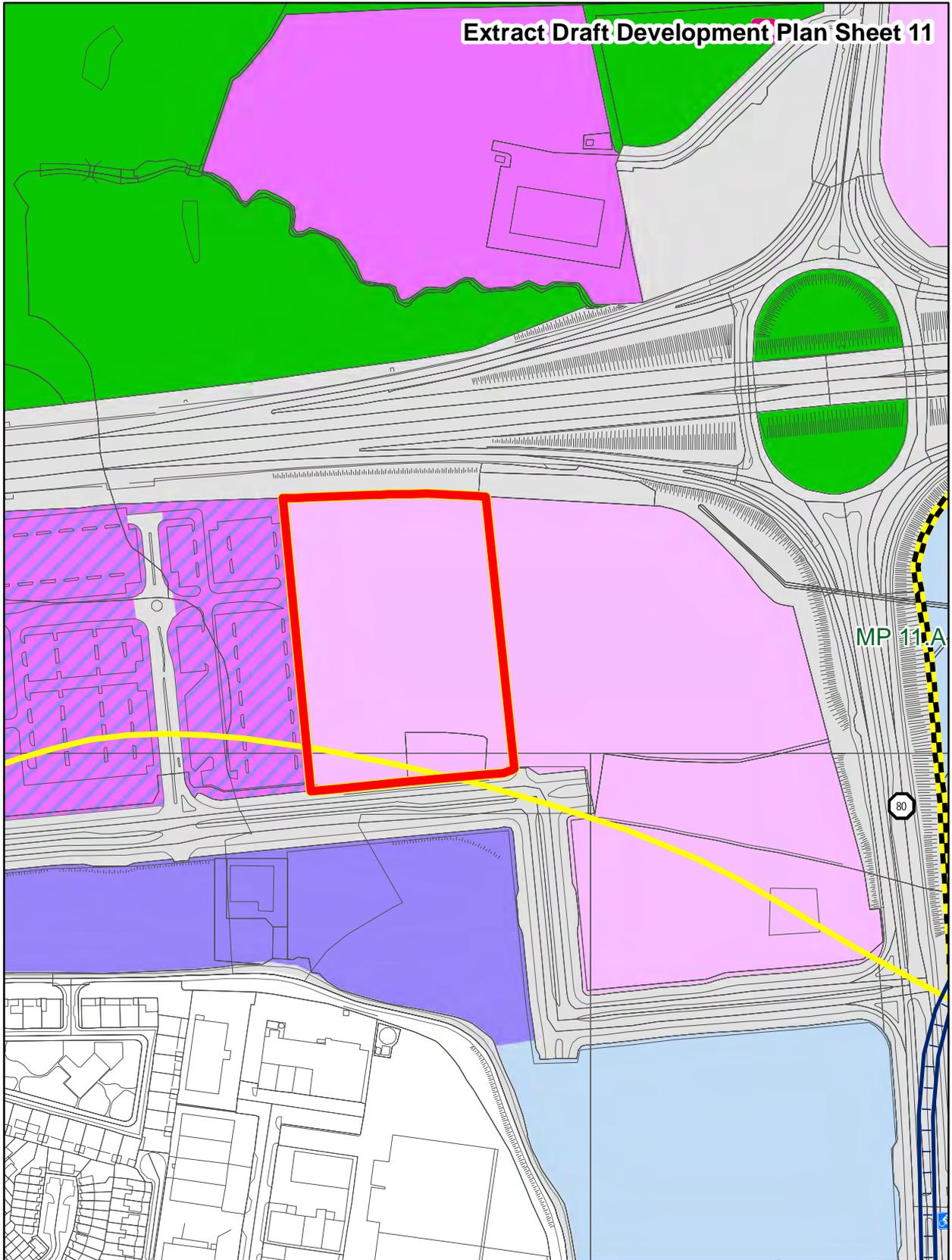


0 30 60 120 180 240 300 360 420 480 Meters



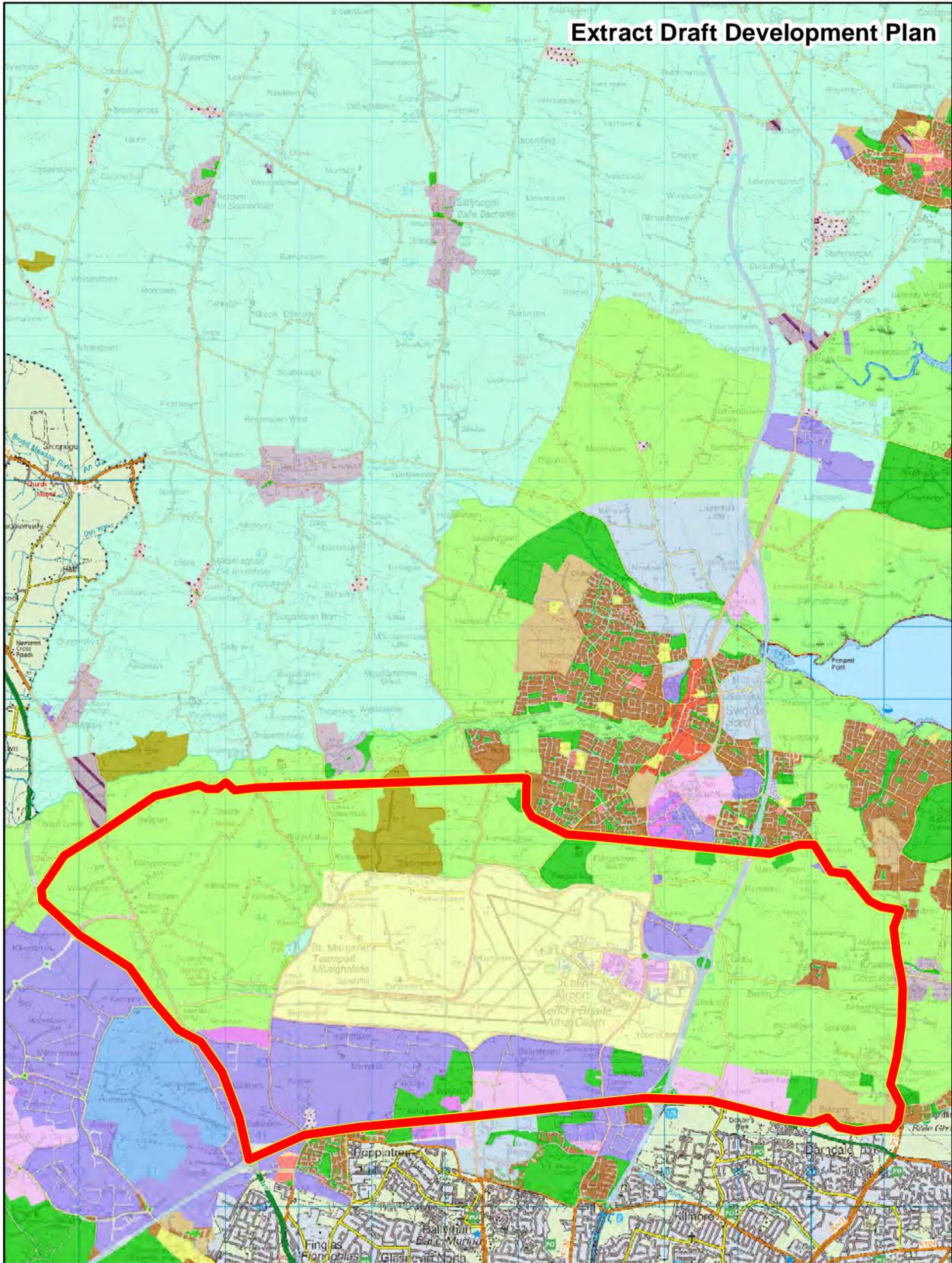
**CE CH 4.32**





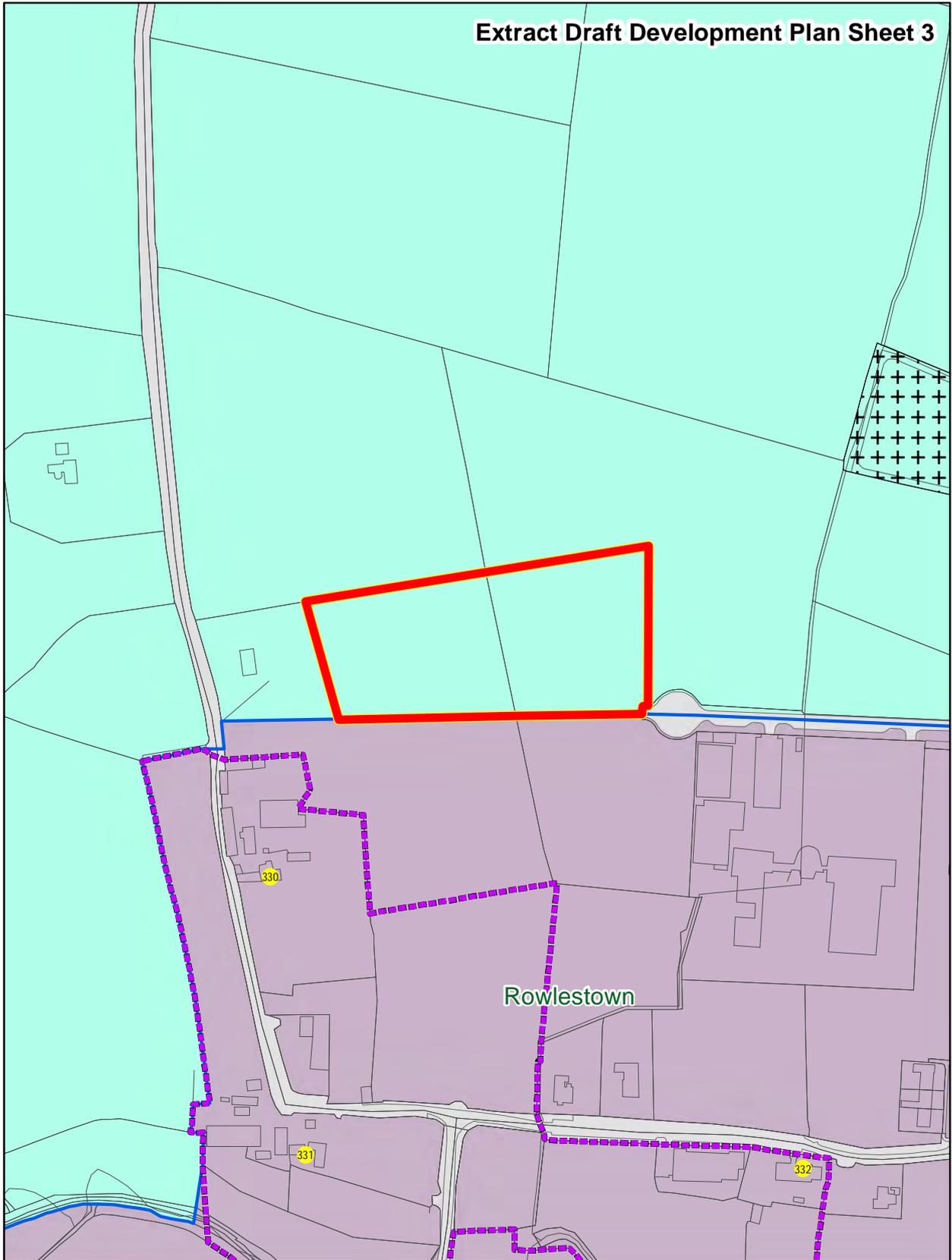
**CE CH 6.6**





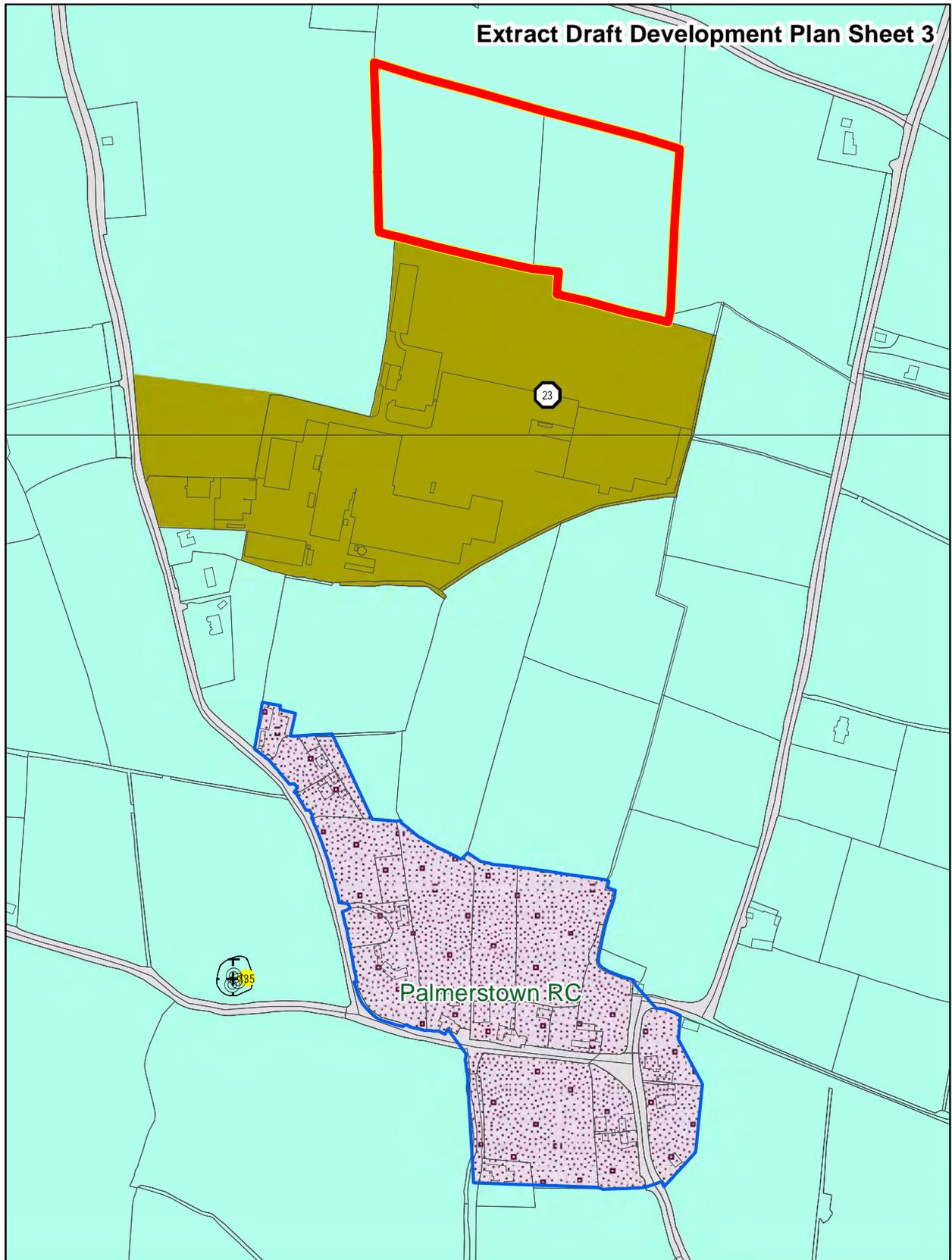
**CE CH 7.10**





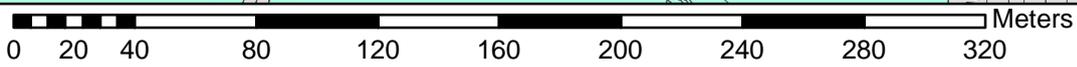
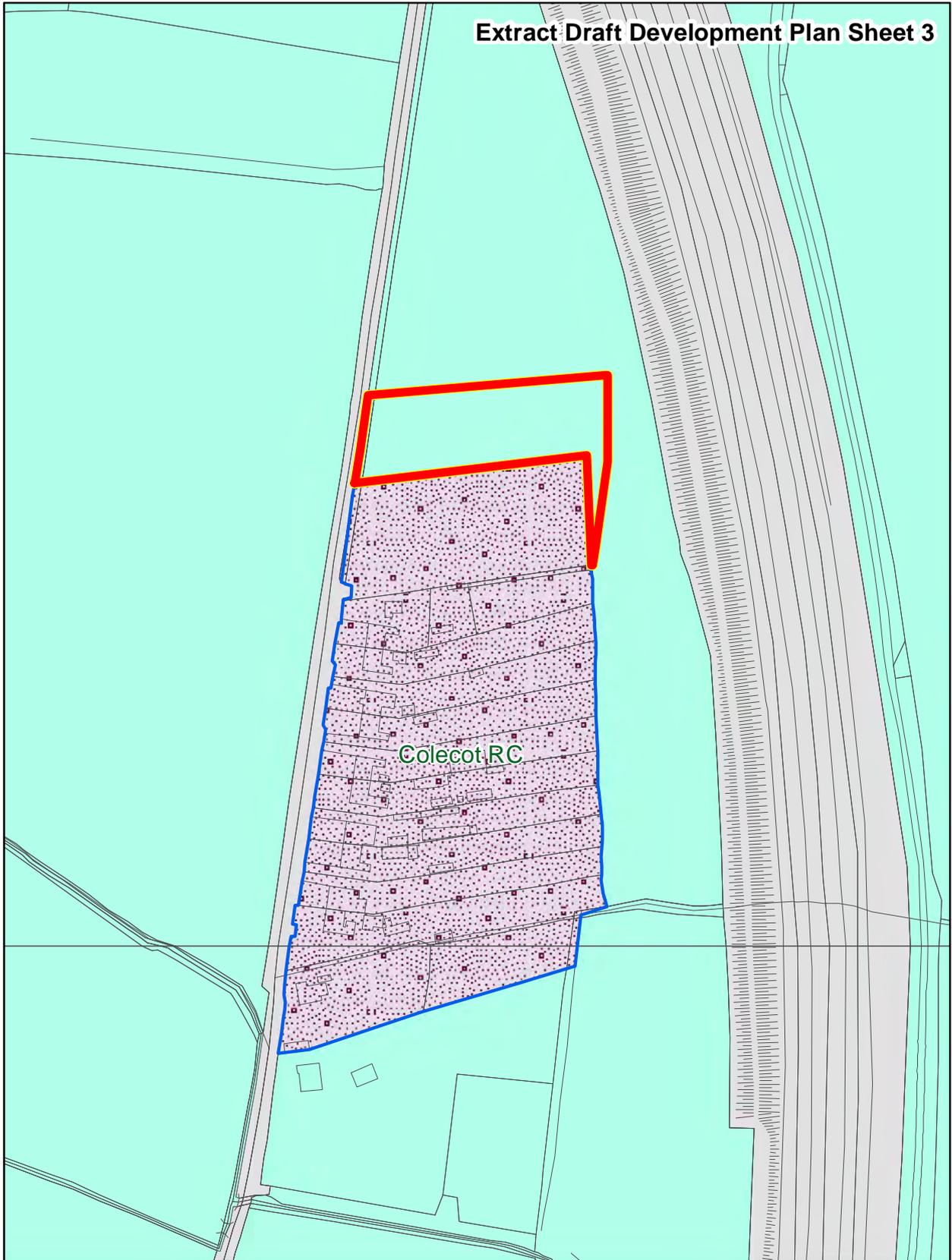
**CE SH 3.1**





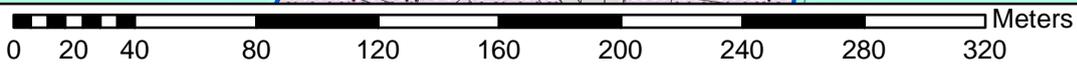
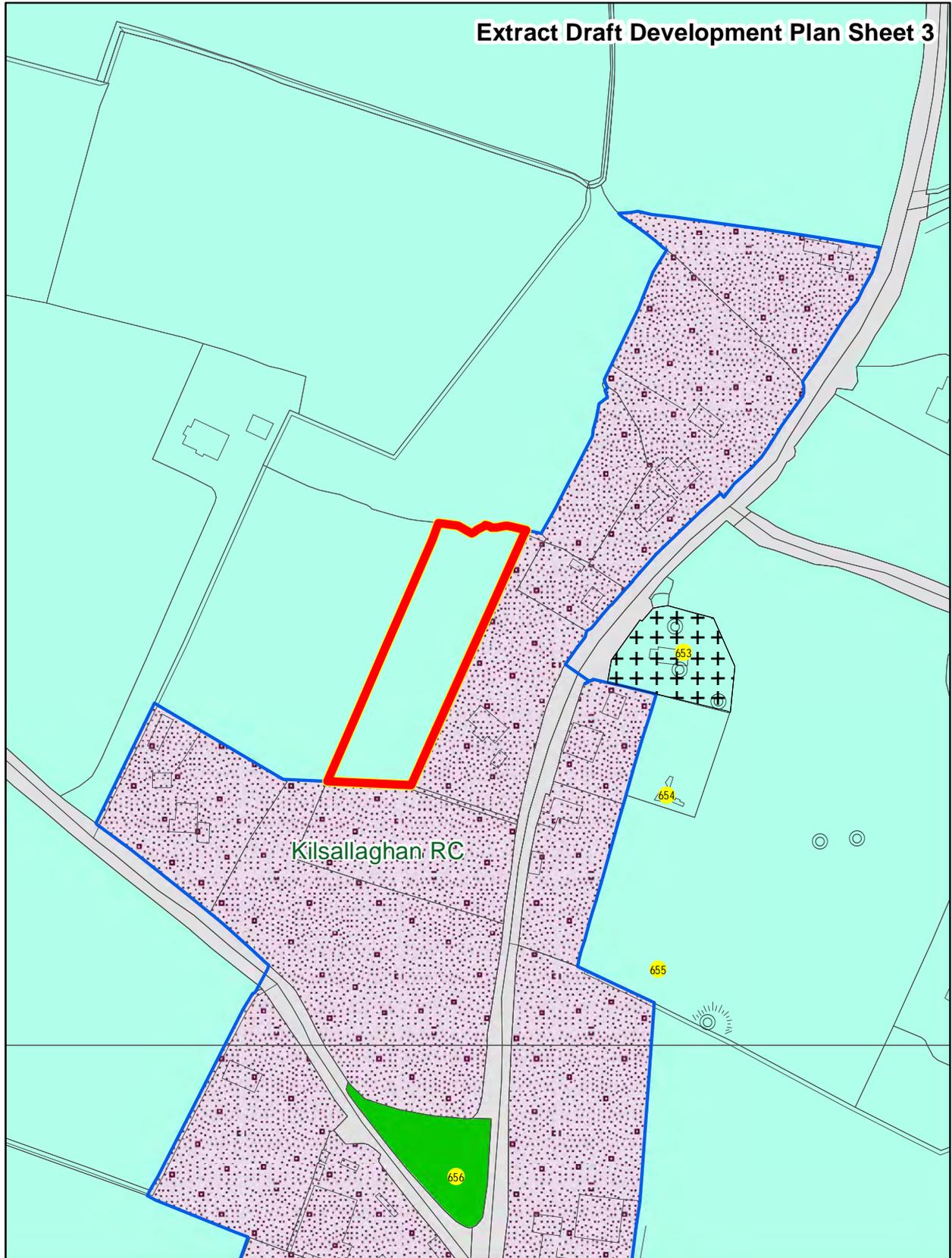
**CE SH 3.2**





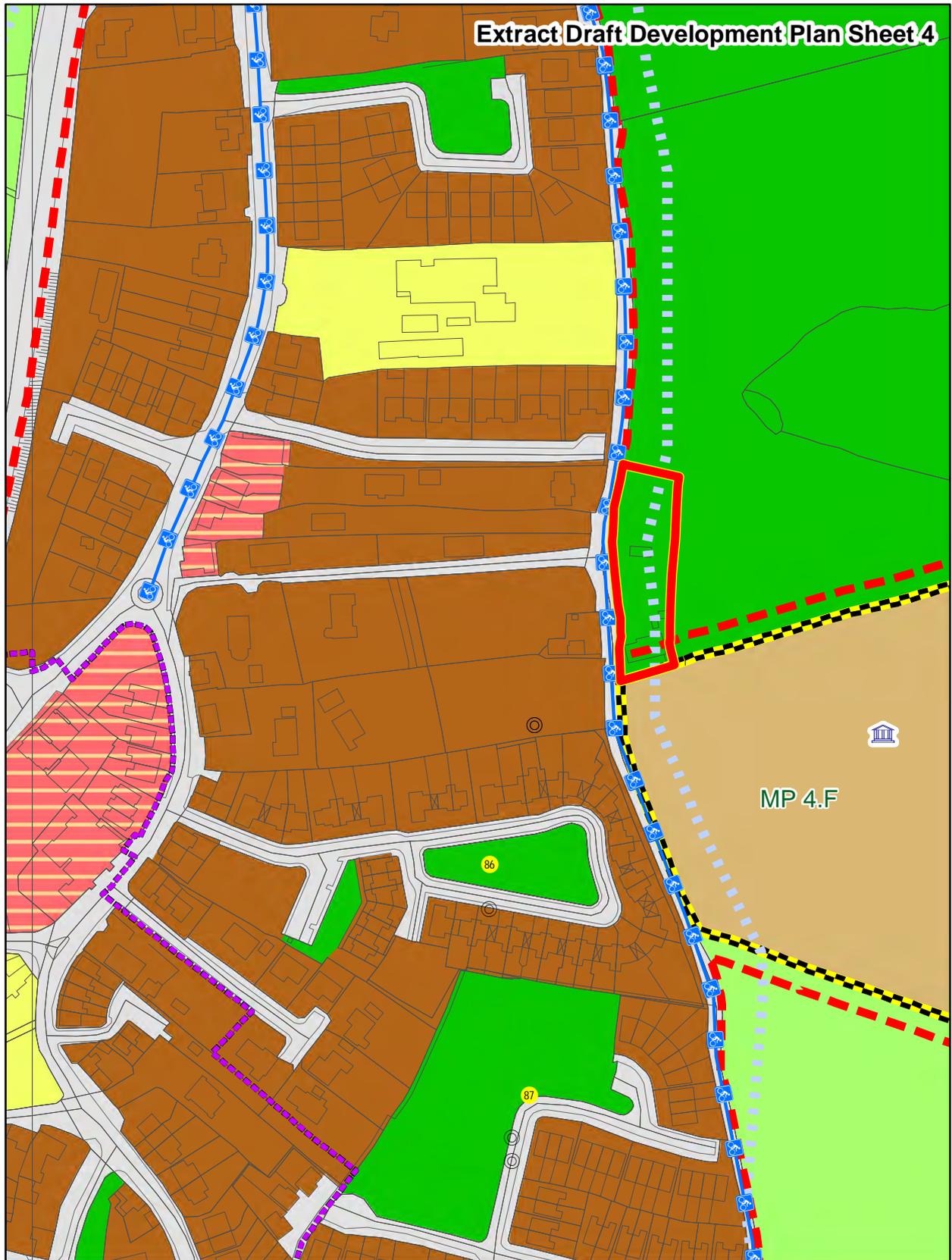
**CE SH 3.3**





CE SH 3.4



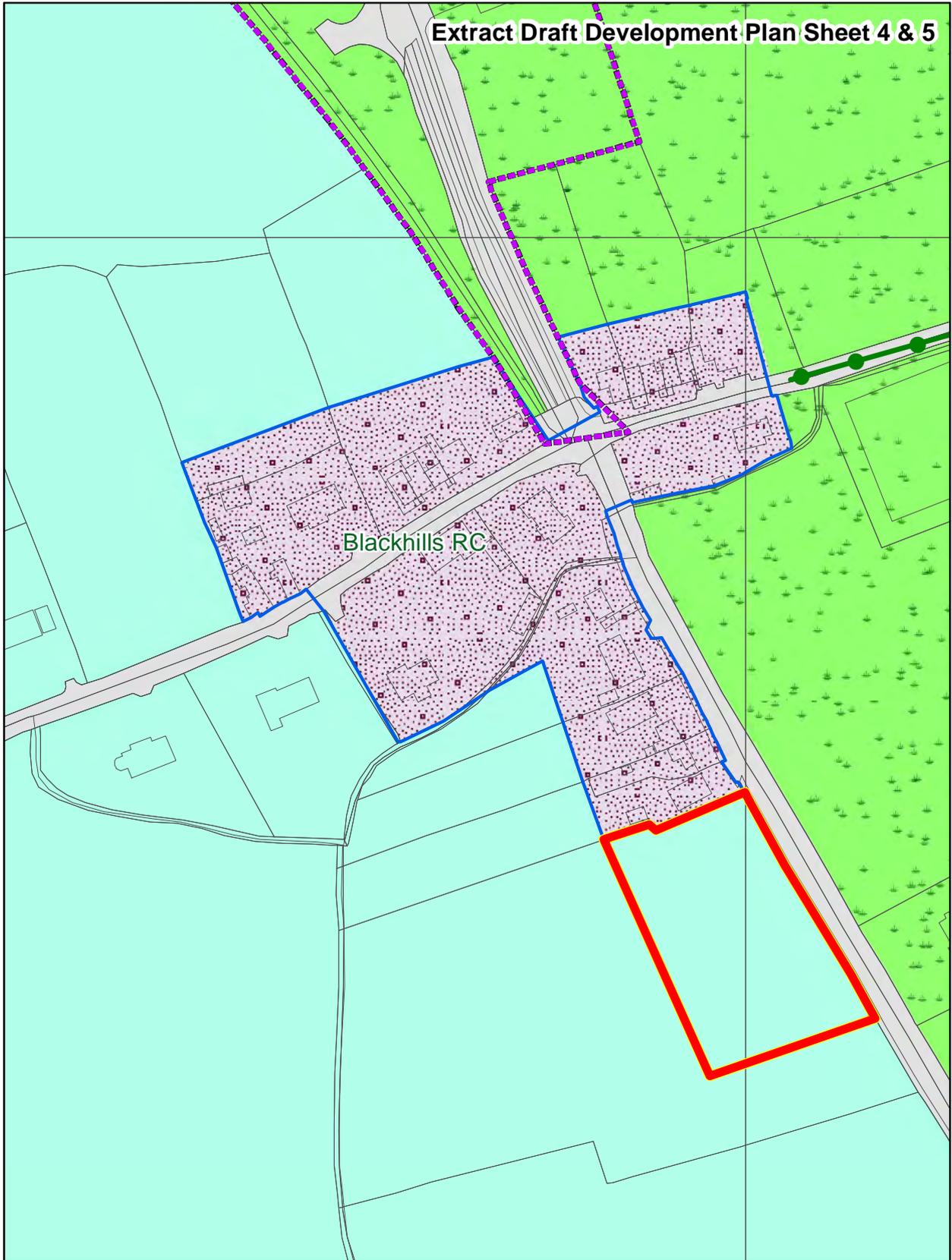


0 20 40 80 120 160 200 240 280 320 Meters



**CE SH 4.1**



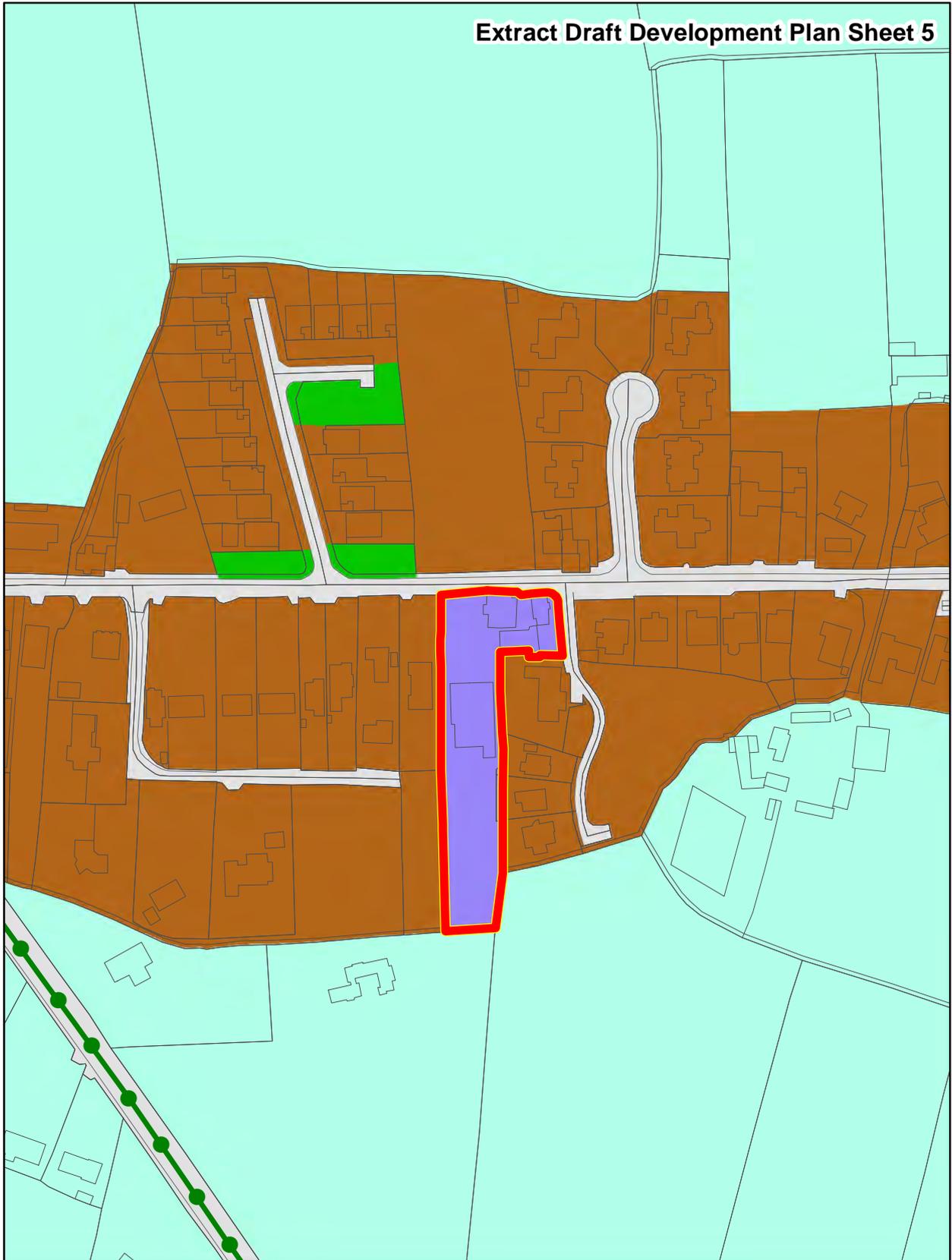


0 15 30 60 90 120 150 180 210 240 Meters



**CE SH 4.2**





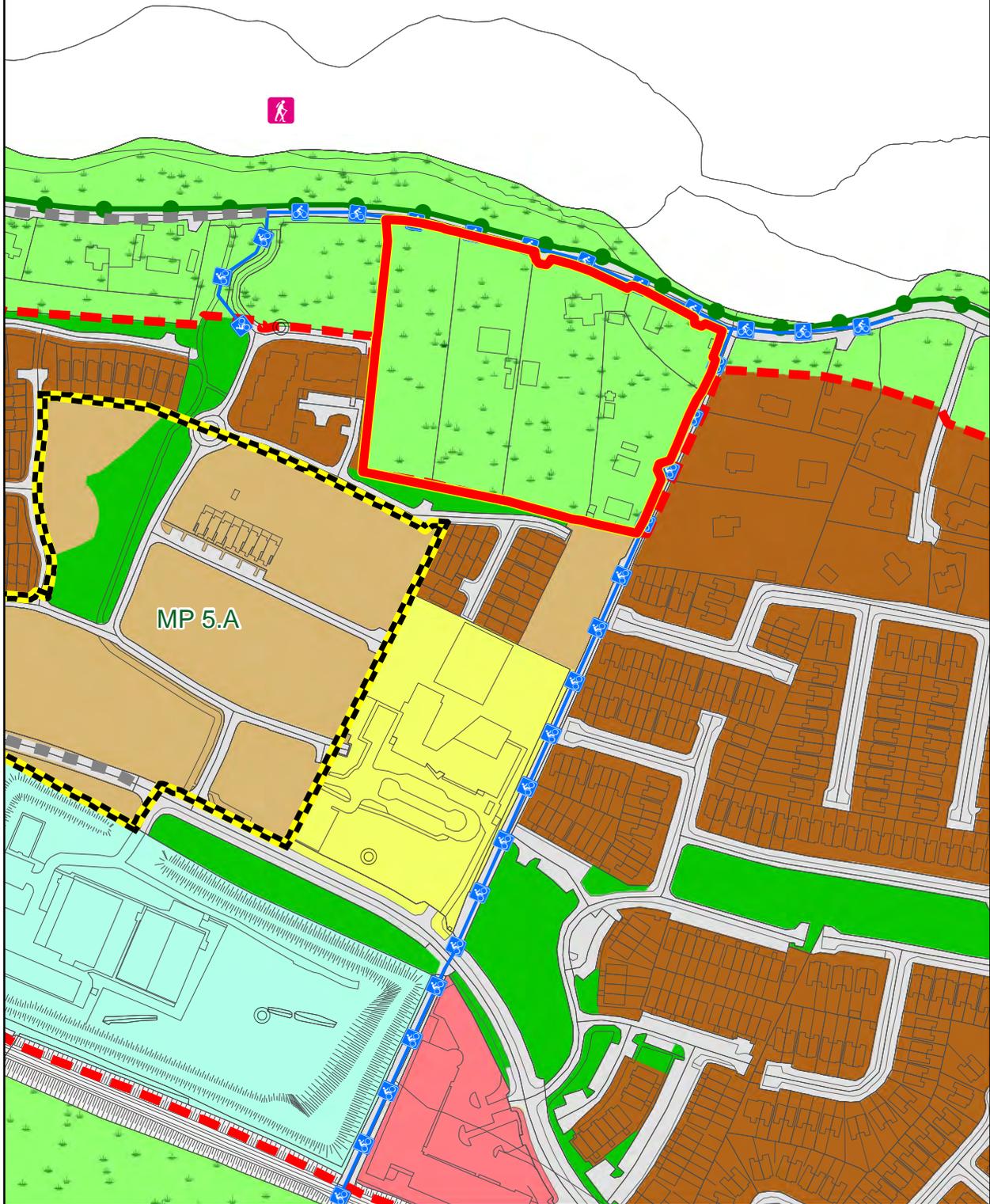
0 20 40 80 120 160 200 240 280 320 Meters



**CE SH 5.1**



## Extract Draft Development Plan Sheet 5



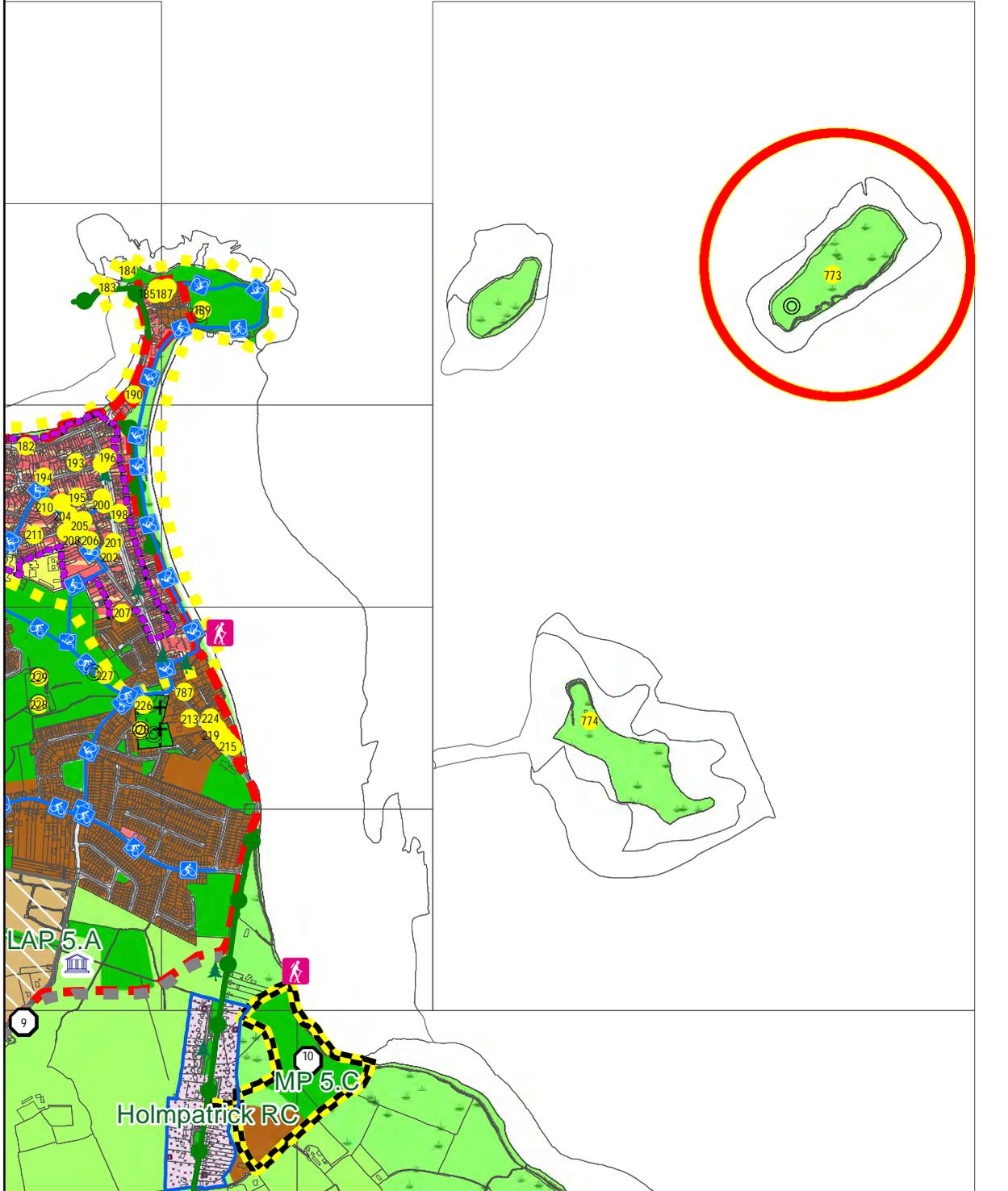
0 30 60 120 180 240 300 360 420 480 Meters



**CE SH 5.2**



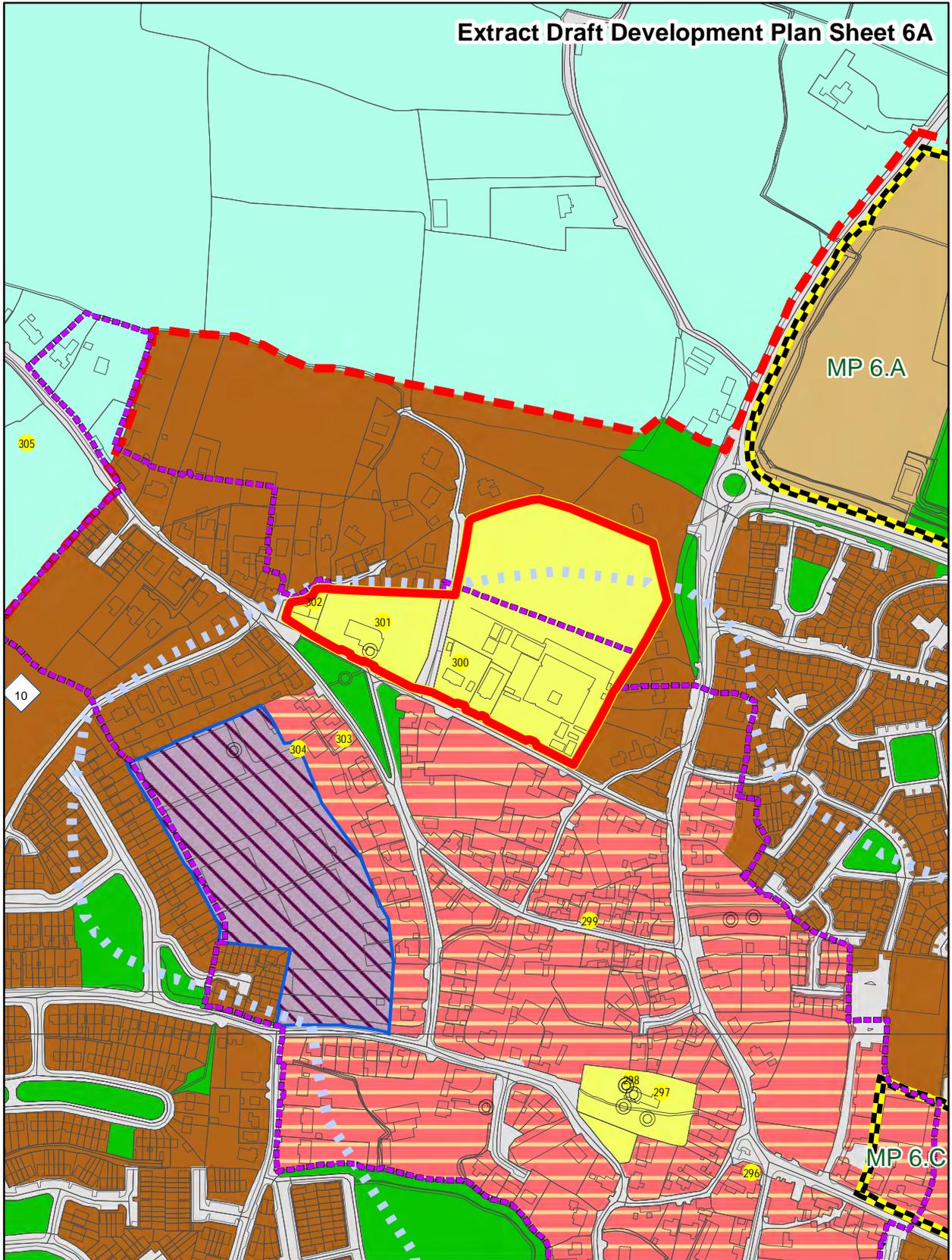
## Extract Draft Development Plan Sheet 5



**CE SH 5.4**



# APPENDIX A



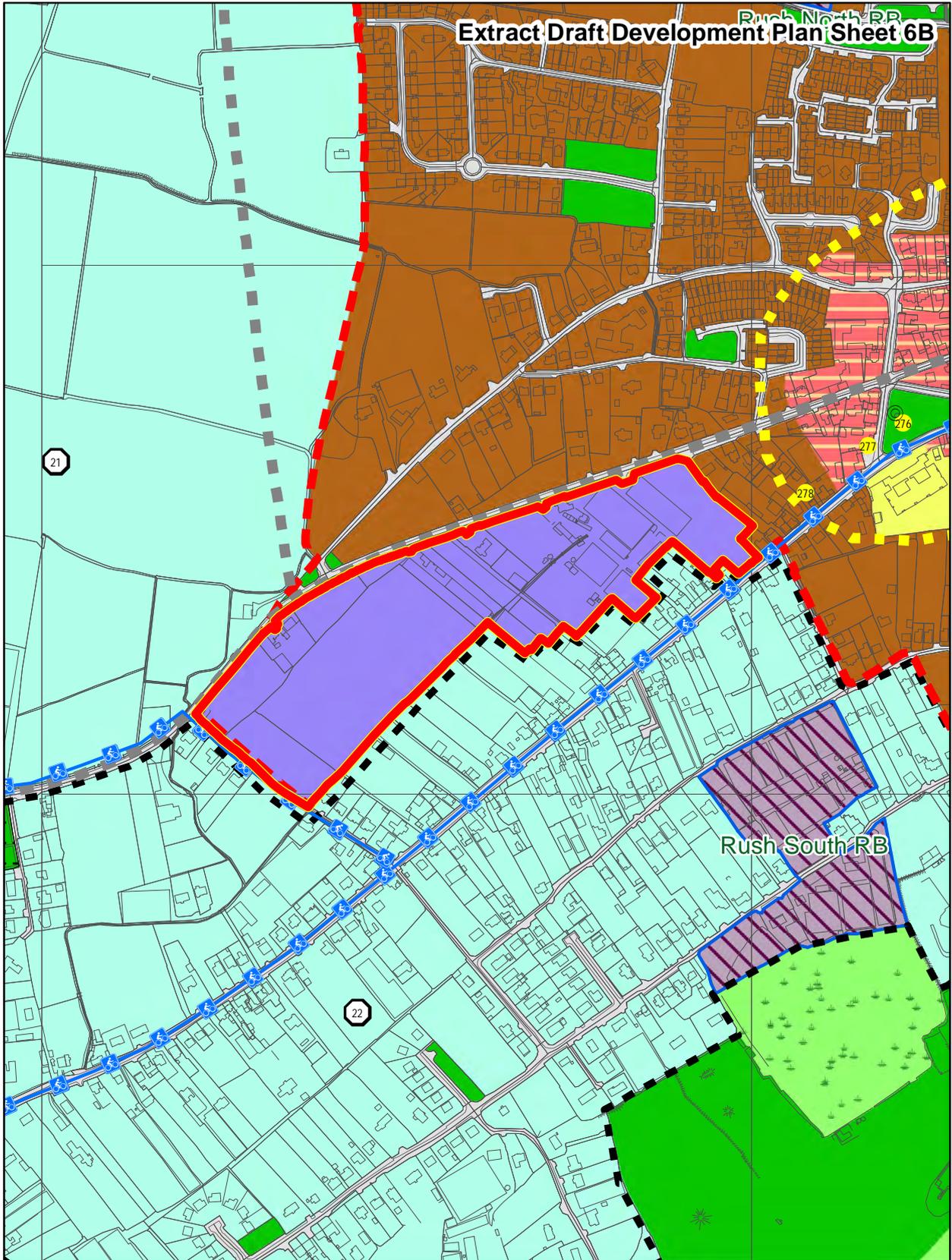
0 40 80 160 240 320 400 480 560 640 Meters

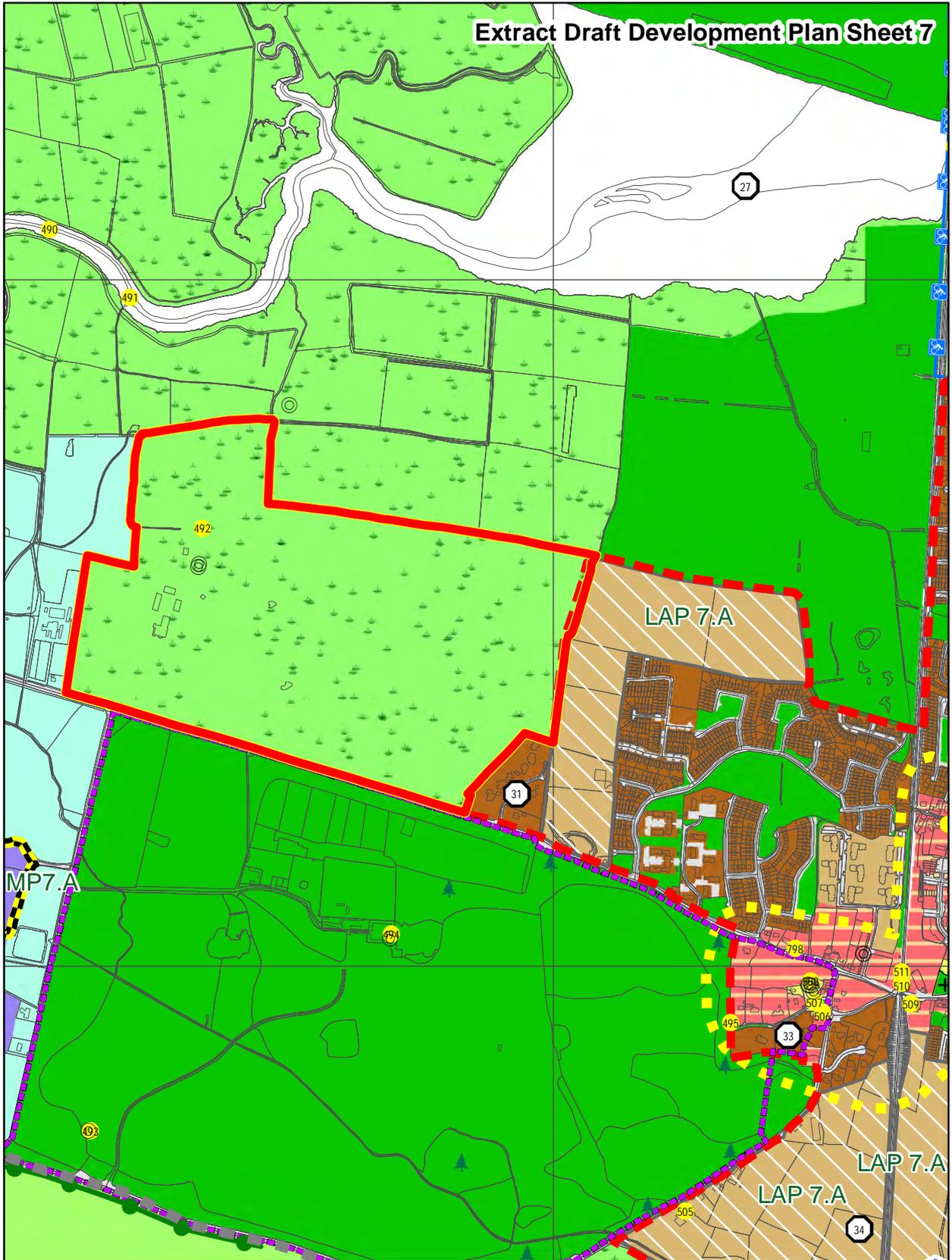


CE SH 6a.1



# APPENDIX A



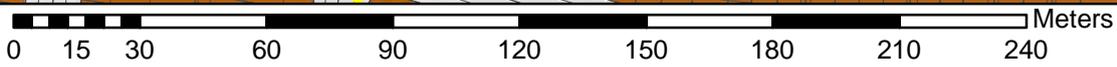
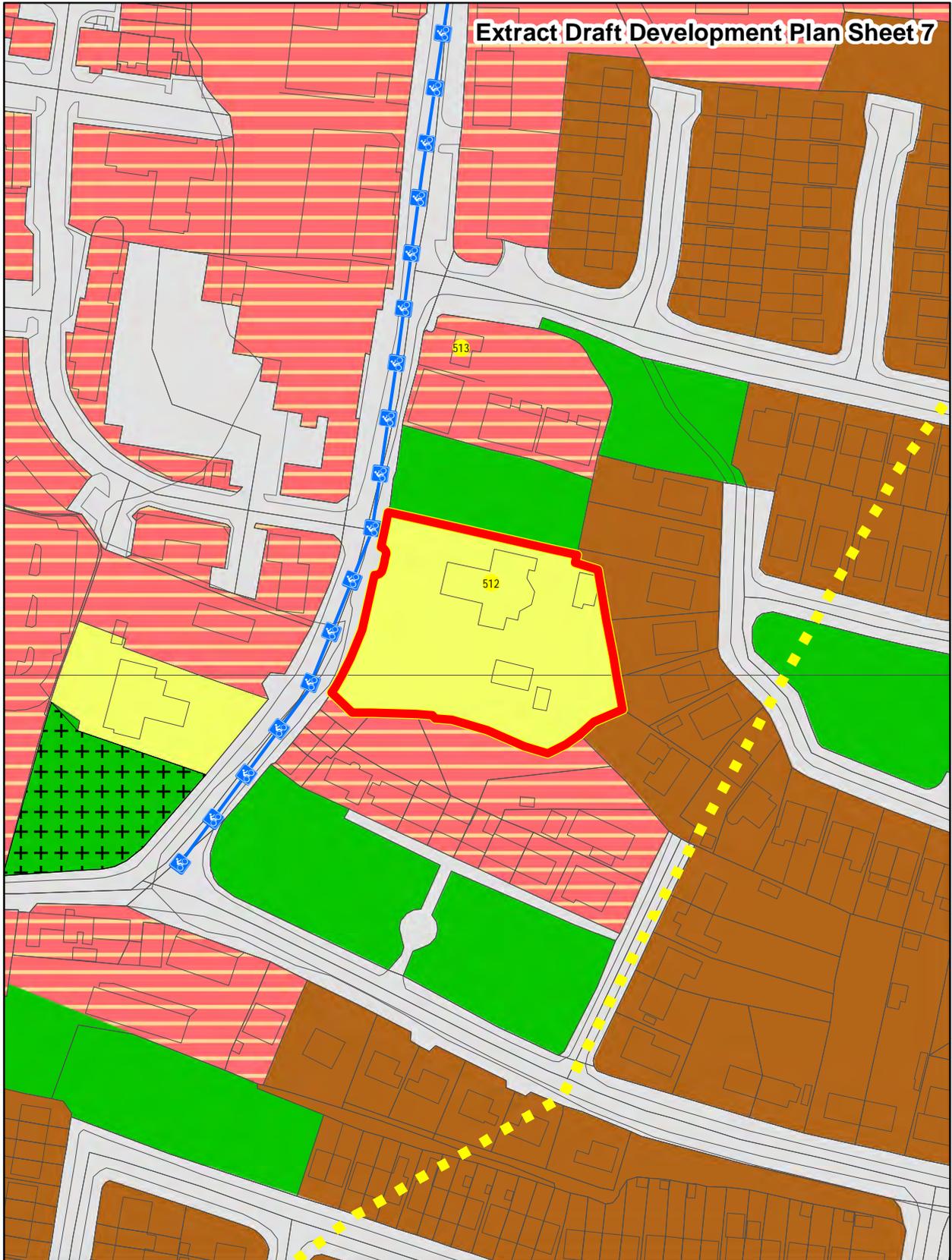


0 110 220 440 660 880 1,100 1,320 1,540 1,760 Meters



CE SH 7.1

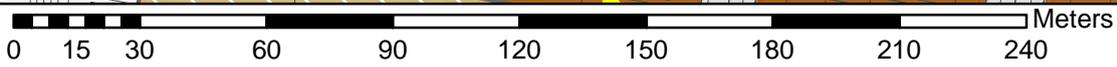
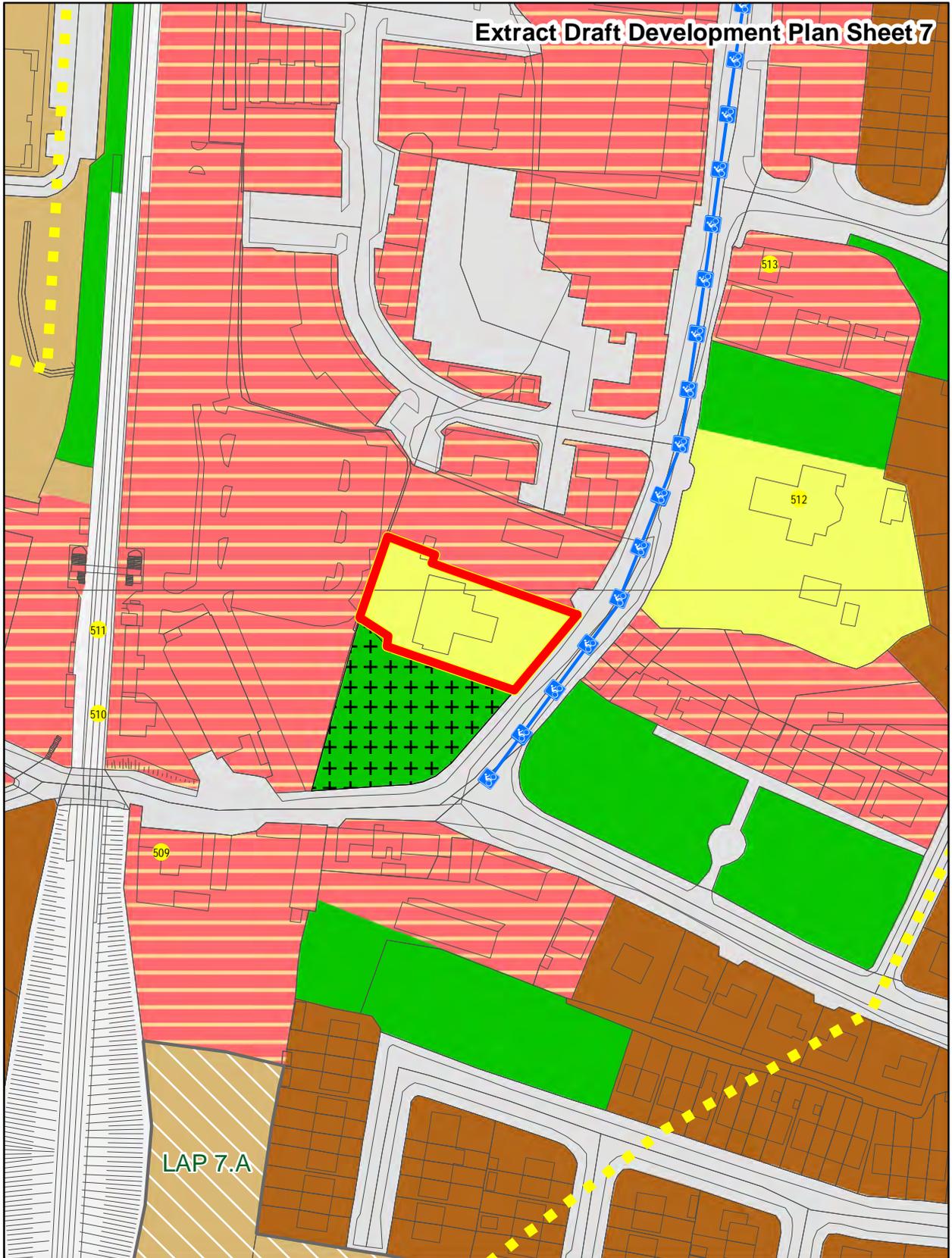




**CE SH 7.2**

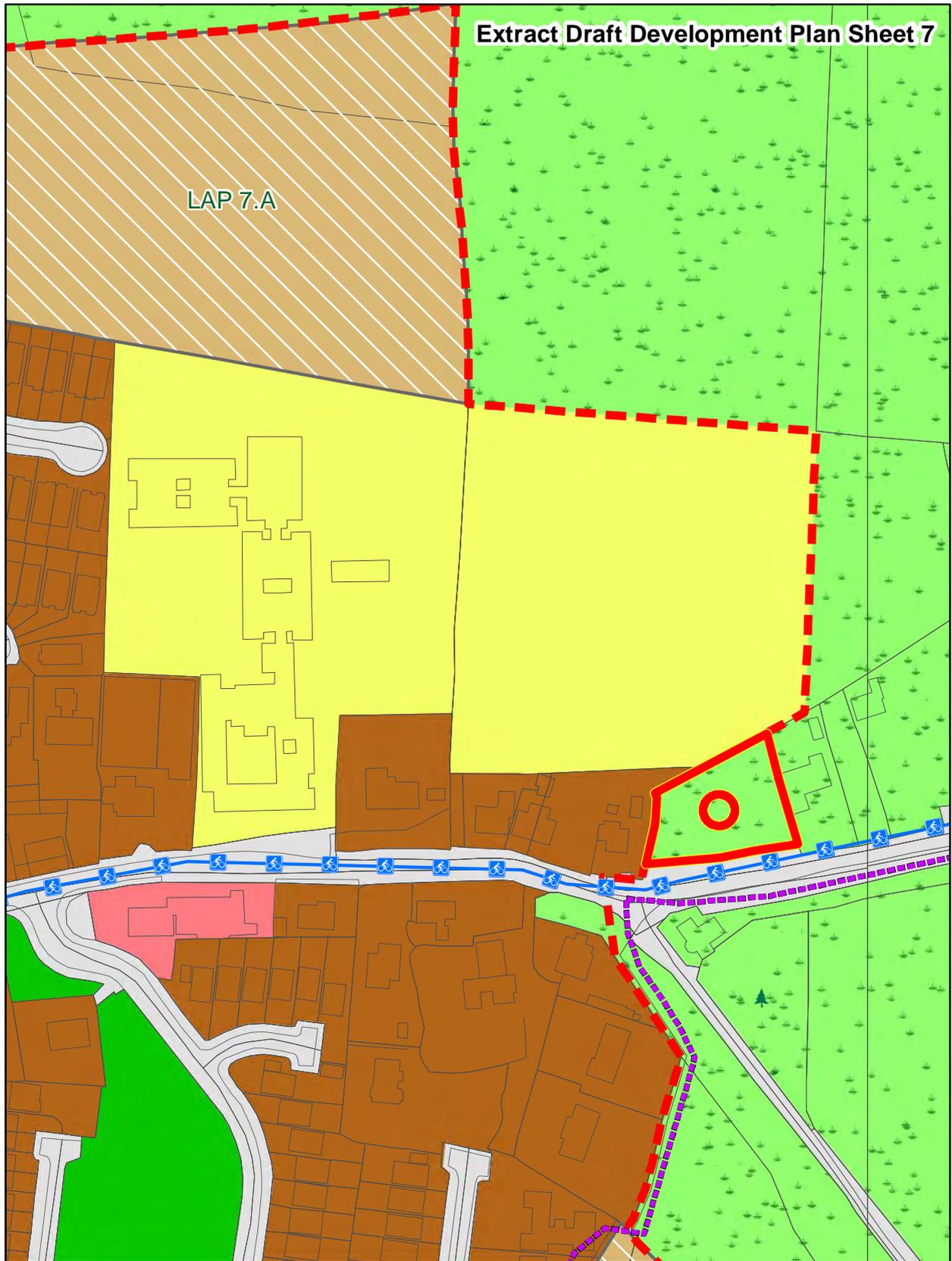


# APPENDIX A



CE SH 7.3





Extract Draft Development Plan Sheet 7

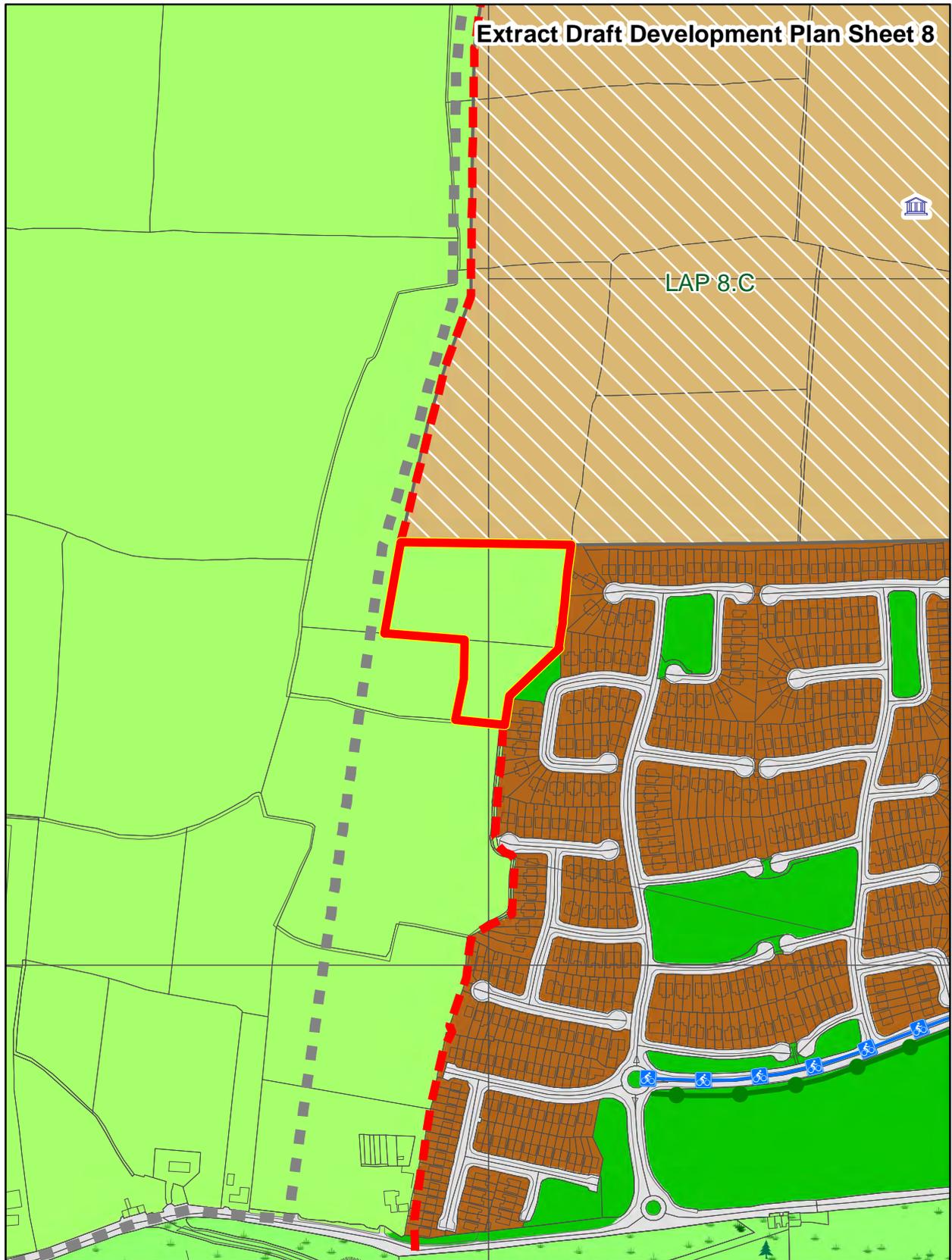
LAP 7.A

0 15 30 60 90 120 150 180 210 240 Meters



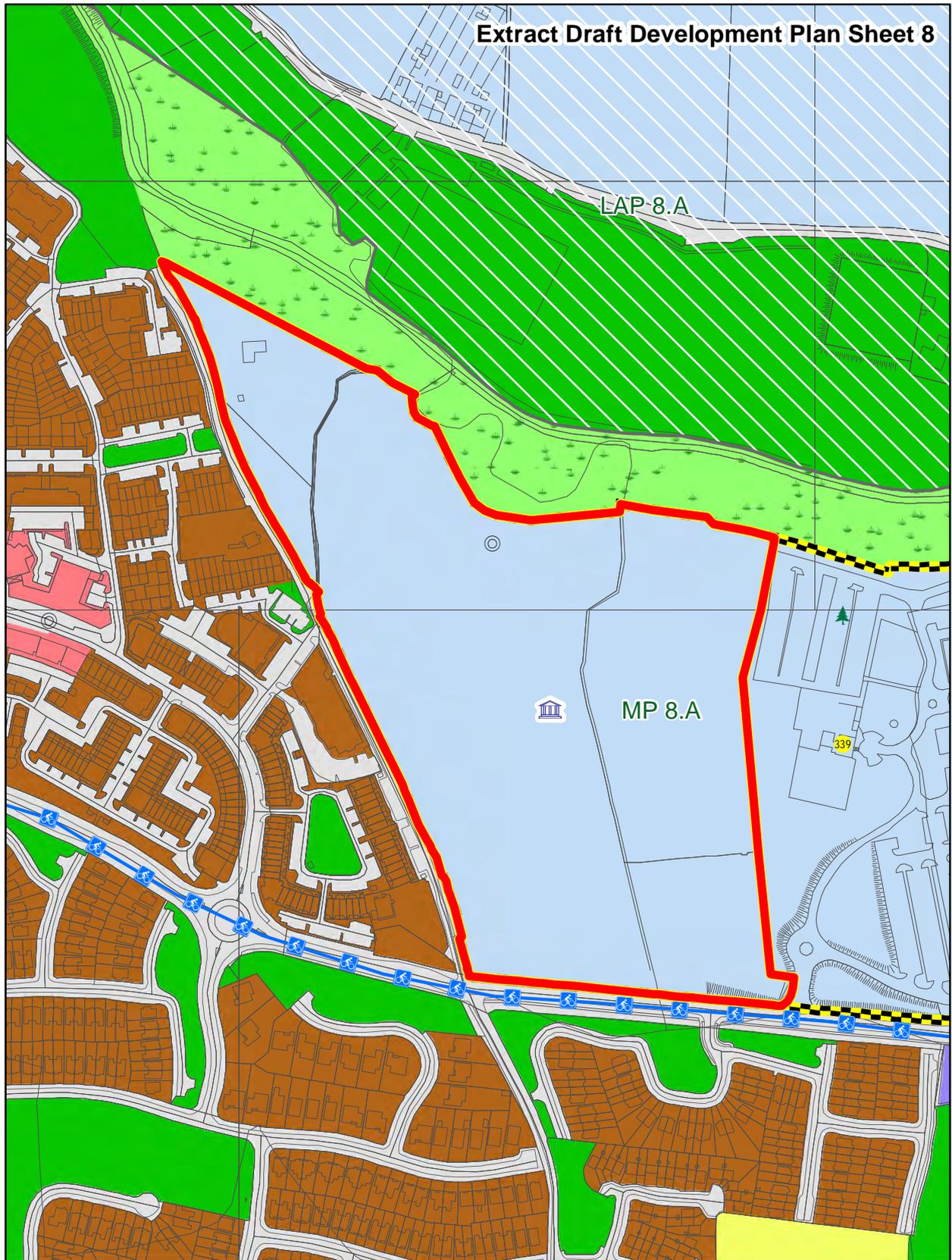
CE SH 7.4





 **CE SH 8.1**



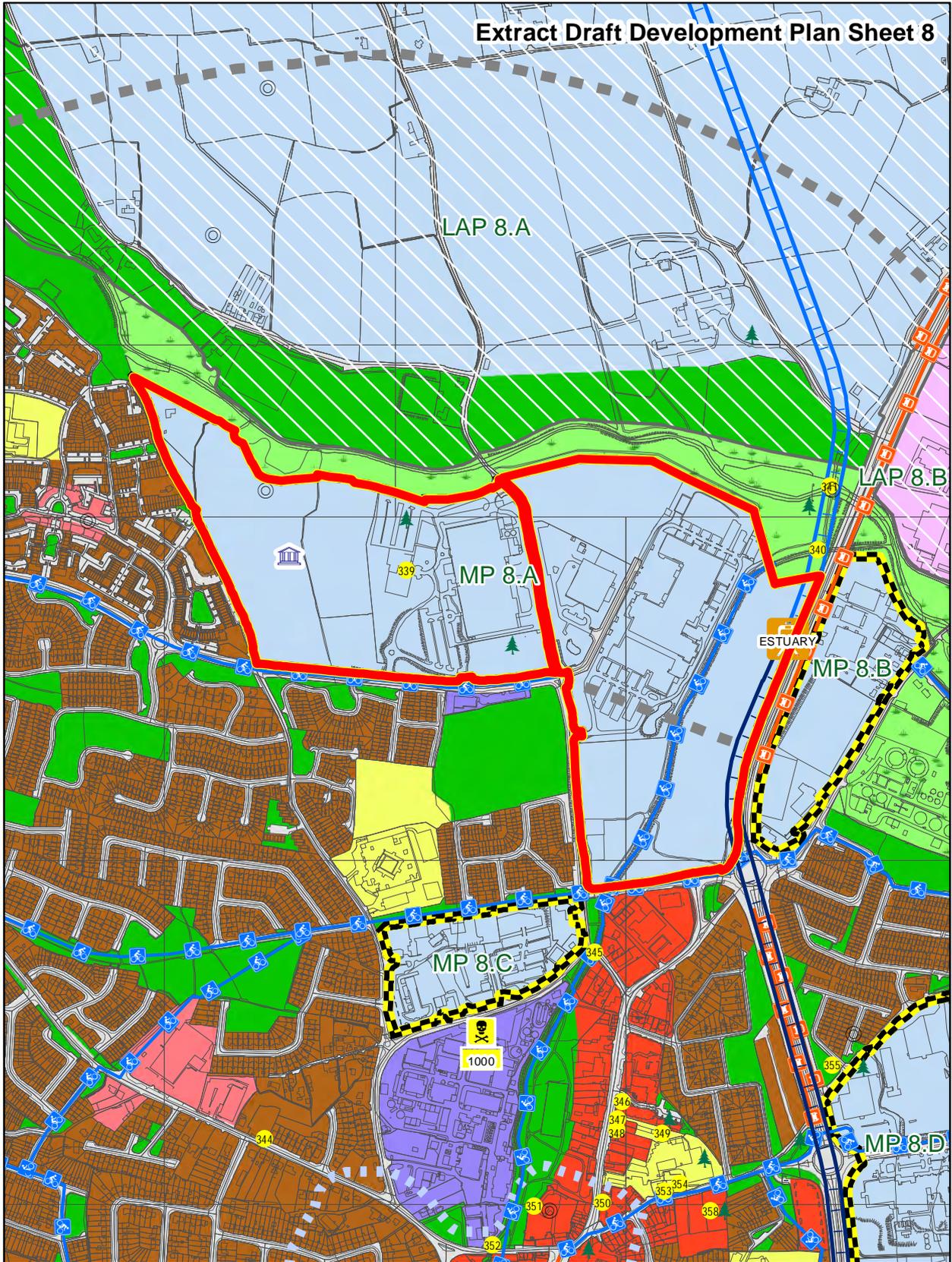


0 35 70 140 210 280 350 420 490 560 Meters



**CE SH 8.2**





CE SH 8.3



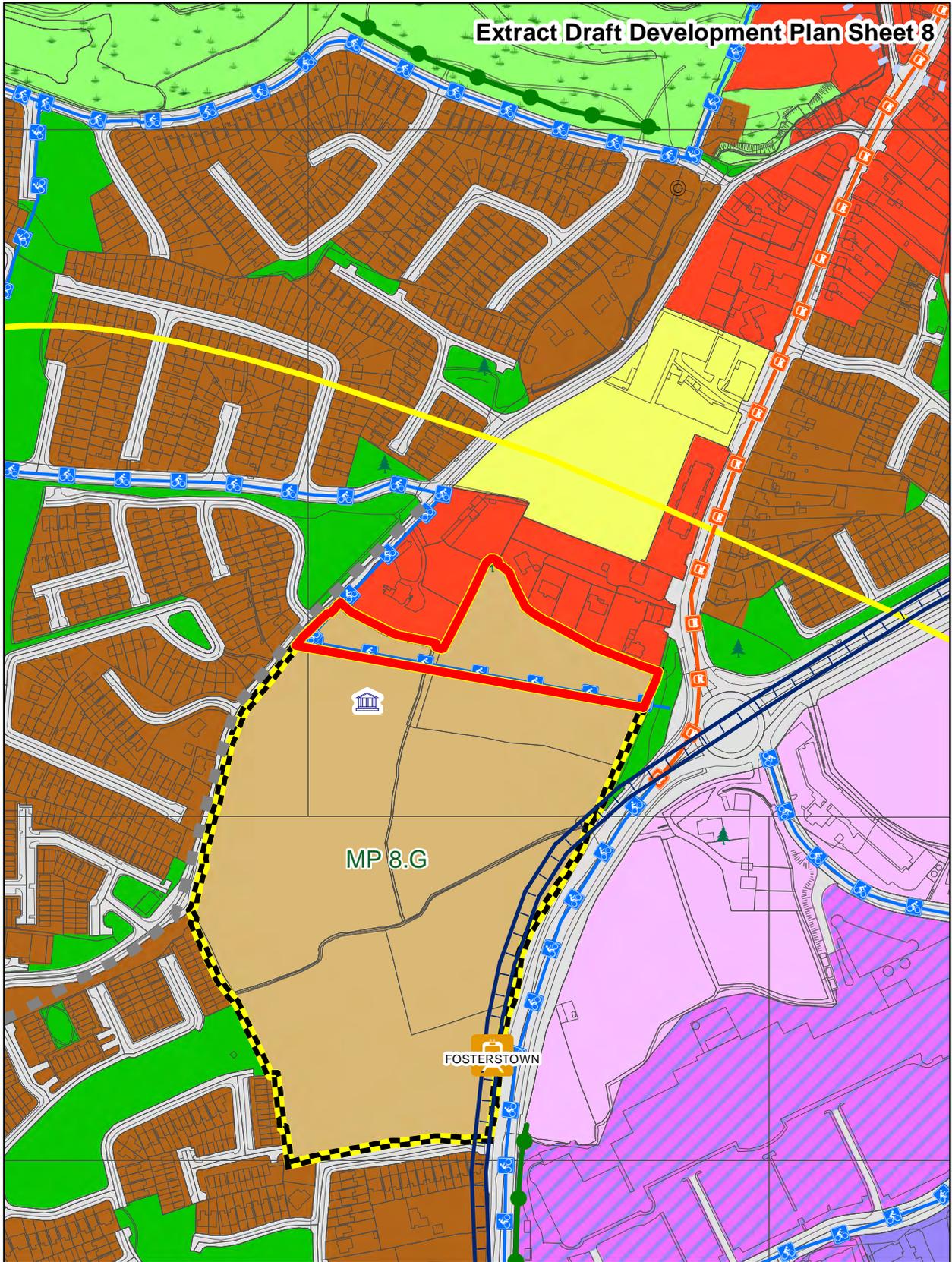


0 35 70 140 210 280 350 420 490 560 Meters



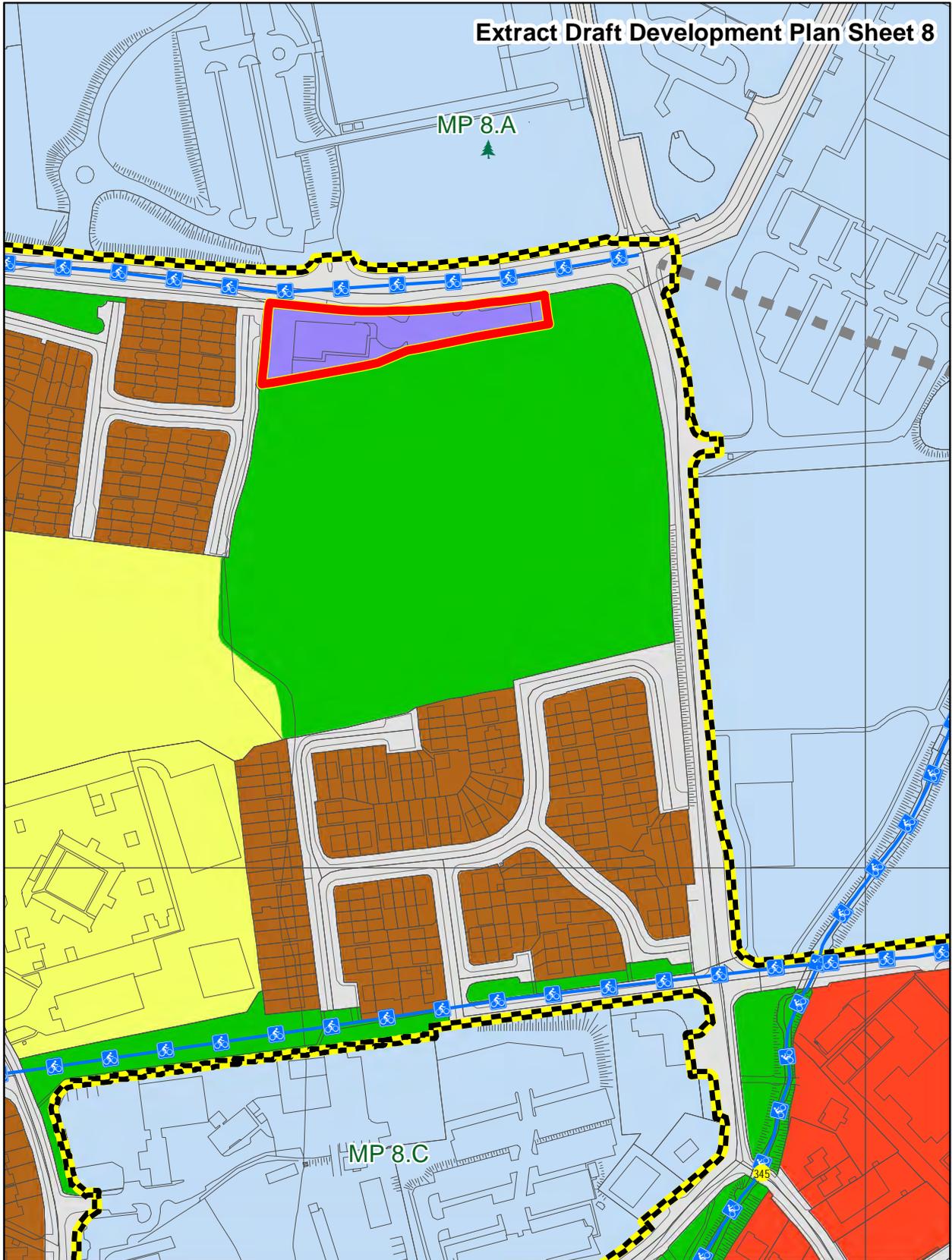
**CE SH 8.6**





CE SH 8.7

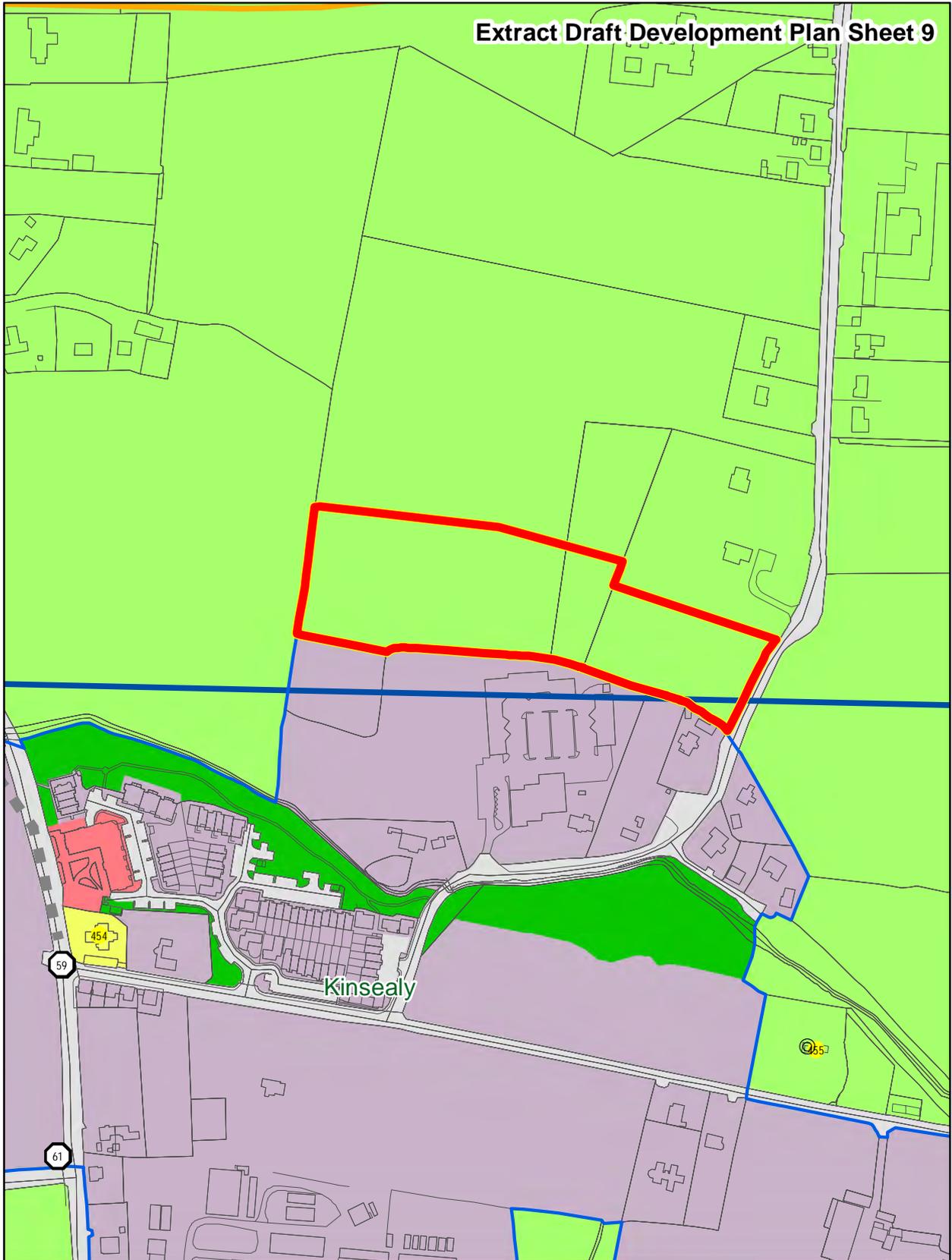




**CE SH 8.8**





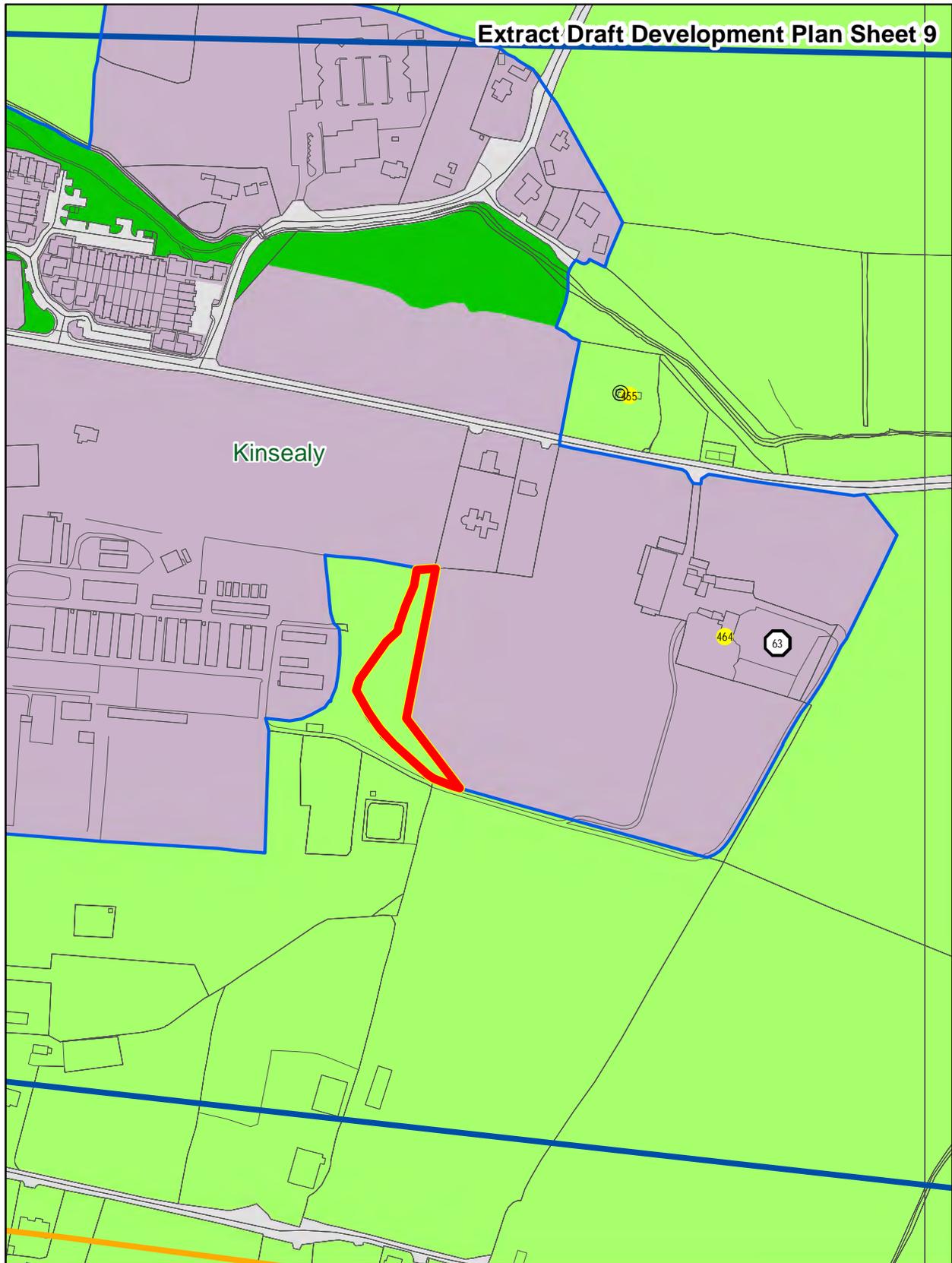


Extract Draft Development Plan Sheet 9



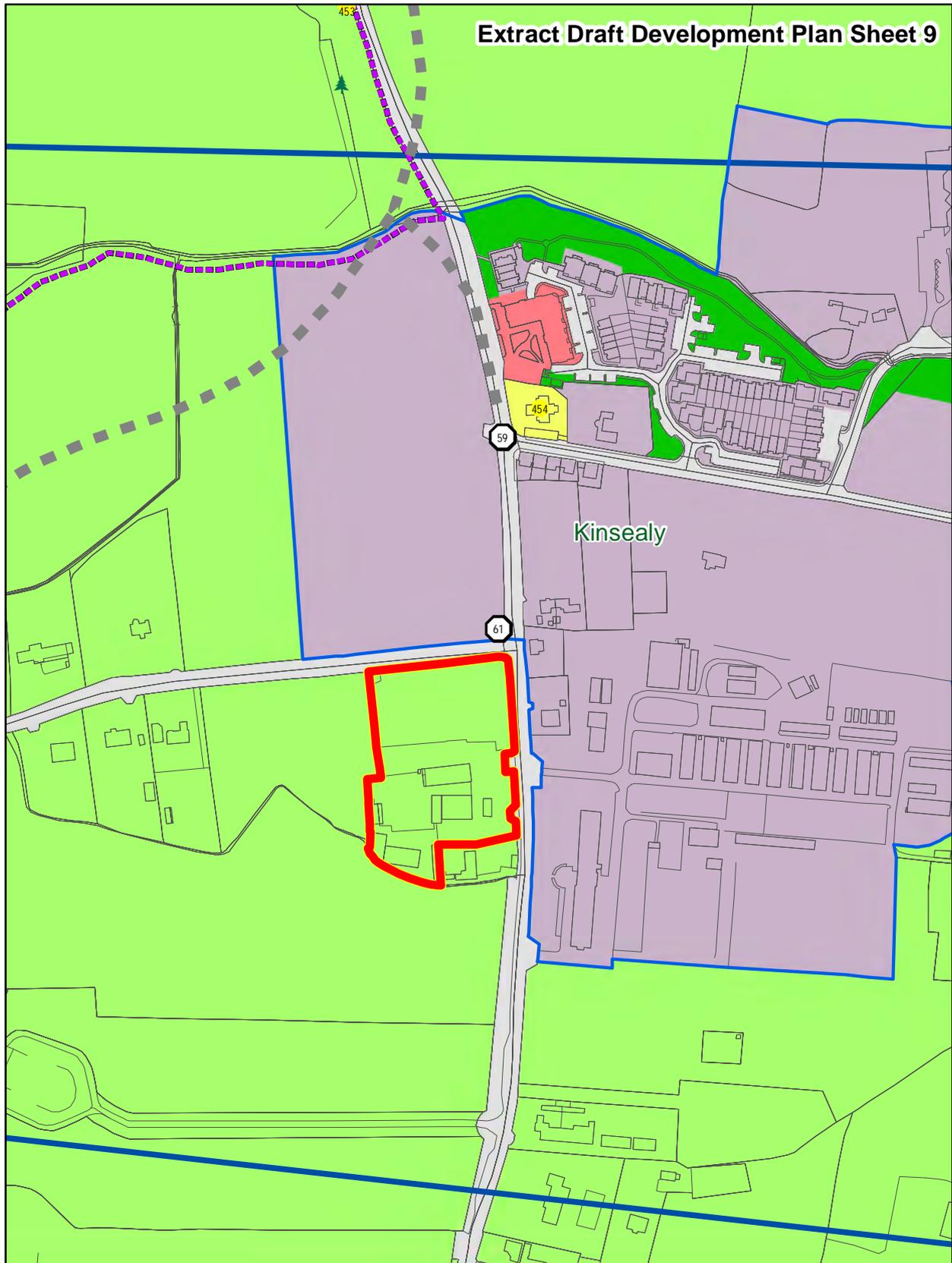
**CE SH 9.3**





**CE SH 9.4**





Extract Draft Development Plan Sheet 9

0 35 70 140 210 280 350 420 490 560 Meters



**CE SH 9.6**



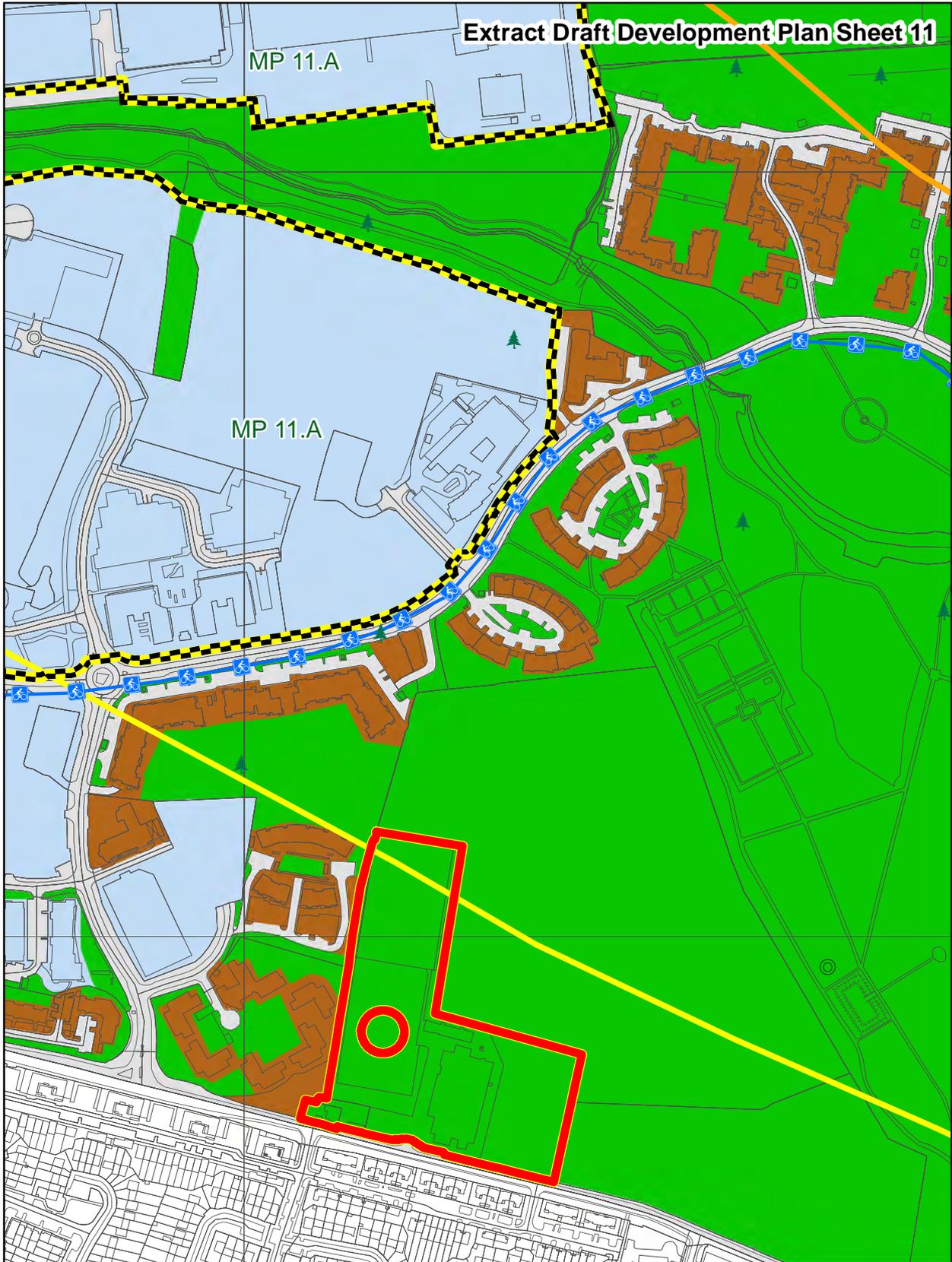


0 35 70 140 210 280 350 420 490 560 Meters



CE SH 10.1



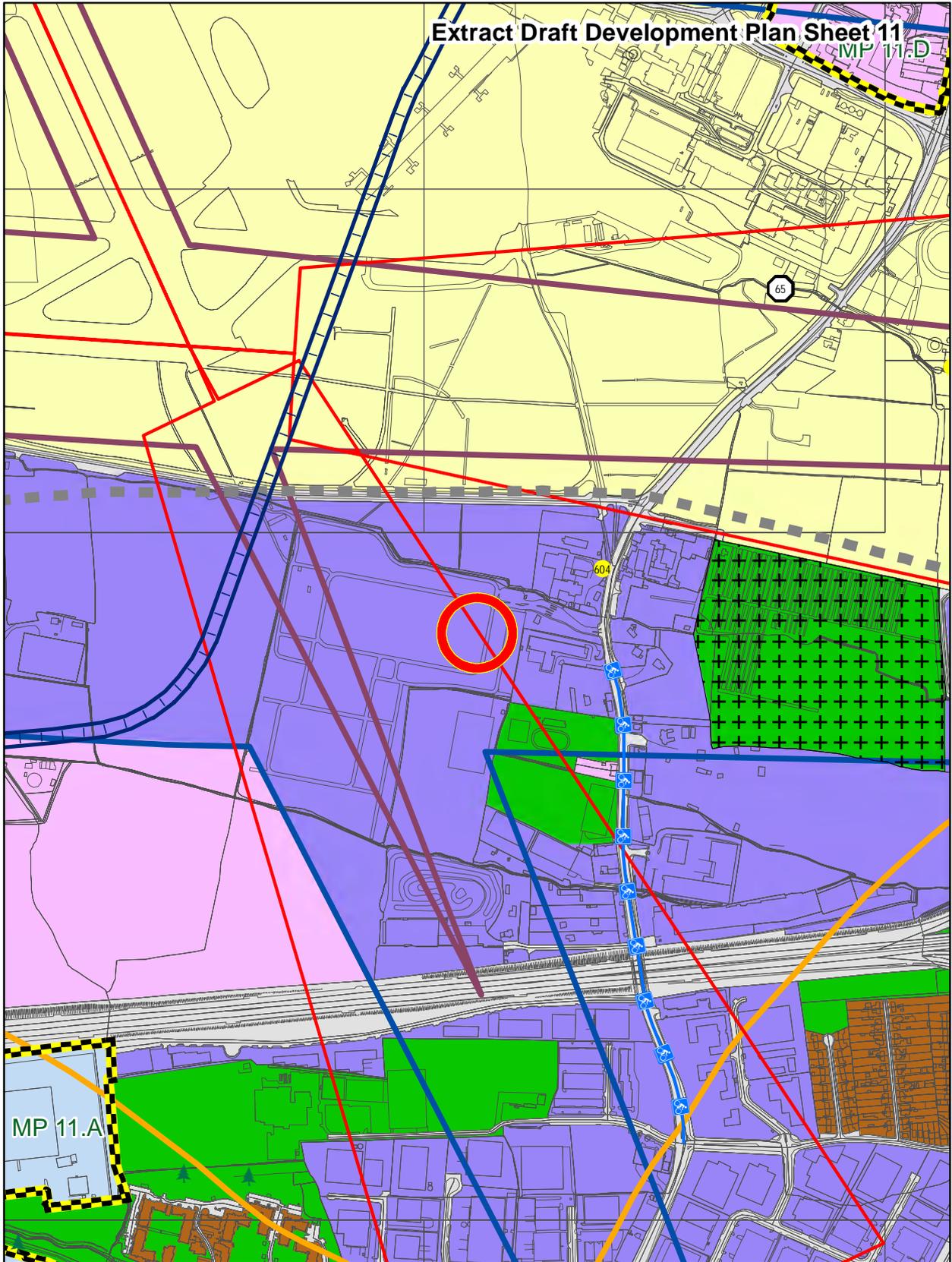


0 37.5 75 150 225 300 375 450 525 600 Meters



**CE SH 11.1**



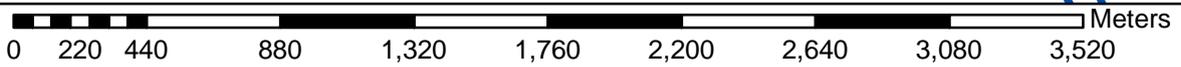
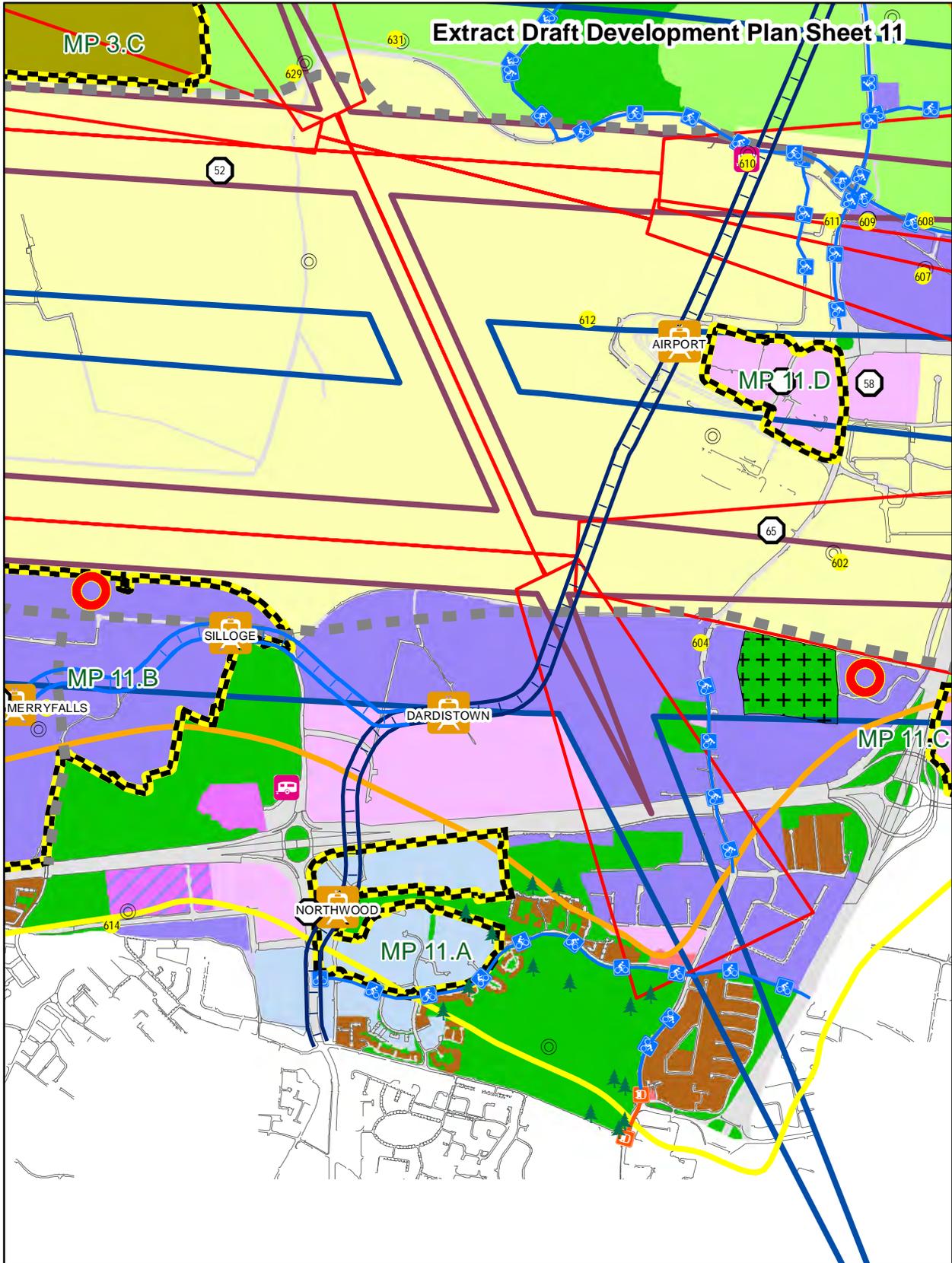


0 87.5 175 350 525 700 875 1,050 1,225 1,400 Meters



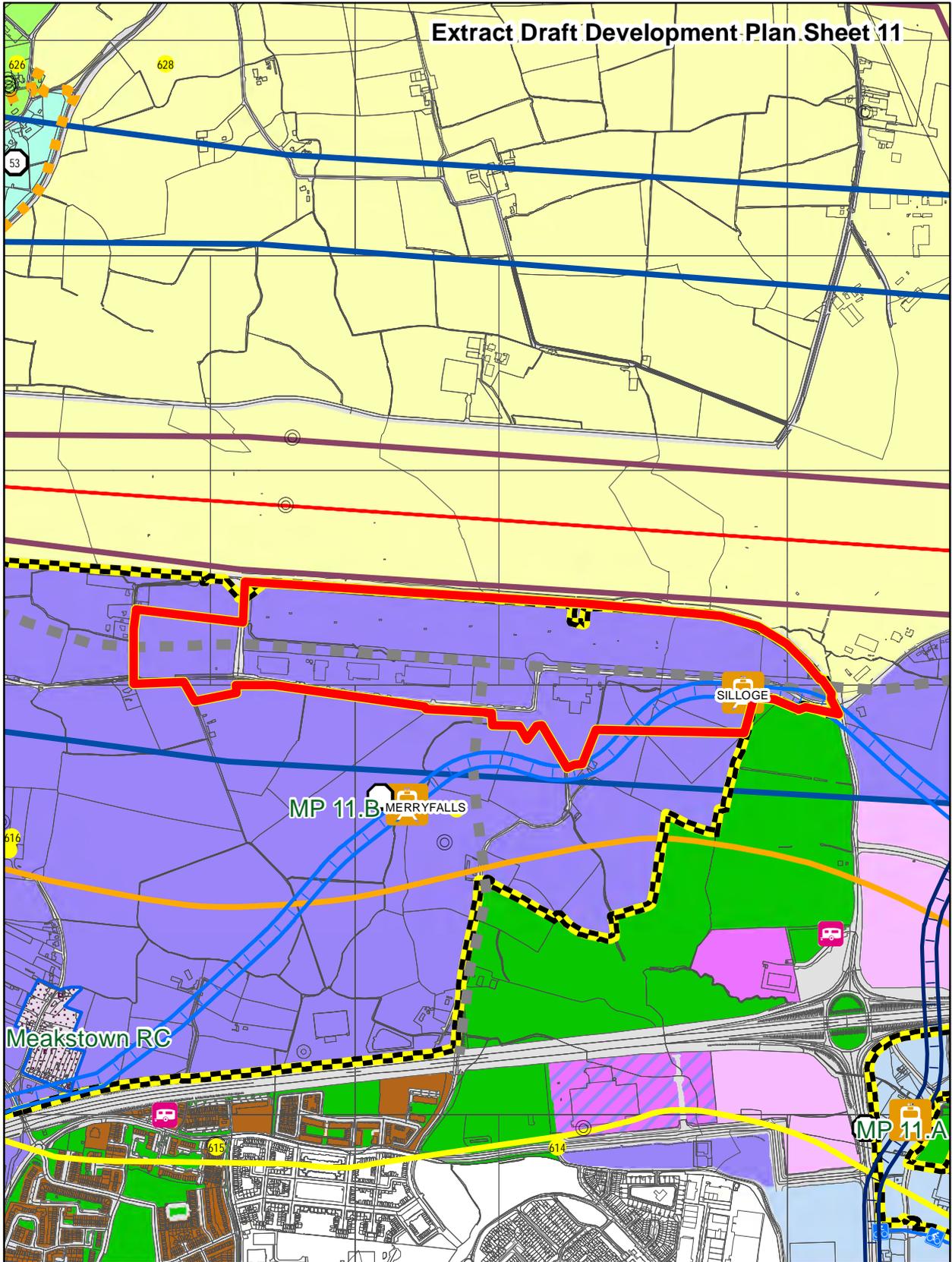
CE SH 11.2





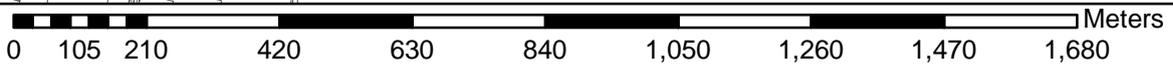
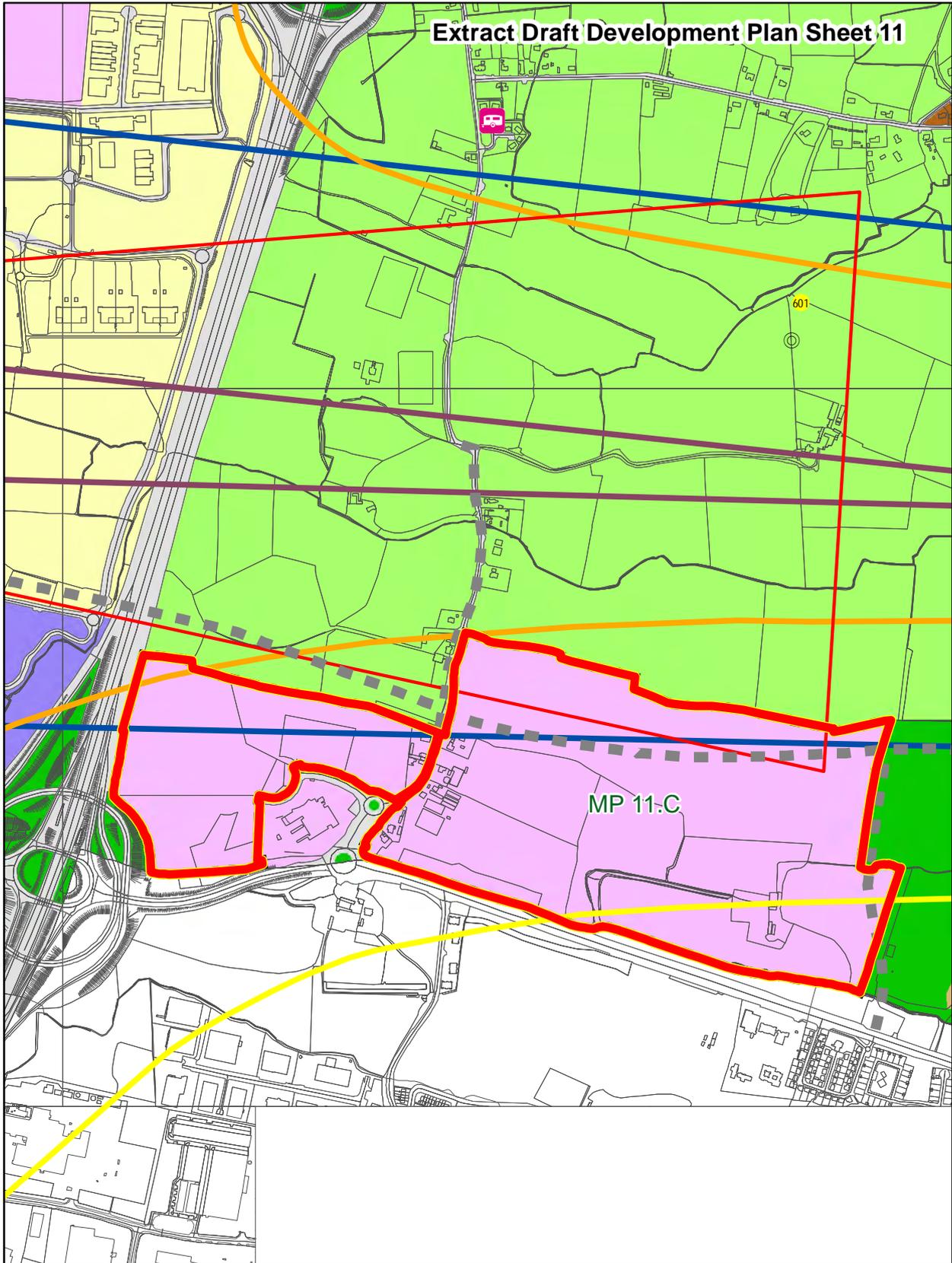
**CE SH 11.3**





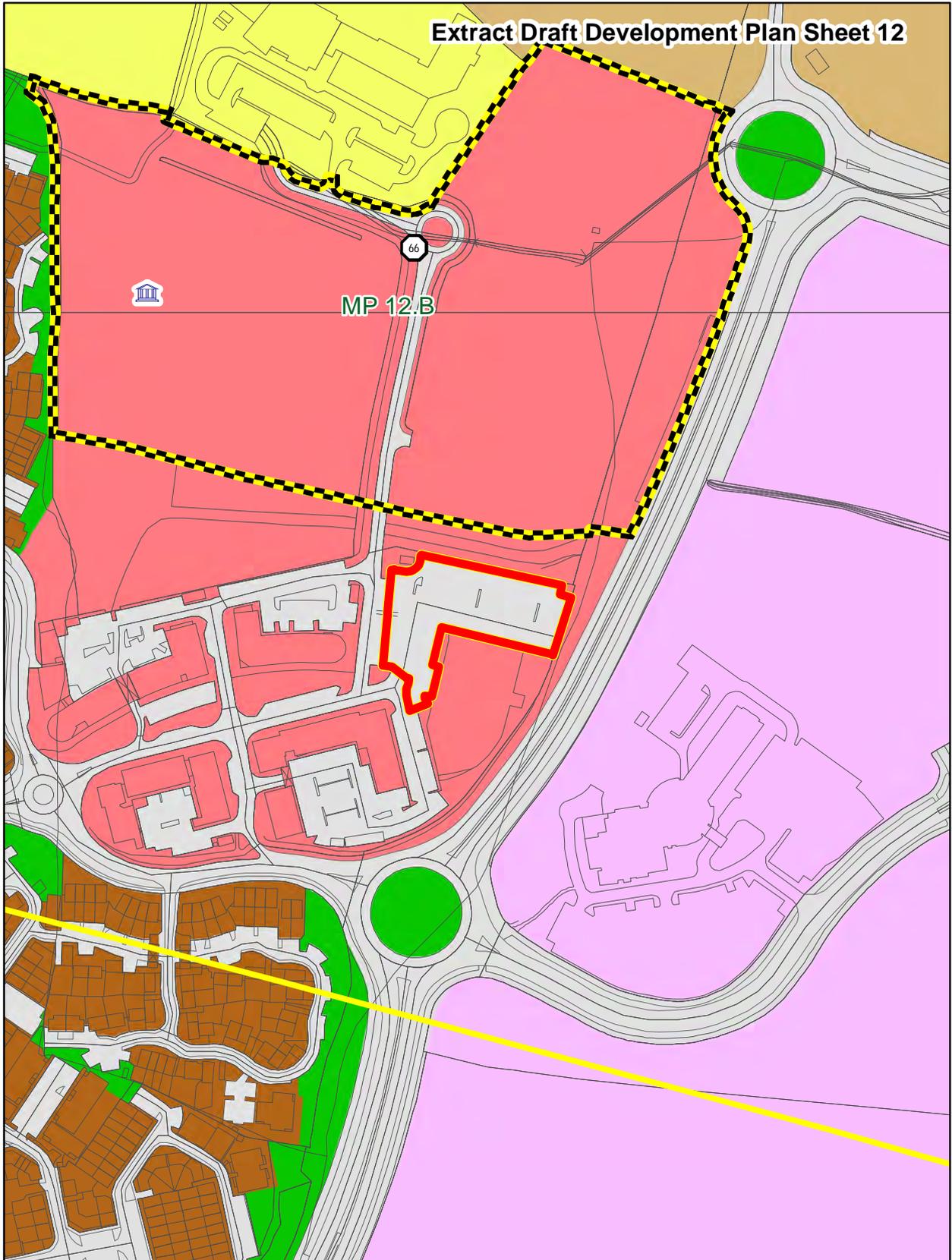
CE SH 11.5





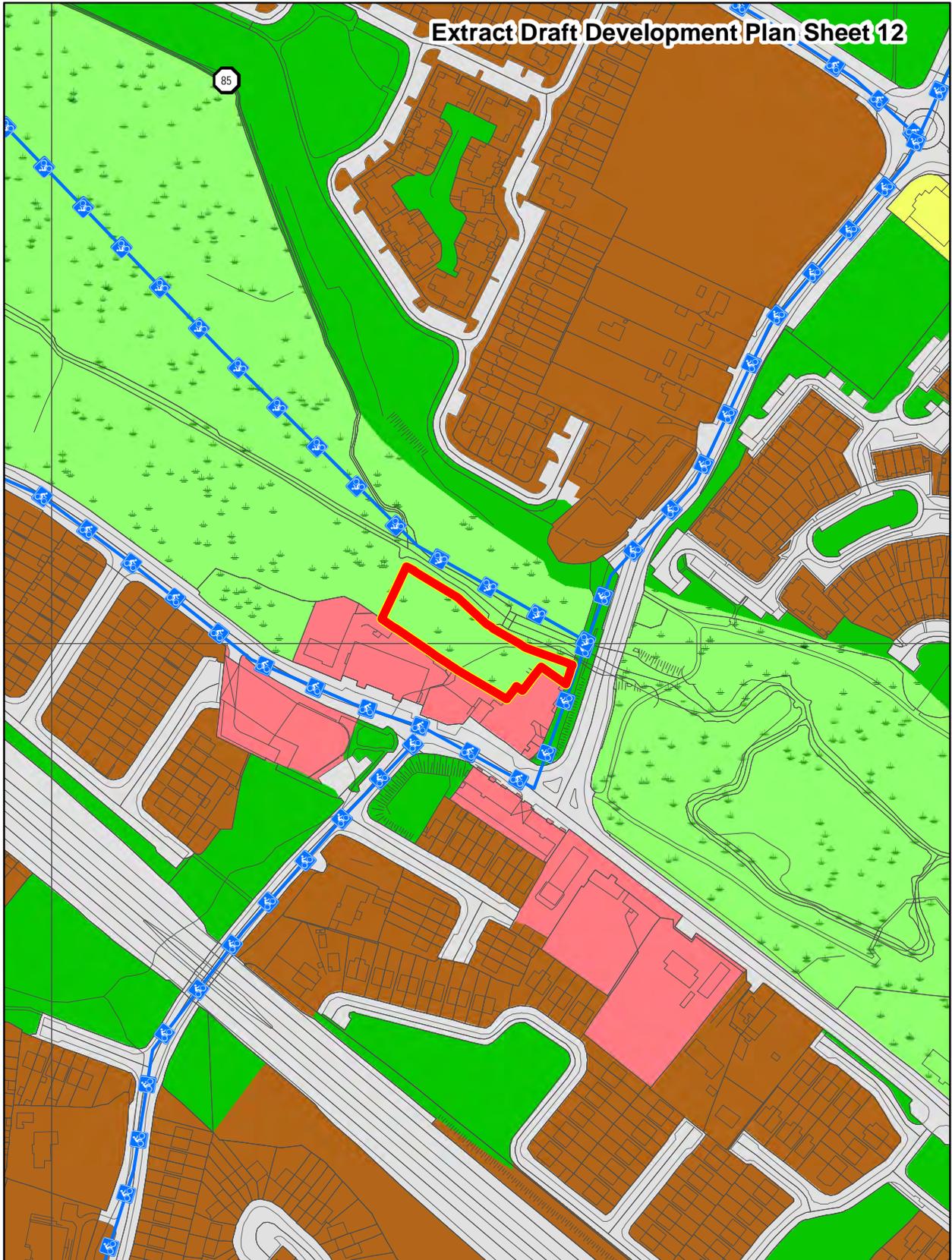
**CE SH 11.6**





CE SH 12.1





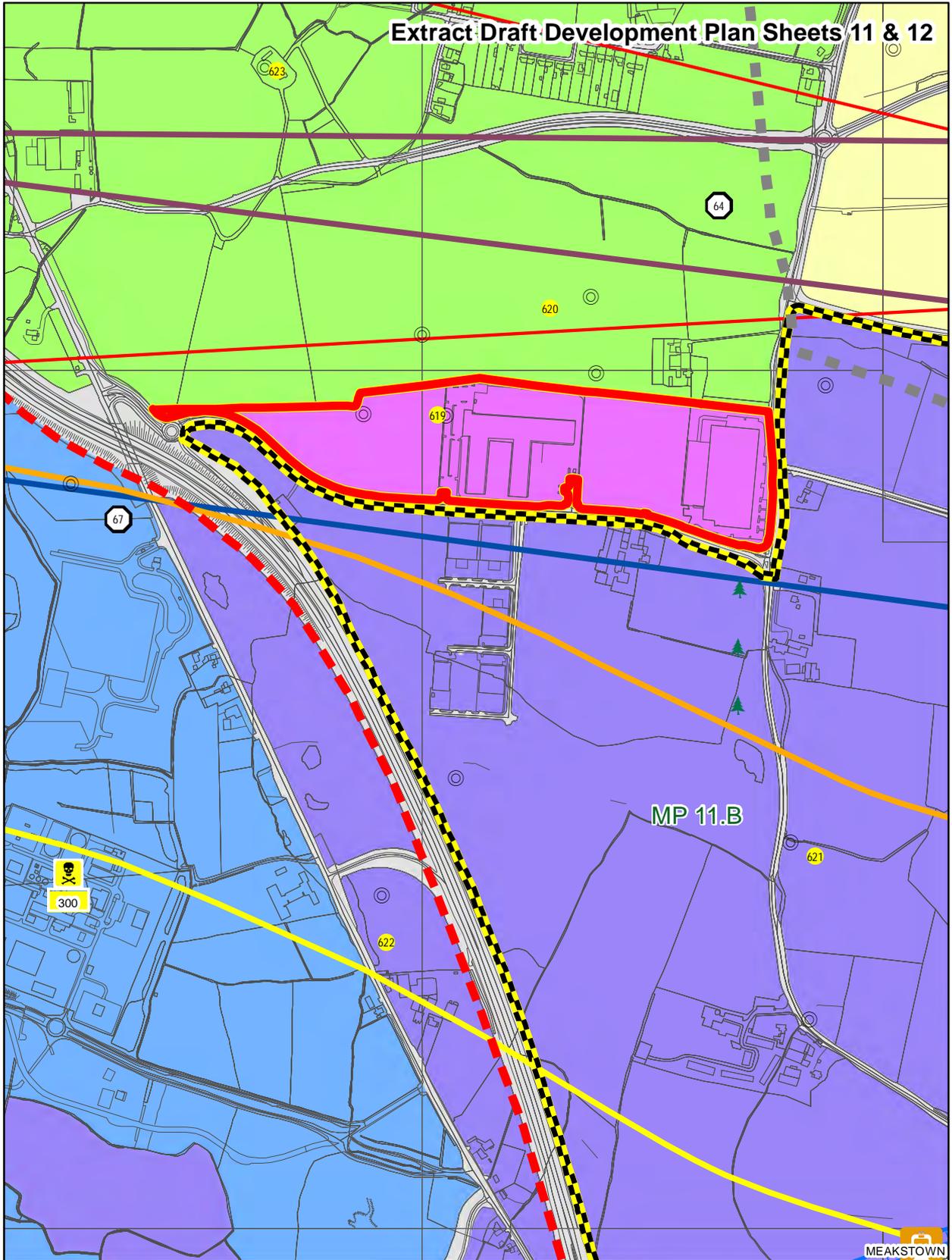
0 25 50 100 150 200 250 300 350 400 Meters



**CE SH 12.2**



# APPENDIX A



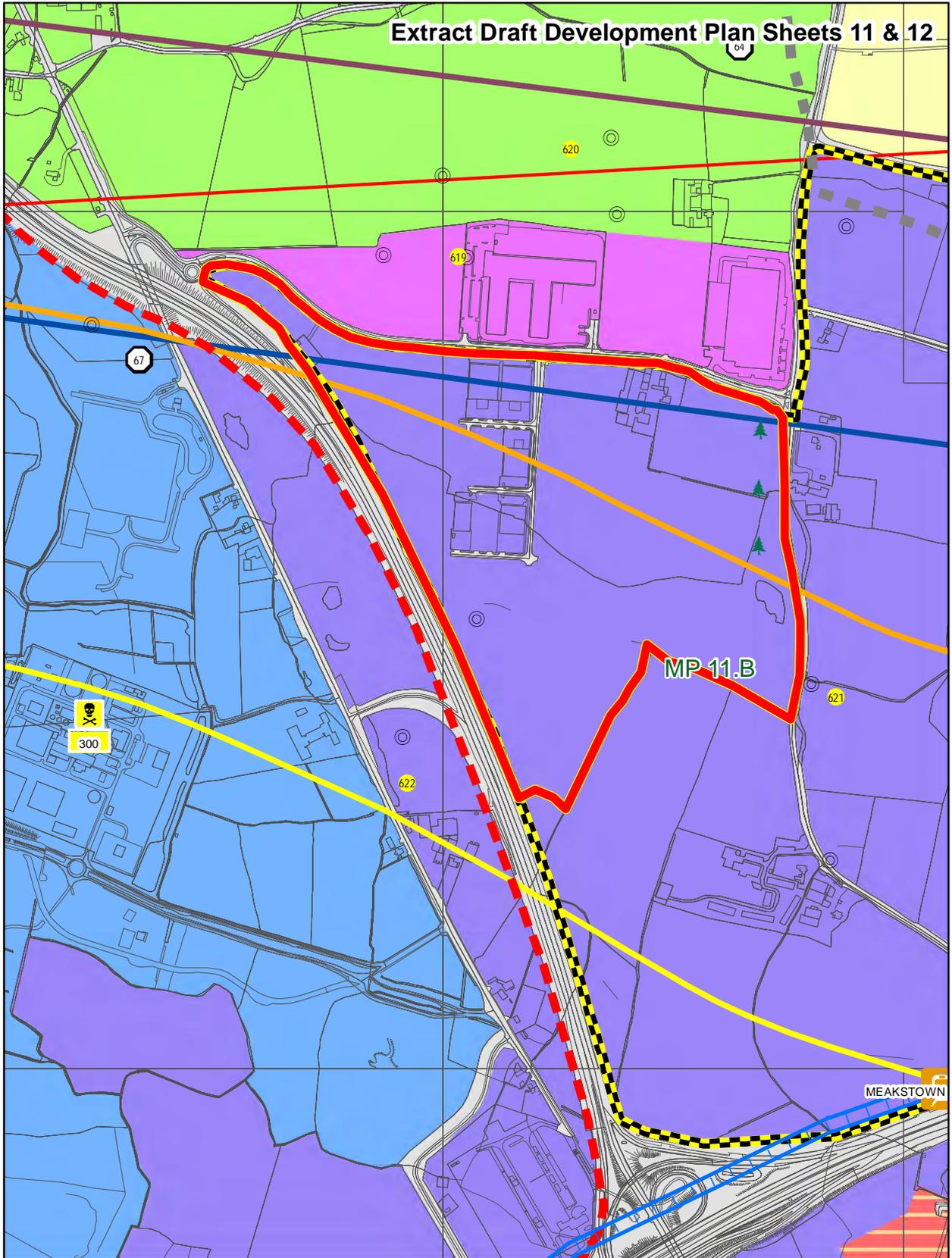
0 87.5 175 350 525 700 875 1,050 1,225 1,400 Meters



**CE SH 12.3**

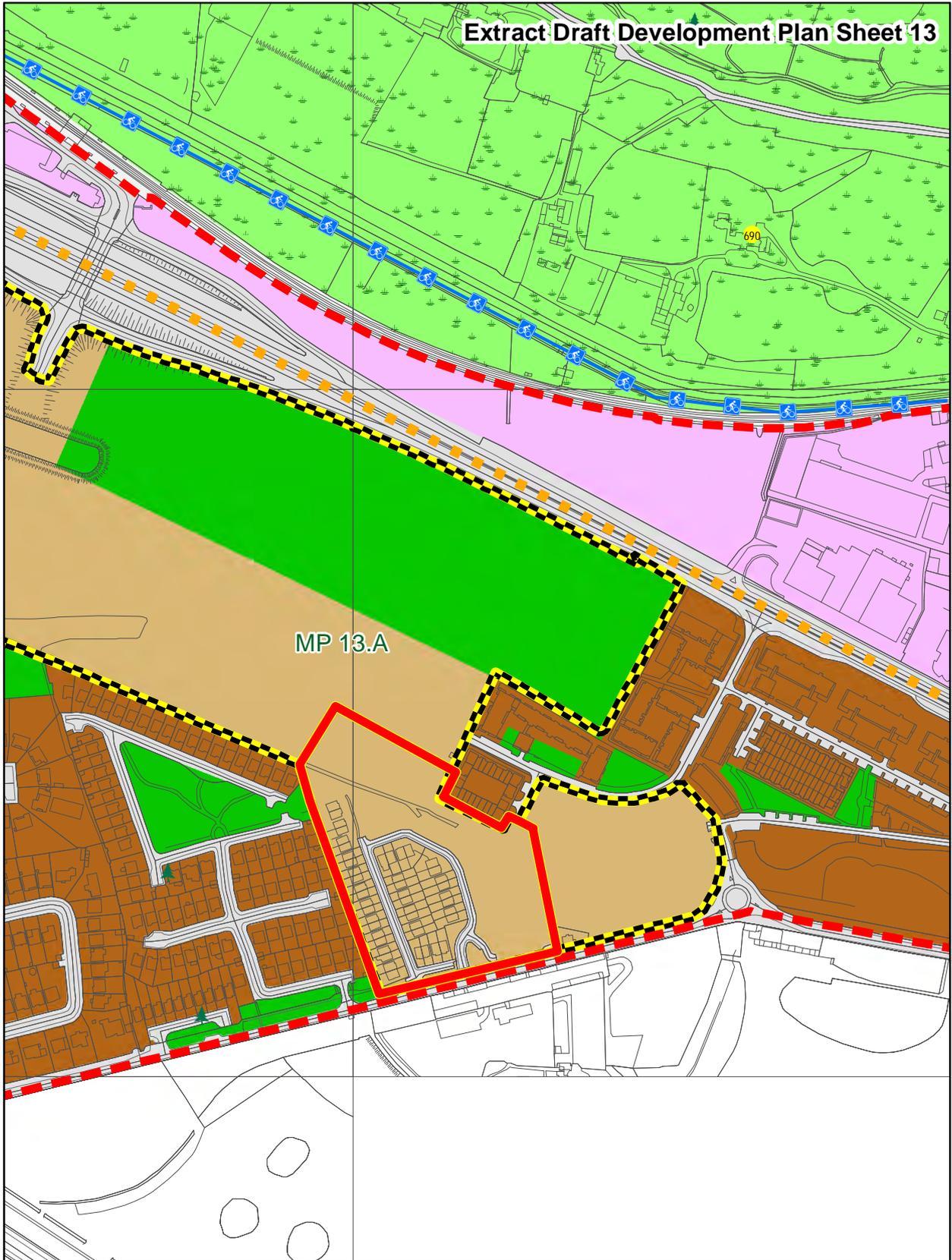


# APPENDIX A



CE SH 12.4



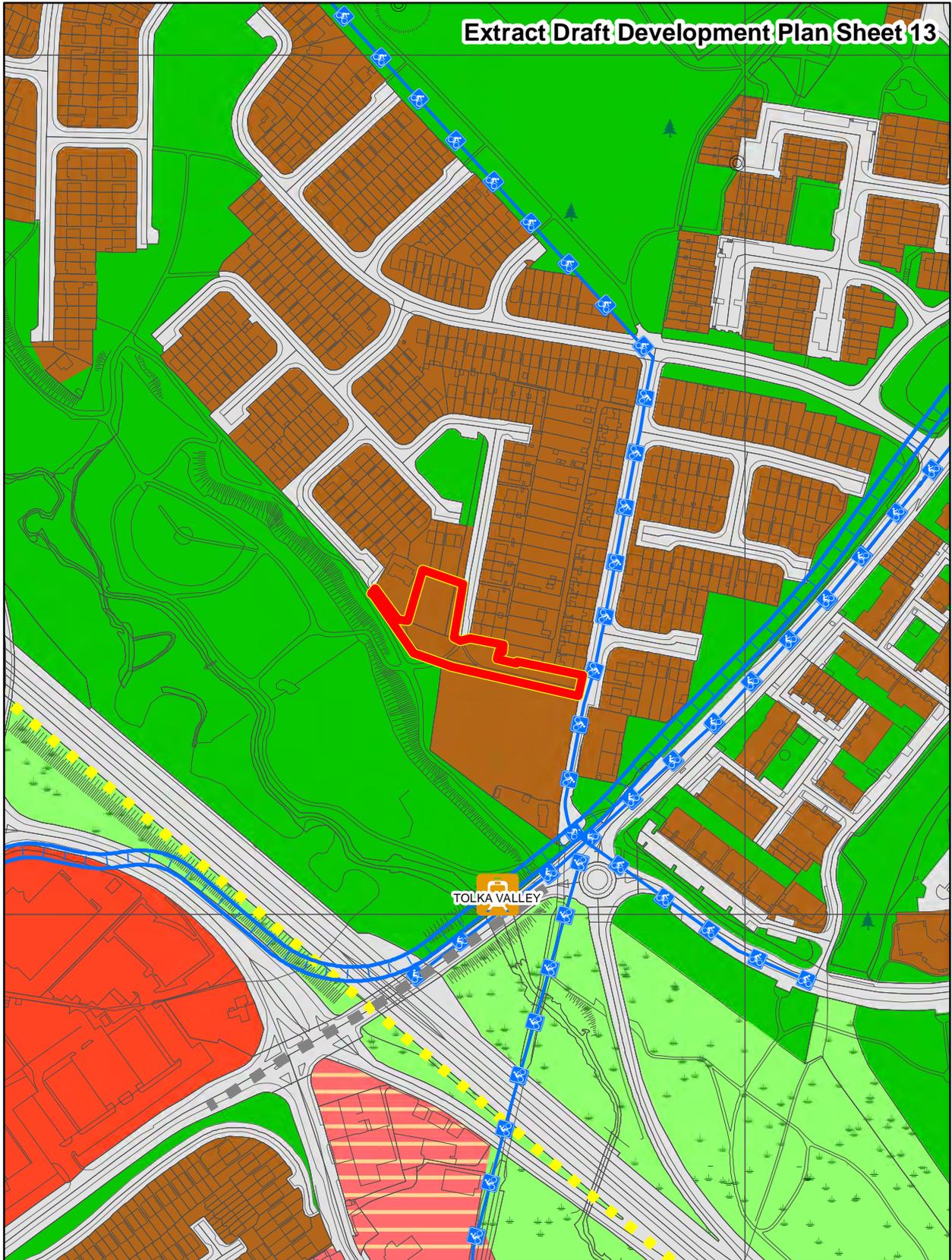


0 40 80 160 240 320 400 480 560 640 Meters



**CE SH 13.3**



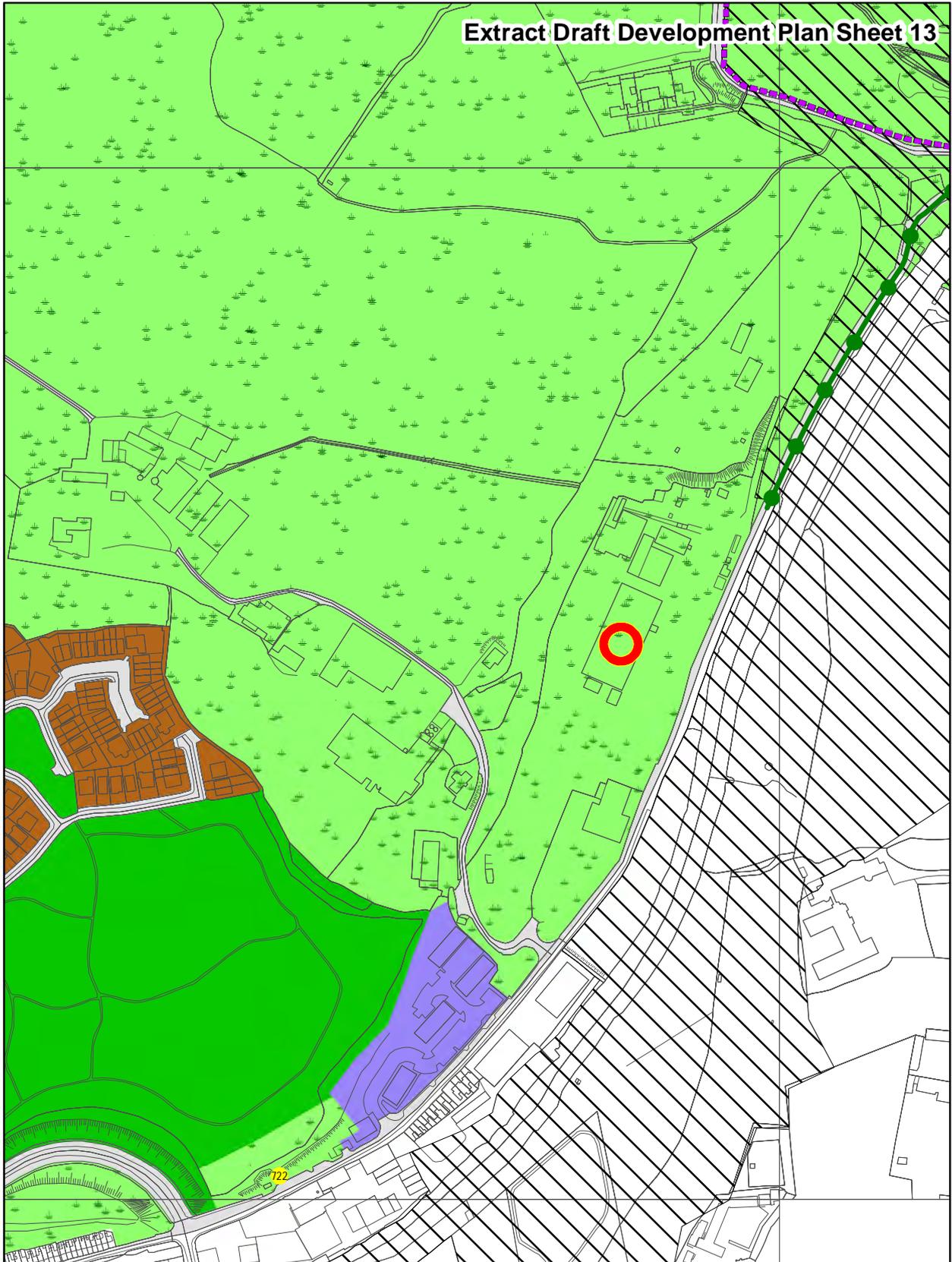


0 35 70 140 210 280 350 420 490 560 Meters



**CE SH 13.4**





**CE SH 13.6**



# APPENDIX A

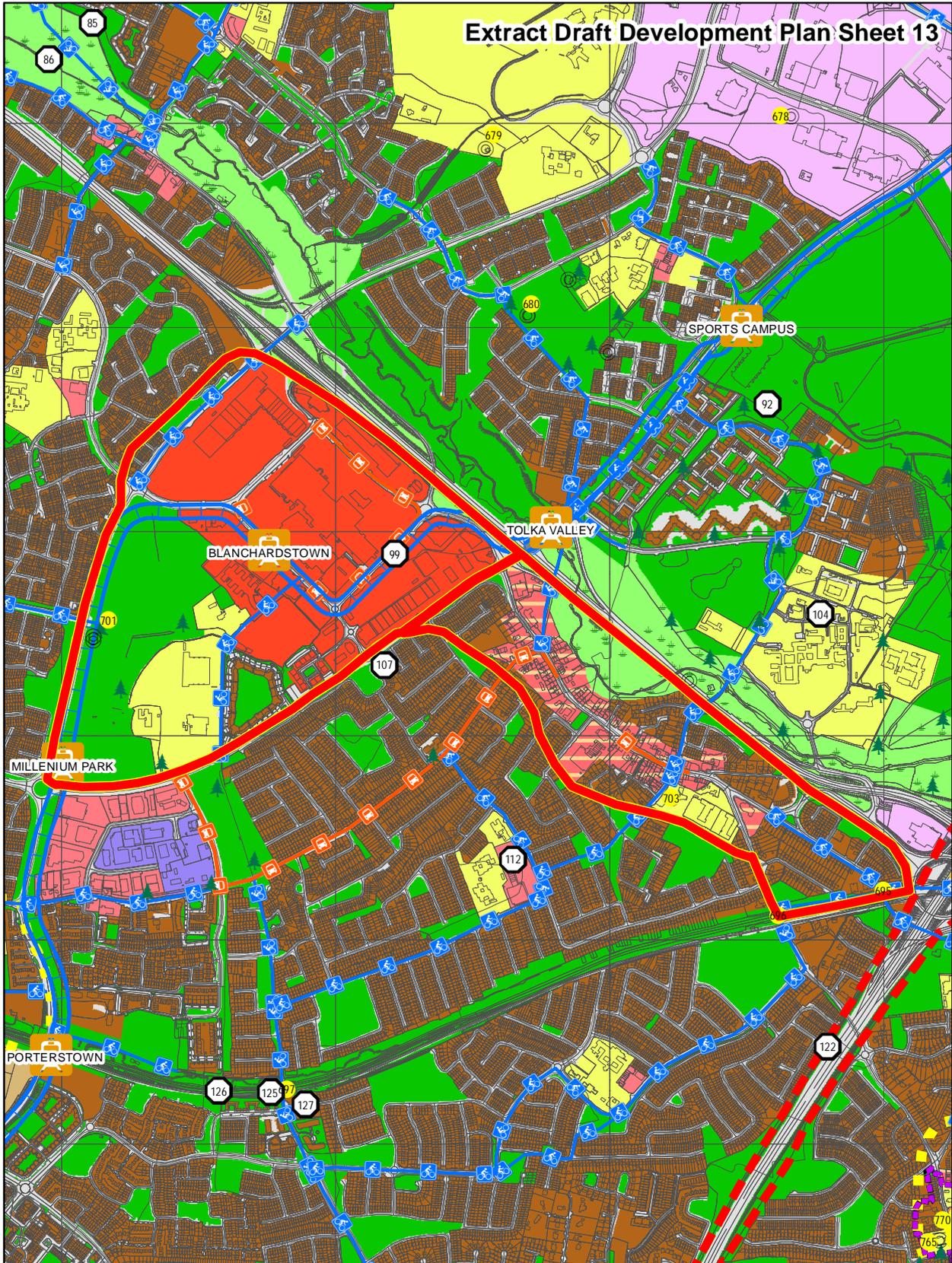


0 35 70 140 210 280 350 420 490 560 Meters



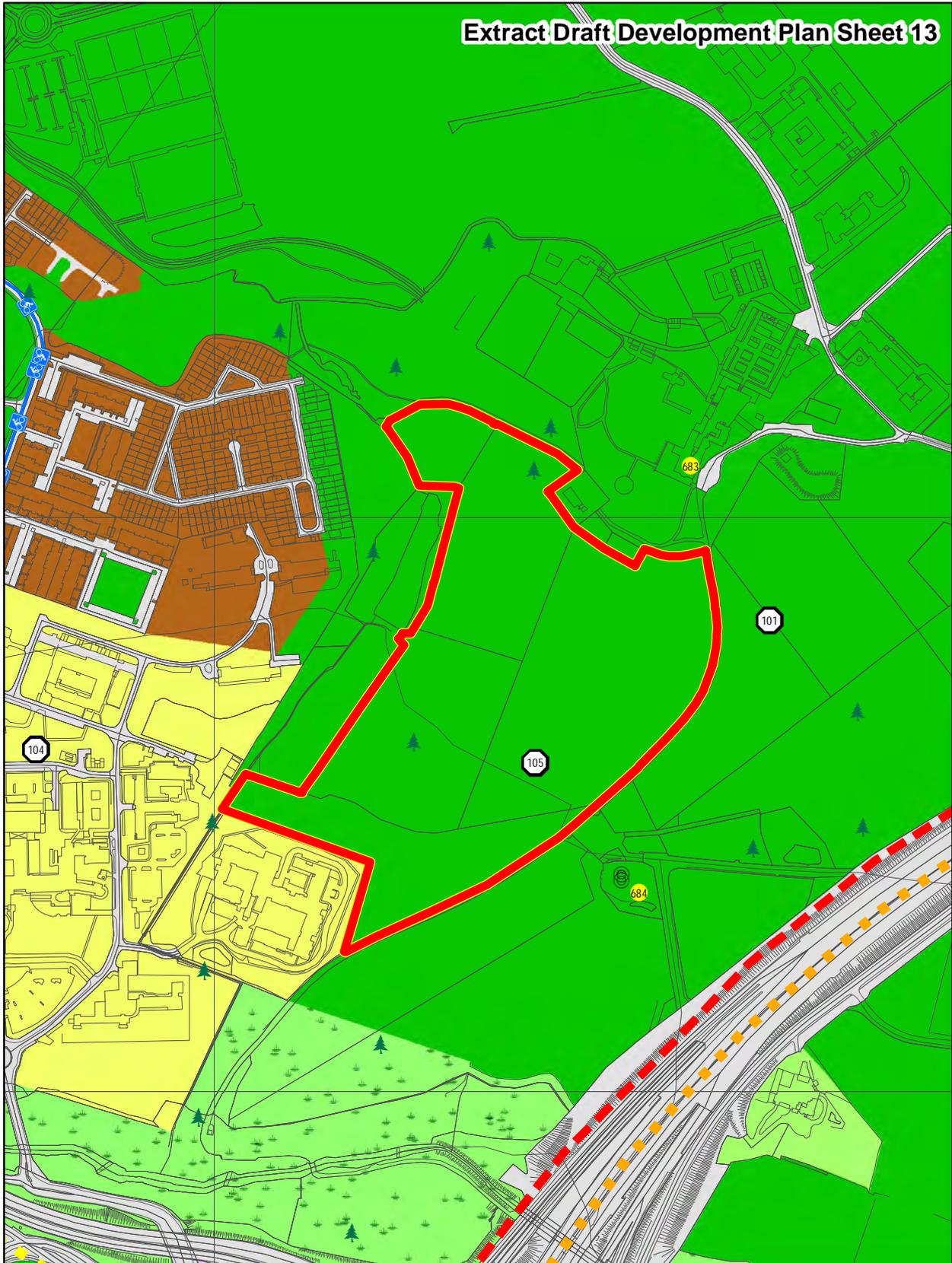
**CE SH 13.7**





**CE SH 13.8**



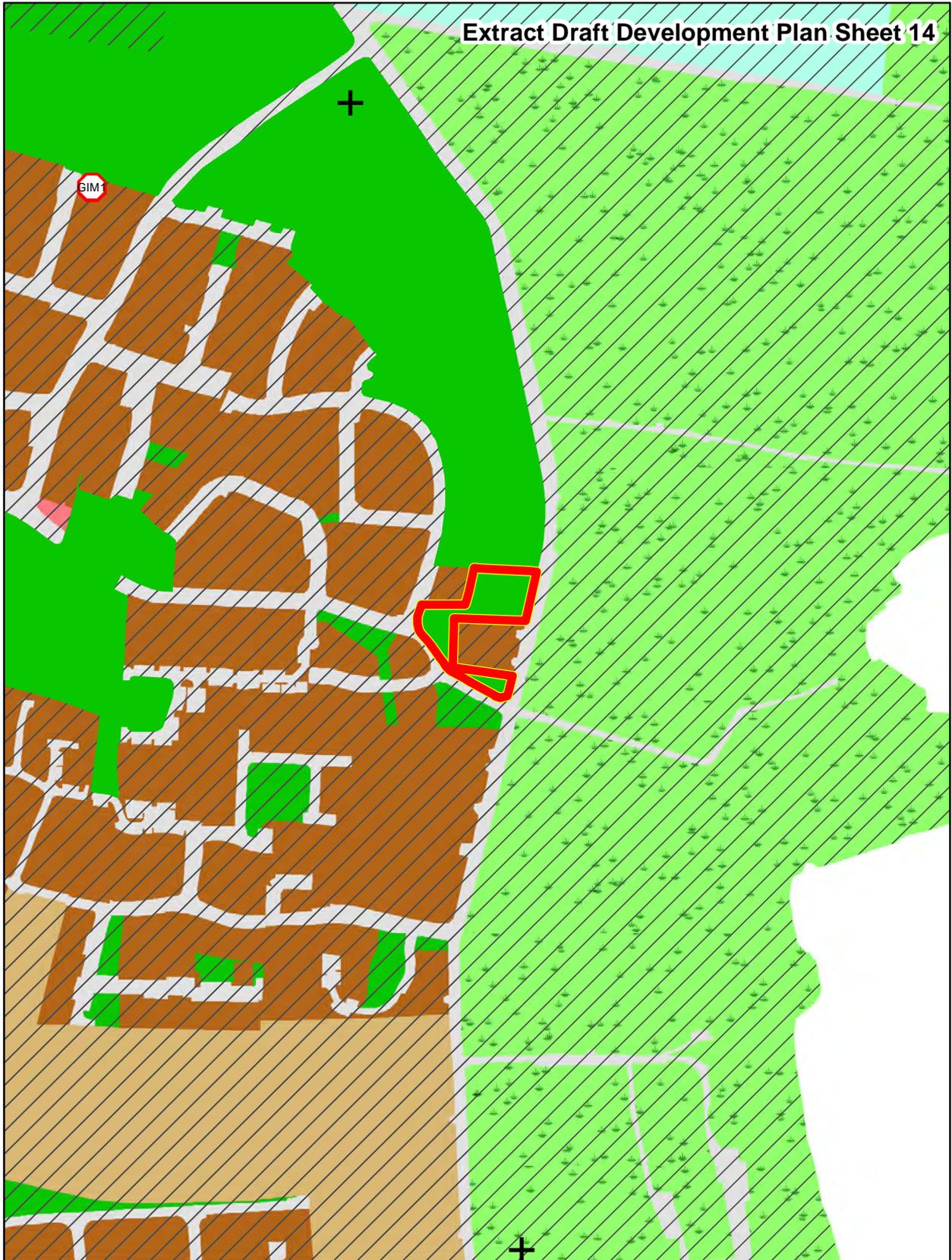


0 50 100 200 300 400 500 600 700 800 Meters



CE SH 13.11



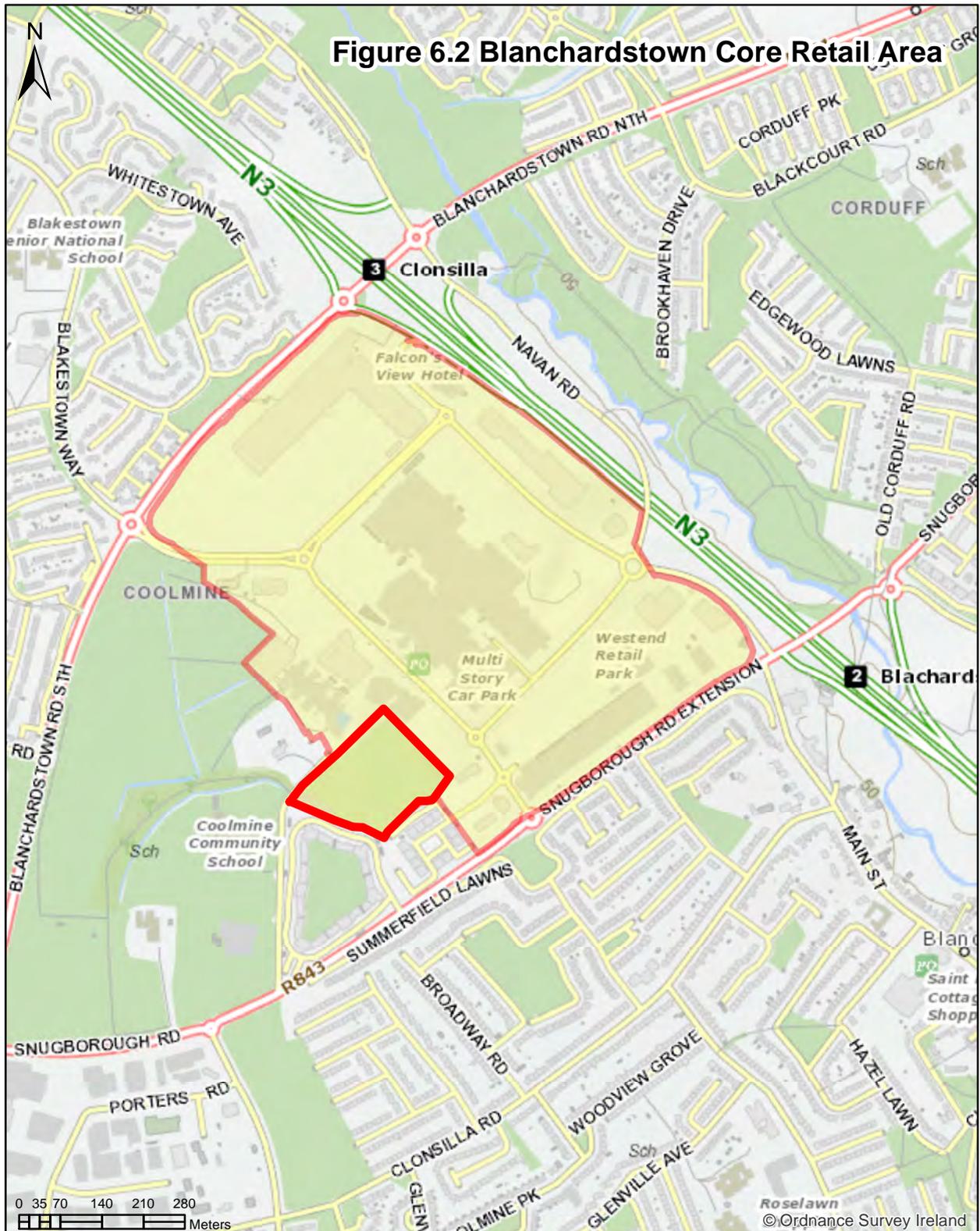


0 40 80 160 240 320 400 480 560 640 Meters

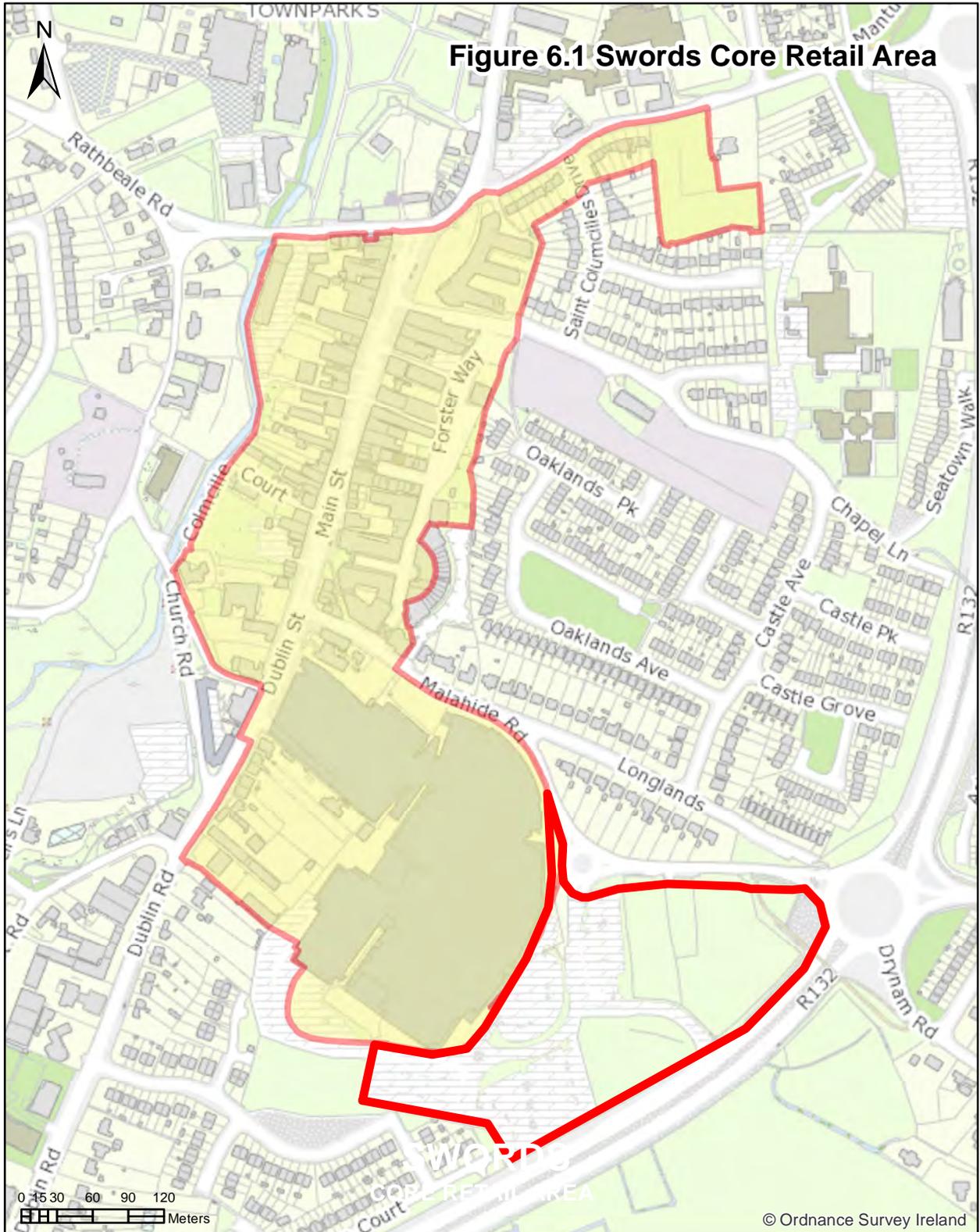


CE SH 14.1





 **CE CH 4.4 and CE CH 6.4**



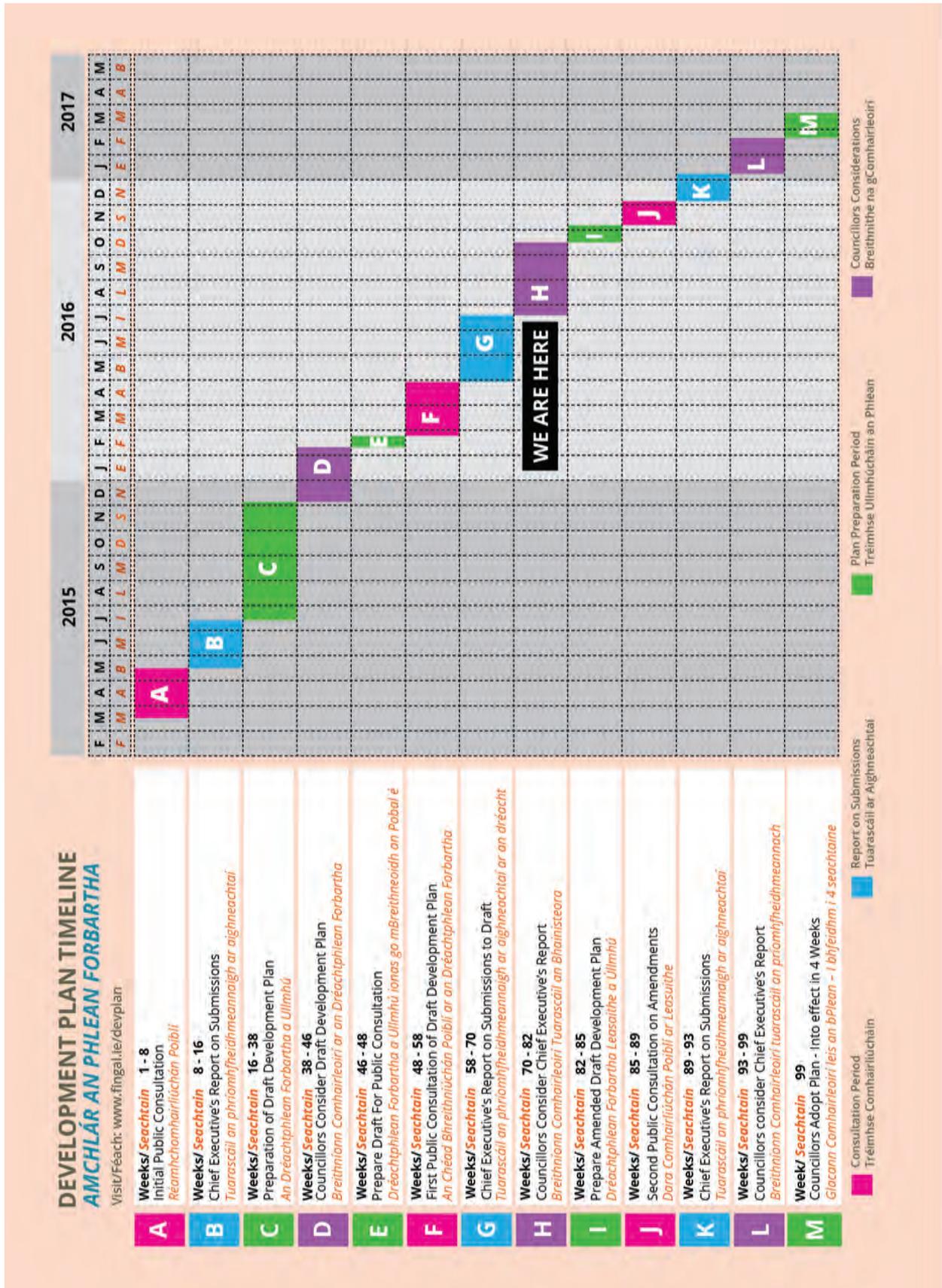
 **CE CH 6.4**

# APPENDIX B



## DEVELOPMENT PLAN TIMELINE







# APPENDIX C



## LIST OF ALL SUBMISSIONS RECEIVED



# APPENDIX C

Submission Reference	CVQ ID	Submitter	Company/Agent
D00002/2018	<a href="#">CVQ-2128</a>	Neil Peirce	
D00003/2018	<a href="#">CVQ-2134</a>	Paul Corcoran	
D00008/2018	<a href="#">CVQ-2156</a>	Jennifer Kealy	
D00010/2018	<a href="#">CVQ-2225</a>	Tony Graham	
D00011/2018	<a href="#">CVQ-2228</a>	Séan Carthy	ODA Architecture
D00012/2018	<a href="#">CVQ-2222</a>	Sunil Kumar	
D00018/2018	<a href="#">CVQ-2266</a>	William Malone	
D00019/2018	<a href="#">CVQ-2268</a>	Breda McNally	A.C.Architecture
D00020/2018	<a href="#">CVQ-2270</a>	Barbara McDonnell	A.C.Architecture
D00022/2018	<a href="#">CVQ-2274</a>	S. Mullen & P.Grimes	Vincent JP Farry & Co. Ltd..
D00023/2018	<a href="#">CVQ-2277</a>	Sarah Miley	
D00024/2018	<a href="#">CVQ-2281</a>	Brendan & Catherine Bardin	Michael Halligan Planning Consultants
D00025/2018	<a href="#">CVQ-2283</a>	David Pratt	Michael Halligan Planning Consultants
D00026/2018	<a href="#">CVQ-2285</a>	Hamilton Park Care Centre Ltd..	Michael Halligan Planning Consultants
D00027/2018	<a href="#">CVQ-2280</a>	Sinead O'Halloran	Michael Halligan Planning Consultants
D00028/2018	<a href="#">CVQ-2289</a>	Shane Hogan	
D00029/2018	<a href="#">CVQ-2291</a>	Fiona Mulligan	
D00030/2018	<a href="#">CVQ-2296</a>	Margaret Lawlor	
D00031/2018	<a href="#">CVQ-2299</a>	Ciaran O'Brien	ODA Architecture
D00032/2018	<a href="#">CVQ-2301</a>	Robbie Sinnott	
D00034/2018	<a href="#">CVQ-2346</a>	Mary & Donal Wyse	
D00035/2018	<a href="#">CVQ-2349</a>	Meakstown Community Council	
D00036/2018	<a href="#">CVQ-2351</a>	Meakstown Community Council	
D00037/2018	<a href="#">CVQ-2353</a>	Richard Shiels	
D00038/2018	<a href="#">CVQ-2356</a>	Paul & Laura Ryan	
D00039/2018	<a href="#">CVQ-2358</a>	Meakstown Community Council	
D00040/2018	<a href="#">CVQ-2362</a>	Brendan O' Brien	
D00041/2018	<a href="#">CVQ-2364</a>	Noel Whelan	
D00042/2018	<a href="#">CVQ-2368</a>	Niall Gosson	
D00043/2018	<a href="#">CVQ-2370</a>	Niall Gosson	
D00045/2018	<a href="#">CVQ-2378</a>	Tullington Ltd, General Partner on behalf of Tribeca Ltd. Partnership	Tom Phillips & Associates
D00046/2018	<a href="#">CVQ-2379</a>	Skerries Rugby Football Club	
D00047/2018	<a href="#">CVQ-2385</a>	Colombia Yachting Ltd..	
D00048/2018	<a href="#">CVQ-2387</a>	Eoin McCann	
D00049/2018	<a href="#">CVQ-2397</a>	Liz Daly Colhoun	
D00050/2018	<a href="#">CVQ-2401</a>	Louise Purcell	
D00051/2018	<a href="#">CVQ-2406</a>	Eastern and Midland Regional Assembly	
D00052/2018	<a href="#">CVQ-2407</a>	Environmental Protection Agency	
D00053/2018	<a href="#">CVQ-2410</a>	Philip Hayes	
D00054/2018	<a href="#">CVQ-2412</a>	Derek Brennan	
D00055/2018	<a href="#">CVQ-2415</a>	Olivia Gray	
D00056/2018	<a href="#">CVQ-2418</a>	Mary Walzer & Claire O'Connor	Hughes Planning & Development Consultants
D00057/2018	<a href="#">CVQ-2420</a>	John Fitzgerald	
D00058/2018	<a href="#">CVQ-2409</a>	Robert Corri	
D00059/2018	<a href="#">CVQ-2432</a>	Paul Doyle	
D00060/2018	<a href="#">CVQ-2404</a>	Lidl Ireland GmbH	The Planning Partnership
D00061/2018	<a href="#">CVQ-2434</a>	Peter Dungan	
D00062/2018	<a href="#">CVQ-2423</a>	Olivia Gray	
D00063/2018	<a href="#">CVQ-2249</a>	Caroline Gore-Grimes	
D00065/2018	<a href="#">CVQ-2438</a>	Brian Murray	
D00067/2018	<a href="#">CVQ-2443</a>	Niall Gosson	
D00068/2018	<a href="#">CVQ-2445</a>	Kevin Feeney	
D00069/2018	<a href="#">CVQ-2447</a>	Barina Ltd..	Fenton Associates
D00070/2018	<a href="#">CVQ-2449</a>	Donabate Golf Club	Tuck Planning
D00071/2018	<a href="#">CVQ-2452</a>	David Mc Dowell	
D00072/2018	<a href="#">CVQ-2457</a>	Lusk Community 2020 Sportsplan Committee	
D00073/2018	<a href="#">CVQ-2403</a>	Evelyn Mac Mahon	
D00074/2018	<a href="#">CVQ-2461</a>	Philip Evans	
D00076/2018	<a href="#">CVQ-2464</a>	Helen Hughes	
D00077/2018	<a href="#">CVQ-2467</a>	Daniel Curtin	
D00079/2018	<a href="#">CVQ-2470</a>	Thomas Butterly	
D00080/2018	<a href="#">CVQ-2473</a>	Ann Byrne	
D00081/2018	<a href="#">CVQ-2475</a>	Grainne Somers	

# APPENDIX C

Submission Reference	CVQ ID	Submitter	Company/Agent
D00082/2018	<a href="#">CVQ-2477</a>	Rachael Edwards	
D00083/2018	<a href="#">CVQ-2480</a>	Liam Foran	
D00084/2018	<a href="#">CVQ-2482</a>	Pat Monks	
D00085/2018	<a href="#">CVQ-2485</a>	Edel Grimes	
D00086/2018	<a href="#">CVQ-2487</a>	Veceslavs Stalmacenoks	
D00087/2018	<a href="#">CVQ-2489</a>	Niall Hogan	
D00088/2018	<a href="#">CVQ-2491</a>	Colm Seery	
D00089/2018	<a href="#">CVQ-2493</a>	Pat O'Hanlon	
D00090/2018	<a href="#">CVQ-2479</a>	Greenridge Court Residents	
D00091/2018	<a href="#">CVQ-2495</a>	Mr Vladimirs	
D00092/2018	<a href="#">CVQ-2497</a>	Mary Brogan	
D00093/2018	<a href="#">CVQ-2499</a>	Cian Tracey	
D00095/2018	<a href="#">CVQ-2513</a>	John Hamilton	Michael Halligan Planning Consultants
D00096/2018	<a href="#">CVQ-2516</a>	Lusk Athletic Club	
D00097/2018	<a href="#">CVQ-2518</a>	James Fitzgerald	
D00098/2018	<a href="#">CVQ-2522</a>	Sean Walsh	
D00099/2018	<a href="#">CVQ-2524</a>	Caoimin O'Conceannainn	
D00100/2018	<a href="#">CVQ-2528</a>	Marie Dillon	
D00101/2018	<a href="#">CVQ-2530</a>	Jessica Leonard	
D00102/2018	<a href="#">CVQ-2532</a>	Andrew Kenny	
D00103/2018	<a href="#">CVQ-2534</a>	Rebecca Reilly	
D00104/2018	<a href="#">CVQ-2536</a>	Susan Curley	
D00105/2018	<a href="#">CVQ-2538</a>	Lydia Branagan	
D00106/2018	<a href="#">CVQ-2540</a>	Sinead Mooney	
D00107/2018	<a href="#">CVQ-2542</a>	Gerald Collins	
D00108/2018	<a href="#">CVQ-2545</a>	Paul Fitzgerald	
D00109/2018	<a href="#">CVQ-2548</a>	Katrina Reynolds	
D00110/2018	<a href="#">CVQ-2520</a>	John Earley	
D00111/2018	<a href="#">CVQ-2526</a>	Martin Branagan	
D00112/2018	<a href="#">CVQ-2550</a>	Carolyn Roberts	
D00113/2018	<a href="#">CVQ-2554</a>	Audrey Fanthorpe	
D00114/2018	<a href="#">CVQ-2556</a>	Lynda Halpin	
D00115/2018	<a href="#">CVQ-2558</a>	Adriana Romero	
D00116/2018	<a href="#">CVQ-2560</a>	Máire O'Laughlin	
D00117/2018	<a href="#">CVQ-2562</a>	Joanne Farrell	
D00118/2018	<a href="#">CVQ-2565</a>	Sarah Louise Brogan	
D00119/2018	<a href="#">CVQ-2567</a>	Jacinta Reddin	
D00120/2018	<a href="#">CVQ-2569</a>	Gráinne Clare	
D00121/2018	<a href="#">CVQ-2571</a>	Emily Bissett	
D00122/2018	<a href="#">CVQ-2573</a>	Alan Tracey	
D00123/2018	<a href="#">CVQ-2575</a>	Deborah Monks	
D00124/2018	<a href="#">CVQ-2577</a>	Brendan Dillon	
D00125/2018	<a href="#">CVQ-2579</a>	Shane King	
D00126/2018	<a href="#">CVQ-2581</a>	Ken Mariur	
D00127/2018	<a href="#">CVQ-2583</a>	Maryann McDonald	
D00130/2018	<a href="#">CVQ-2588</a>	Stephen Hegarty	
D00131/2018	<a href="#">CVQ-2589</a>	Siobhan O'Regan	
D00132/2018	<a href="#">CVQ-2594</a>	Martin Farrell	
D00133/2018	<a href="#">CVQ-2596</a>	Bert Griffith	
D00134/2018	<a href="#">CVQ-2598</a>	Joe Thurstans	
D00135/2018	<a href="#">CVQ-2599</a>	James Osbourne	
D00136/2018	<a href="#">CVQ-2602</a>	Adrienne Hughes	
D00137/2018	<a href="#">CVQ-2604</a>	Aileen Sweeney	
D00138/2018	<a href="#">CVQ-2606</a>	Ellenor Tracey	
D00139/2018	<a href="#">CVQ-2608</a>	Desmond O'Loughlin	
D00140/2018	<a href="#">CVQ-2610</a>	Derek McGrath	
D00141/2018	<a href="#">CVQ-2612</a>	David Quinn	
D00142/2018	<a href="#">CVQ-2614</a>	Maureen Redmond	
D00143/2018	<a href="#">CVQ-2616</a>	Fiona Savage	
D00144/2018	<a href="#">CVQ-2617</a>	Linda Butterly	
D00145/2018	<a href="#">CVQ-2621</a>	Brid Smith	
D00146/2018	<a href="#">CVQ-2623</a>	Joseph Foley	
D00147/2018	<a href="#">CVQ-2624</a>	Liam Clare	
D00148/2018	<a href="#">CVQ-2626</a>	Dana Cullen	
D00149/2018	<a href="#">CVQ-2630</a>	Fionnuala Kelly	
D00150/2018	<a href="#">CVQ-2631</a>	Ursula Bond	
D00151/2018	<a href="#">CVQ-2634</a>	M Fenlon	

# APPENDIX C

Submission Reference	CVQ ID	Submitter	Company/Agent
D00152/2018	<a href="#">CVQ-2636</a>	Sean Ryan	
D00153/2018	<a href="#">CVQ-2638</a>	Tharappel Jawen	
D00154/2018	<a href="#">CVQ-2640</a>	Thomas Redmond	
D00155/2018	<a href="#">CVQ-2642</a>	Emmet Tracey	
D00156/2018	<a href="#">CVQ-2644</a>	Brian Foley	
D00157/2018	<a href="#">CVQ-2646</a>	Cllr. Barry Martin	
D00158/2018	<a href="#">CVQ-2648</a>	Argentum Property Holding Two Ltd..	Stephen Little & Associates
D00159/2018	<a href="#">CVQ-2650</a>	Wojtek Sokolowski	
D00160/2018	<a href="#">CVQ-2652</a>	Eamon Russell	
D00161/2018	<a href="#">CVQ-2654</a>	Shay Hayden	
D00162/2018	<a href="#">CVQ-2656</a>	Rachael Leonard Long	
D00163/2018	<a href="#">CVQ-2658</a>	Peter Coyle	
D00164/2018	<a href="#">CVQ-2660</a>	Swords Manor Football Club	
D00165/2018	<a href="#">CVQ-2662</a>	Joan Bird	
D00166/2018	<a href="#">CVQ-2664</a>	Liam Kearns	
D00167/2018	<a href="#">CVQ-2666</a>	Margaret Dobinson	
D00168/2018	<a href="#">CVQ-2668</a>	Chris Farrell	
D00169/2018	<a href="#">CVQ-2670</a>	Tom Sweeney	
D00170/2018	<a href="#">CVQ-2674</a>	Versonwood c/o Duff & Phelps (Irl) Ltd..	The Planning Partnership
D00171/2018	<a href="#">CVQ-2592</a>	Mike Woods	
D00172/2018	<a href="#">CVQ-2587</a>	Patrick O'Byrne	
D00173/2018	<a href="#">CVQ-2678</a>	Matt Davis	
D00175/2018	<a href="#">CVQ-2681</a>	Fionán McCulloch	
D00176/2018	<a href="#">CVQ-2683</a>	Patricia Gorman	
D00177/2018	<a href="#">CVQ-2685</a>	Susan Foley	
D00178/2018	<a href="#">CVQ-2687</a>	Laurence Somers	
D00179/2018	<a href="#">CVQ-2689</a>	Frances Hughes	
D00180/2018	<a href="#">CVQ-2691</a>	Louis Kilmartin	
D00181/2018	<a href="#">CVQ-2693</a>	Gerard Benson	
D00183/2018	<a href="#">CVQ-2696</a>	George Cunningham	Peter P. Gillett & Associates
D00184/2018	<a href="#">CVQ-2698</a>	Kimpton Vale Ltd	Peter P. Gillett & Associates
D00185/2018	<a href="#">CVQ-2701</a>	Beaverstown Golf Club	
D00186/2018	<a href="#">CVQ-2704</a>	Fáilte Ireland	
D00187/2018	<a href="#">CVQ-2710</a>	Kate Cullen	
D00188/2018	<a href="#">CVQ-2714</a>	Balbriggan Community Council	
D00189/2018	<a href="#">CVQ-2716</a>	Balbriggan Community Council	
D00190/2018	<a href="#">CVQ-2718</a>	Balbriggan Community Council	
D00191/2018	<a href="#">CVQ-2722</a>	Ballyboughal Hedgerow Society	
D00192/2018	<a href="#">CVQ-2728</a>	Pearse Ryan	
D00193/2018	<a href="#">CVQ-2708</a>	Michelle Wogan	
D00194/2018	<a href="#">CVQ-2730</a>	McCann Family	Bell Associates
D00195/2018	<a href="#">CVQ-2731</a>	PJ O'Hara	
D00196/2018	<a href="#">CVQ-2734</a>	Shane Redmond	
D00197/2018	<a href="#">CVQ-2735</a>	Karen McCann	Bell Associates
D00198/2018	<a href="#">CVQ-2738</a>	Chrostopher McCann	
D00199/2018	<a href="#">CVQ-2740</a>	Gerry Salmon	
D00200/2018	<a href="#">CVQ-2742</a>	Fiona O'Loughlin	
D00201/2018	<a href="#">CVQ-2745</a>	J. Donnelly	
D00202/2018	<a href="#">CVQ-2747</a>	Jim Rocks	
D00203/2018	<a href="#">CVQ-2749</a>	Mary Kelly	
D00204/2018	<a href="#">CVQ-2751</a>	Siobhan Sweetman	
D00205/2018	<a href="#">CVQ-2753</a>	Catherine Sheppard	
D00206/2018	<a href="#">CVQ-2755</a>	Paul Mc Allister Snr	
D00207/2018	<a href="#">CVQ-2757</a>	Owen Lumley	
D00208/2018	<a href="#">CVQ-2759</a>	Paddy Fallon	
D00209/2018	<a href="#">CVQ-2762</a>	Karl Gorman	
D00210/2018	<a href="#">CVQ-2764</a>	Mary Walsh	
D00211/2018	<a href="#">CVQ-2766</a>	Patrick Foley	
D00212/2018	<a href="#">CVQ-2768</a>	Jackie Marks	
D00213/2018	<a href="#">CVQ-2726</a>	Institute of Technology Blanchardstown	
D00214/2018	<a href="#">CVQ-2771</a>	Paula Redmond	
D00215/2018	<a href="#">CVQ-2773</a>	Paul Dardis	
D00216/2018	<a href="#">CVQ-2775</a>	Paul Mc Allister Jnr	
D00217/2018	<a href="#">CVQ-2777</a>	Susan O' Sullivan	
D00218/2018	<a href="#">CVQ-2760</a>	Geraldine Warren	

# APPENDIX C

Submission Reference	CVQ ID	Submitter	Company/Agent
D00219/2018	<a href="#">CVQ-2779</a>	Fintan McAllister	
D00220/2018	<a href="#">CVQ-2780</a>	Gareth Sweetman	
D00221/2018	<a href="#">CVQ-2784</a>	Michael Gilmore	
D00222/2018	<a href="#">CVQ-2786</a>	Sínead Fallon	
D00223/2018	<a href="#">CVQ-2787</a>	Deirdre Farrell	
D00224/2018	<a href="#">CVQ-2790</a>	Geraldine Halpin	
D00225/2018	<a href="#">CVQ-2293</a>	Elmgreen Nursing Home	
D00226/2018	<a href="#">CVQ-2793</a>	Alan Sheppard	
D00227/2018	<a href="#">CVQ-2795</a>	Genvest Unlimited	
D00228/2018	<a href="#">CVQ-2797</a>	John Tarpey	
D00229/2018	<a href="#">CVQ-2799</a>	John Tarpey	
D00230/2018	<a href="#">CVQ-2676</a>	Marie Cummins	
D00232/2018	<a href="#">CVQ-2806</a>	Paddy Foy	
D00233/2018	<a href="#">CVQ-2811</a>	Lusk Community Council	
D00234/2018	<a href="#">CVQ-2807</a>	Colette Halpin	
D00235/2018	<a href="#">CVQ-2814</a>	Doreen Keaney	
D00236/2018	<a href="#">CVQ-2819</a>	Ann McLoone	
D00237/2018	<a href="#">CVQ-2821</a>	Graham Lumley	
D00238/2018	<a href="#">CVQ-2823</a>	Corie Markey	
D00239/2018	<a href="#">CVQ-2824</a>	Donal & Hillary Pratt, Robert White	AKM Consultants
D00240/2018	<a href="#">CVQ-2830</a>	Ian Courtney	
D00241/2018	<a href="#">CVQ-2831</a>	David Mohan	
D00242/2018	<a href="#">CVQ-2834</a>	David McAllister	
D00243/2018	<a href="#">CVQ-2835</a>	Bruce Wood	
D00244/2018	<a href="#">CVQ-2829</a>	Lusk Utd A.F.C.	
D00245/2018	<a href="#">CVQ-2839</a>	Malcolm Slattery	
D00246/2018	<a href="#">CVQ-2841</a>	Kevin McGuinness	
D00247/2018	<a href="#">CVQ-2843</a>	Tony Craig	
D00248/2018	<a href="#">CVQ-2826</a>	North Beach Caravan Park	
D00249/2018	<a href="#">CVQ-2846</a>	Tony O' Hara	
D00250/2018	<a href="#">CVQ-2848</a>	Bernard Morgan	
D00251/2018	<a href="#">CVQ-2850</a>	Joseph Moore	
D00252/2018	<a href="#">CVQ-2852</a>	Avril Byrne	
D00253/2018	<a href="#">CVQ-2854</a>	Caroline Berg	
D00254/2018	<a href="#">CVQ-2855</a>	John Redmond	
D00255/2018	<a href="#">CVQ-2858</a>	Dorothy Mc Murtry	
D00256/2018	<a href="#">CVQ-2859</a>	Maurice Butterly	
D00257/2018	<a href="#">CVQ-2862</a>	Stella Smith	
D00258/2018	<a href="#">CVQ-2864</a>	John Butterly	
D00259/2018	<a href="#">CVQ-2865</a>	Elizabeth McMahon	
D00260/2018	<a href="#">CVQ-2868</a>	Brid Sweetman	
D00261/2018	<a href="#">CVQ-2870</a>	Claire Butterly	
D00262/2018	<a href="#">CVQ-2872</a>	Shane Halpin	
D00263/2018	<a href="#">CVQ-2875</a>	Shirley Peyten	
D00264/2018	<a href="#">CVQ-2879</a>	The Occupier	
D00265/2018	<a href="#">CVQ-2882</a>	Keith Beirne	
D00266/2018	<a href="#">CVQ-2884</a>	Patrick Coen	
D00267/2018	<a href="#">CVQ-2886</a>	James Mansfield	
D00268/2018	<a href="#">CVQ-2889</a>	George Salmon	
D00269/2018	<a href="#">CVQ-2891</a>	Mick McKeever	
D00270/2018	<a href="#">CVQ-2894</a>	Eamon O'Regan	
D00271/2018	<a href="#">CVQ-2896</a>	Seán Compton	
D00272/2018	<a href="#">CVQ-2893</a>	Brian O'Connor	
D00273/2018	<a href="#">CVQ-2899</a>	Vincent McDonnell	
D00274/2018	<a href="#">CVQ-2877</a>	Ann Gilmore	
D00275/2018	<a href="#">CVQ-2902</a>	Transport Infrastructure Ireland	
D00276/2018	<a href="#">CVQ-2904</a>	Neil Dunne	
D00277/2018	<a href="#">CVQ-2906</a>	Sorcha Dillon	
D00278/2018	<a href="#">CVQ-2908</a>	Wojwedi Soder	
D00279/2018	<a href="#">CVQ-2910</a>	Maureen McGee	
D00280/2018	<a href="#">CVQ-2913</a>	Alison McCulloch	
D00281/2018	<a href="#">CVQ-2912</a>	Joanne Creevy	
D00282/2018	<a href="#">CVQ-2804</a>	Paddy Foy	
D00283/2018	<a href="#">CVQ-2921</a>	Balbriggan Community Council	
D00284/2018	<a href="#">CVQ-2923</a>	Balbriggan Community Council	
D00285/2018	<a href="#">CVQ-2926</a>	Mark Murphy	
D00286/2018	<a href="#">CVQ-2928</a>	Jennifer Sweetman	
D00287/2018	<a href="#">CVQ-2930</a>	M. Tracey	

# APPENDIX C

Submission Reference	CVQ ID	Submitter	Company/Agent
D00288/2018	<a href="#">CVQ-2932</a>	Jack Murphy	Hughes Planning & Development Consultants
D00289/2018	<a href="#">CVQ-2935</a>	Joy Barrett	
D00290/2018	<a href="#">CVQ-2937</a>	Peter O' Brien	
D00291/2018	<a href="#">CVQ-2939</a>	Mairead Sweetman	
D00292/2018	<a href="#">CVQ-2941</a>	Joy Sutton	
D00293/2018	<a href="#">CVQ-2943</a>	Owen Mc Ginty	
D00294/2018	<a href="#">CVQ-2945</a>	Des Foley	
D00295/2018	<a href="#">CVQ-2947</a>	Joe Mc Grath	
D00296/2018	<a href="#">CVQ-2949</a>	Patrick Kirwan	
D00297/2018	<a href="#">CVQ-2951</a>	Kieran Purcell	
D00298/2018	<a href="#">CVQ-2953</a>	Glynis Willcox	
D00299/2018	<a href="#">CVQ-2955</a>	Kiernan Hughes	
D00300/2018	<a href="#">CVQ-2957</a>	Mary A. Price	
D00301/2018	<a href="#">CVQ-2959</a>	Michael Price	
D00302/2018	<a href="#">CVQ-2961</a>	B Smyth	
D00303/2018	<a href="#">CVQ-2965</a>	Sandra Sweetman	
D00304/2018	<a href="#">CVQ-2967</a>	Henry Peyton	
D00305/2018	<a href="#">CVQ-2963</a>	Tony O'Connor	
D00306/2018	<a href="#">CVQ-2970</a>	Freda Winters	
D00307/2018	<a href="#">CVQ-2972</a>	Stephen McMahon	
D00308/2018	<a href="#">CVQ-2974</a>	James O'Rourke	
D00309/2018	<a href="#">CVQ-2976</a>	Tony Bonass	
D00310/2018	<a href="#">CVQ-2978</a>	Breda Sweetman	
D00311/2018	<a href="#">CVQ-2980</a>	Liam Halpin	
D00312/2018	<a href="#">CVQ-2982</a>	N. Campbell	
D00313/2018	<a href="#">CVQ-2988</a>	Derek Redmond	
D00315/2018	<a href="#">CVQ-2995</a>	Owen Hart	
D00316/2018	<a href="#">CVQ-2984</a>	Stephen Farrell	
D00317/2018	<a href="#">CVQ-2991</a>	Moore Family	
D00318/2018	<a href="#">CVQ-2999</a>	Anthony Rooney	
D00319/2018	<a href="#">CVQ-3004</a>	Joe Butterly	Hughes Planning & Development Consultants
D00320/2018	<a href="#">CVQ-3003</a>	William Wogan	
D00321/2018	<a href="#">CVQ-3006</a>	Sinead Murphy	Hughes Planning & Development Consultants
D00322/2018	<a href="#">CVQ-2817</a>	Martina Wogan	
D00323/2018	<a href="#">CVQ-3009</a>	Ross Kiernan	Hughes Planning & Development Consultants
D00324/2018	<a href="#">CVQ-3011</a>	Sean Byrne	
D00325/2018	<a href="#">CVQ-2389</a>	Balbriggan Basketball Club (Irish Vikings)	
D00326/2018	<a href="#">CVQ-3013</a>	Paul White	Hughes Planning & Development Consultants
D00327/2018	<a href="#">CVQ-3016</a>	Joe O'Brien	
D00328/2018	<a href="#">CVQ-3021</a>	Regina McCaghy	
D00329/2018	<a href="#">CVQ-3023</a>	Patrick Jones	
D00330/2018	<a href="#">CVQ-3026</a>	Mark Kealy	
D00331/2018	<a href="#">CVQ-3027</a>	Raymond Fox	
D00332/2018	<a href="#">CVQ-3034</a>	Balbriggan Community Council	
D00333/2018	<a href="#">CVQ-3039</a>	Balbriggan Community Council	
D00334/2018	<a href="#">CVQ-3041</a>	Balbriggan Community Council	
D00335/2018	<a href="#">CVQ-3043</a>	Balbriggan Community Council	
D00336/2018	<a href="#">CVQ-3046</a>	Balbriggan Community Council	
D00337/2018	<a href="#">CVQ-3048</a>	Balbriggan Community Council	
D00338/2018	<a href="#">CVQ-3051</a>	Balbriggan Chamber of Commerce Limited	
D00339/2018	<a href="#">CVQ-2429</a>	Nicky Leonard	
D00340/2018	<a href="#">CVQ-3054</a>	Paula Foley	
D00341/2018	<a href="#">CVQ-3056</a>	SSA Architects	
D00342/2018	<a href="#">CVQ-3058</a>	Anne Carrick	
D00343/2018	<a href="#">CVQ-3060</a>	Sinead O' Reilly	
D00344/2018	<a href="#">CVQ-3063</a>	Gerard Sweetman	
D00345/2018	<a href="#">CVQ-3066</a>	Kevin Murray	
D00346/2018	<a href="#">CVQ-3068</a>	Loretta Fagan	
D00347/2018	<a href="#">CVQ-3064</a>	Bart O'Brien	
D00348/2018	<a href="#">CVQ-3070</a>	Colette Murray	
D00349/2018	<a href="#">CVQ-3072</a>	John O' Reilly	
D00350/2018	<a href="#">CVQ-3073</a>	Paul Sheeran	Marston Planning Consultancy

# APPENDIX C

Submission Reference	CVQ ID	Submitter	Company/Agent
D00351/2018	<a href="#">CVQ-3077</a>	Ann O' Reilly	
D00352/2018	<a href="#">CVQ-3079</a>	Laura Mc Allister	
D00353/2018	<a href="#">CVQ-3080</a>	J Smyth	
D00354/2018	<a href="#">CVQ-3083</a>	David Carrick	
D00355/2018	<a href="#">CVQ-3085</a>	Peter Dempsey	
D00356/2018	<a href="#">CVQ-2993</a>	Austin Hughes	
D00357/2018	<a href="#">CVQ-3087</a>	Carthy's Lane Residents Association (CLaRA)	Project Architects/SDR
D00358/2018	<a href="#">CVQ-3089</a>	Verona Sports & Leisure Club	
D00359/2018	<a href="#">CVQ-3091</a>	Laura Dempsey	
D00360/2018	<a href="#">CVQ-3093</a>	Mairead Mc Allister	
D00361/2018	<a href="#">CVQ-3095</a>	Channor Ltd	AOS Planning Ltd
D00362/2018	<a href="#">CVQ-3096</a>	Therese Lee	
D00363/2018	<a href="#">CVQ-3099</a>	Paddy Lee	
D00364/2018	<a href="#">CVQ-3101</a>	Joseph O' Reilly	
D00365/2018	<a href="#">CVQ-3103</a>	Michael Lee	
D00366/2018	<a href="#">CVQ-3105</a>	Geraldine Fagan	
D00367/2018	<a href="#">CVQ-3107</a>	Barry Mc Allister	
D00368/2018	<a href="#">CVQ-3110</a>	Uniplumo (Ireland) Ltd..	Hughes Planning & Development Consultants
D00369/2018	<a href="#">CVQ-3114</a>	Elsie Morgan	Hughes Planning & Development Consultants
D00370/2018	<a href="#">CVQ-3116</a>	Justin Flower	O'Connor Whelan Planning Consultants
D00371/2018	<a href="#">CVQ-3117</a>	Seamus Tynan	
D00372/2018	<a href="#">CVQ-3120</a>	Ciara Fagan	
D00373/2018	<a href="#">CVQ-3113</a>	Rory Scannell	
D00374/2018	<a href="#">CVQ-3123</a>	Grainne Lee	
D00375/2018	<a href="#">CVQ-3125</a>	Conor Foley	
D00376/2018	<a href="#">CVQ-3127</a>	Kevin Kelly	
D00377/2018	<a href="#">CVQ-3129</a>	Sarah Gorman	
D00378/2018	<a href="#">CVQ-3131</a>	Mark Halpin	
D00379/2018	<a href="#">CVQ-3133</a>	Paul Hughes	
D00380/2018	<a href="#">CVQ-3136</a>	Stephen Bannon	Hughes Planning & Development Consultants
D00381/2018	<a href="#">CVQ-3137</a>	Patrick Carrick	
D00382/2018	<a href="#">CVQ-3141</a>	Emily Gorman	
D00383/2018	<a href="#">CVQ-3143</a>	Aldi Stores (Ireland) Limited	O'Connor Whelan Planning Consultants
D00384/2018	<a href="#">CVQ-3144</a>	John Smith	Hughes Planning & Development Consultants
D00385/2018	<a href="#">CVQ-3148</a>	Darius Krasnodenskis	
D00386/2018	<a href="#">CVQ-3147</a>	The Heart Foundation	
D00387/2018	<a href="#">CVQ-3151</a>	Baiba Zalcmane	
D00388/2018	<a href="#">CVQ-3152</a>	John Prunty	
D00389/2018	<a href="#">CVQ-3155</a>	Hugh Swanton	
D00390/2018	<a href="#">CVQ-3158</a>	Laurence Douglas	
D00391/2018	<a href="#">CVQ-3161</a>	Grainne Monks	
D00392/2018	<a href="#">CVQ-3163</a>	Aisling Lee	
D00393/2018	<a href="#">CVQ-3166</a>	Patrick Fagan	
D00394/2018	<a href="#">CVQ-3165</a>	Denis Hurley	
D00395/2018	<a href="#">CVQ-3168</a>	Robert Lee	
D00396/2018	<a href="#">CVQ-3170</a>	Grainne Healy	
D00397/2018	<a href="#">CVQ-3174</a>	Grainne Browner	
D00398/2018	<a href="#">CVQ-3176</a>	Phillip Cleere	
D00399/2018	<a href="#">CVQ-2888</a>	Ian & Orla McNally	Mark G Kelly Architects
D00400/2018	<a href="#">CVQ-2915</a>	Ian, Orla & Edward McNally	Mark G Kelly Architects
D00401/2018	<a href="#">CVQ-3181</a>	Lidl Ireland GmbH	BMA Planning & Development Consultants
D00403/2018	<a href="#">CVQ-3177</a>	Ken Waldron	
D00404/2018	<a href="#">CVQ-3185</a>	Paddy McKittrick	
D00405/2018	<a href="#">CVQ-3193</a>	Annur Islamic Foundation Blabriggan Ltd	Cunnane Stratton Reynolds
D00406/2018	<a href="#">CVQ-3196</a>	Kimpton Vale Ltd	John Spain Associates
D00407/2018	<a href="#">CVQ-3197</a>	Sandra Collins	G.R. Henderson & Associates
D00408/2018	<a href="#">CVQ-3200</a>	Glasnevin Trust	John Spain Associates
D00409/2018	<a href="#">CVQ-3206</a>	Park Developments Trust	John Spain Associates
D00410/2018	<a href="#">CVQ-3195</a>	Paul O'Sullivan	
D00411/2018	<a href="#">CVQ-3209</a>	John O'Donohue Insurances Ltd	

# APPENDIX C

Submission Reference	CVQ ID	Submitter	Company/Agent
D00412/2018	<a href="#">CVQ-3187</a>	Ruth Archbold	
D00413/2018	<a href="#">CVQ-3214</a>	Alhans Ltd (In Receivership) C/o PWC	John Spain Associates
D00414/2018	<a href="#">CVQ-3216</a>	John Smith & Marie Jones	Hughes Planning & Development Consultants
D00415/2018	<a href="#">CVQ-3184</a>	Alan & Eric White	Project Architects/SDR
D00416/2018	<a href="#">CVQ-3218</a>	Adroit Company	Stephen Little & Associates
D00417/2018	<a href="#">CVQ-3222</a>	Killeen Properties Limited	RPS Group
D00418/2018	<a href="#">CVQ-3223</a>	John Grogan	
D00419/2018	<a href="#">CVQ-3224</a>	Irish Water	
D00420/2018	<a href="#">CVQ-3226</a>	St. Annes Church & Parish Centre	Sheridan Woods Architects and Urban Planners Ltd
D00421/2018	<a href="#">CVQ-3230</a>	Birchwell Developments	The Big Space
D00422/2018	<a href="#">CVQ-3221</a>	Crekav Limited Partnership	New Generation Homes
D00423/2018	<a href="#">CVQ-3235</a>	Pat Byrne	
D00424/2018	<a href="#">CVQ-3239</a>	Chandos Investments PLC	John Spain Associates
D00425/2018	<a href="#">CVQ-3236</a>	Neil McDermott	Hughes Planning & Development Consultants
D00426/2018	<a href="#">CVQ-3243</a>	Cherryfield Courts Ltd.	John Spain Associates
D00427/2018	<a href="#">CVQ-3238</a>	Skerries Harps GAA and Camogie Club	
D00428/2018	<a href="#">CVQ-3245</a>	Skerries Harps GAA and Camogie Club	
D00429/2018	<a href="#">CVQ-3247</a>	Denise & Paul Naughton	
D00430/2018	<a href="#">CVQ-3250</a>	Edward Fitzharris	
D00431/2018	<a href="#">CVQ-3253</a>	Anthony Fitzharris	
D00432/2018	<a href="#">CVQ-3251</a>	Skerries Harps GAA and Camogie Club	
D00433/2018	<a href="#">CVQ-3256</a>	Imelda Fitzharris	
D00434/2018	<a href="#">CVQ-3257</a>	Skerries Harps GAA and Camogie Club	
D00435/2018	<a href="#">CVQ-3263</a>	Pat White	Hughes Planning & Development Consultants
D00436/2018	<a href="#">CVQ-3264</a>	Richard Dennehy	
D00437/2018	<a href="#">CVQ-3001</a>	Balheary Par 3 Golf Course	
D00438/2018	<a href="#">CVQ-3268</a>	Anne & John Traynor	
D00439/2018	<a href="#">CVQ-3036</a>	Allison Harford	
D00440/2018	<a href="#">CVQ-2515</a>	Niall Hegarty	
D00441/2018	<a href="#">CVQ-3274</a>	Ciaran Traynor	
D00442/2018	<a href="#">CVQ-3276</a>	Traynor, Dennehy & Fitzharris Families	
D00443/2018	<a href="#">CVQ-3273</a>	Balbriggan Community Council	
D00444/2018	<a href="#">CVQ-3280</a>	Ciaran Traynor	
D00445/2018	<a href="#">CVQ-2918</a>	ISKCON Ireland	
D00446/2018	<a href="#">CVQ-3283</a>	Balbriggan Community Council	
D00447/2018	<a href="#">CVQ-3289</a>	Ciaran Traynor	
D00448/2018	<a href="#">CVQ-3290</a>	Rush and Lusk Educate Together NS	
D00449/2018	<a href="#">CVQ-2919</a>	John Tarpey	
D00450/2018	<a href="#">CVQ-3296</a>	Rush Community Development Committee	
D00451/2018	<a href="#">CVQ-3029</a>	Anne Leonard-Scully	
D00452/2018	<a href="#">CVQ-3297</a>	Siobhan Dwyer	
D00453/2018	<a href="#">CVQ-3302</a>	Joe McPeake	
D00454/2018	<a href="#">CVQ-3303</a>	Phoenix FM Community Radio	
D00455/2018	<a href="#">CVQ-3306</a>	Strawberry Beds Residents Association	
D00456/2018	<a href="#">CVQ-3311</a>	Gregory Hughes	
D00457/2018	<a href="#">CVQ-3313</a>	Pauline McGrath & Mary Burke	Corr & Associates
D00458/2018	<a href="#">CVQ-3317</a>	Knightstone Construction Ltd..	Corr & Associates
D00459/2018	<a href="#">CVQ-3319</a>	Colin Fagan	Corr & Associates
D00460/2018	<a href="#">CVQ-3321</a>	Fintan Price	Corr & Associates
D00461/2018	<a href="#">CVQ-3323</a>	Carroll Produce	Corr & Associates
D00462/2018	<a href="#">CVQ-3325</a>	Rory Flynn	Corr & Associates
D00463/2018	<a href="#">CVQ-3327</a>	Barbara McGuinness	Corr & Associates
D00464/2018	<a href="#">CVQ-3329</a>	Willie Watson	Corr & Associates
D00465/2018	<a href="#">CVQ-3331</a>	Joseph Corr	Corr & Associates
D00466/2018	<a href="#">CVQ-3334</a>	Camilla Lynan	
D00467/2018	<a href="#">CVQ-3338</a>	David Vuhn	
D00468/2018	<a href="#">CVQ-3340</a>	Janet Hughes	
D00469/2018	<a href="#">CVQ-3343</a>	Garret Kelly	
D00470/2018	<a href="#">CVQ-3346</a>	Rachel Wilson	
D00471/2018	<a href="#">CVQ-3349</a>	Paul Kelly	
D00472/2018	<a href="#">CVQ-3337</a>	Eirgrid	
D00473/2018	<a href="#">CVQ-3348</a>	Elgin Energy	
D00474/2018	<a href="#">CVQ-2712</a>	Stephen McNulty	

# APPENDIX C

Submission Reference	CVQ ID	Submitter	Company/Agent
D00475/2018	<a href="#">CVQ-3342</a>	Gary Jones	
D00476/2018	<a href="#">CVQ-3356</a>	Transport Infrastructure Ireland	
D00477/2018	<a href="#">CVQ-3358</a>	Frank & Robert McCarthy	Brock McClure
D00478/2018	<a href="#">CVQ-3355</a>	Dublin 15 Community Council	
D00479/2018	<a href="#">CVQ-3366</a>	Christopher McGuire	
D00480/2018	<a href="#">CVQ-3362</a>	Richard Shiels	
D00481/2018	<a href="#">CVQ-3368</a>	October Investments	Brock McClure
D00482/2018	<a href="#">CVQ-3374</a>	Borg Developments	Stephen Little & Associates
D00483/2018	<a href="#">CVQ-3384</a>	Maurice O' Keeffe	
D00484/2018	<a href="#">CVQ-3387</a>	James Foley	
D00485/2018	<a href="#">CVQ-3389</a>	Esther Murphy	
D00486/2018	<a href="#">CVQ-3391</a>	David Hayes	
D00487/2018	<a href="#">CVQ-3395</a>	Charles Monks	
D00488/2018	<a href="#">CVQ-3394</a>	National Asset Management Agency	
D00489/2018	<a href="#">CVQ-3398</a>	Tempore, Teba, Irish Life Assurance plc & Iput (Pavillions Co-Ownership)	Stephen Little & Associates
D00490/2018	<a href="#">CVQ-3332</a>	Santry Business Park	
D00491/2018	<a href="#">CVQ-3359</a>	Skerries Community Association	
D00492/2018	<a href="#">CVQ-3401</a>	Techrete Ireland Limited	
D00493/2018	<a href="#">CVQ-3402</a>	MKN Properties	Fenton Associates
D00494/2018	<a href="#">CVQ-3409</a>	Barina Properties Group	Fenton Associates
D00495/2018	<a href="#">CVQ-3408</a>	Castleknock Golf Club	John Spain Associates
D00496/2018	<a href="#">CVQ-3413</a>	BDO Ireland, receivers of The McCabe/Daly Partnership	Stephen Little & Associates
D00497/2018	<a href="#">CVQ-3309</a>	Colm Donoghue	
D00498/2018	<a href="#">CVQ-3414</a>	Bridie Carr	KT Designs
D00499/2018	<a href="#">CVQ-3415</a>	Silverstream Healthcare	Fenton Associates
D00500/2018	<a href="#">CVQ-3419</a>	IPUT Management Services Ltd..	John Spain Associates
D00501/2018	<a href="#">CVQ-3417</a>	Parsis Ltd..	MacCabe Durney Barnes
D00502/2018	<a href="#">CVQ-3421</a>	Bristol-Myers Squibb	
D00503/2018	<a href="#">CVQ-3427</a>	The Kelly Timber Group Ltd	Fenton Associates
D00504/2018	<a href="#">CVQ-3430</a>	BDO Ireland, receivers of The McCabe/Daly Partnership	Stephen Little & Associates
D00505/2018	<a href="#">CVQ-3428</a>	Meath County Council	
D00506/2018	<a href="#">CVQ-3436</a>	Crekav Landbank Investments	New Generation Homes
D00507/2018	<a href="#">CVQ-3437</a>	Mount Rochford Residents	
D00508/2018	<a href="#">CVQ-3440</a>	Gembira Ltd	John Spain Associates
D00509/2018	<a href="#">CVQ-2925</a>	James and Ann Bates	TBP Planning & Development Consultants
D00510/2018	<a href="#">CVQ-3432</a>	James Ennis	
D00511/2018	<a href="#">CVQ-3442</a>	Seamus Banim	
D00512/2018	<a href="#">CVQ-3447</a>	Dun Ardagh Holdings Ltd..	Brady Shipman Martin
D00513/2018	<a href="#">CVQ-3411</a>	Keelings	
D00514/2018	<a href="#">CVQ-3451</a>	Green REIT Horizon Ltd..	John Spain Associates
D00515/2018	<a href="#">CVQ-3453</a>	Costco Wholesale Ltd	RPS Group
D00516/2018	<a href="#">CVQ-3459</a>	Bovale Developments	BMA Planning & Development Consultants
D00517/2018	<a href="#">CVQ-3465</a>	Bovale Developments	BMA Planning & Development Consultants
D00518/2018	<a href="#">CVQ-3464</a>	Aldi Stores (Ireland) Limited	O'Connor Whelan Planning Consultants
D00519/2018	<a href="#">CVQ-3470</a>	Pobal Gaeilge Cúig Déag	
D00520/2018	<a href="#">CVQ-3471</a>	David McCarthy	MacCabe Durney Barnes
D00521/2018	<a href="#">CVQ-3473</a>	Mardown Ltd	Kieran O'Malley & Co. Ltd
D00522/2018	<a href="#">CVQ-3481</a>	Dalata Hotel Group Plc	Coakley O'Neill Town Planning Ltd.
D00523/2018	<a href="#">CVQ-3455</a>	Myles Caulfield	
D00524/2018	<a href="#">CVQ-3463</a>	Whitehall Colmcille GAA Club	IMG Planning
D00525/2018	<a href="#">CVQ-3478</a>	Harry Saul	Kieran O'Malley & Co. Ltd
D00526/2018	<a href="#">CVQ-3483</a>	Lidl Ireland GmbH	TBP Planning & Development Consultants
D00527/2018	<a href="#">CVQ-3488</a>	John Smith in conjunction with The Macken & O'Hara Families	Hughes Planning & Development Consultants
D00528/2018	<a href="#">CVQ-2564</a>	Ballymun Kickhams GAA Club	
D00529/2018	<a href="#">CVQ-3484</a>	Green REIT (WESTEND) Ltd	RPS Group
D00530/2018	<a href="#">CVQ-3498</a>	David McCarthy	MacCabe Durney Barnes
D00531/2018	<a href="#">CVQ-3500</a>	Flynn & O'Flaherty Construction	BMA Planning & Development Consultants

# APPENDIX C

Submission Reference	CVQ ID	Submitter	Company/Agent
D00532/2018	<a href="#">CVQ-3501</a>	Crescent Park Properties	Hughes Planning & Development Consultants
D00533/2018	<a href="#">CVQ-3431</a>	Paul Sheeran	Reid Associates
D00534/2018	<a href="#">CVQ-3466</a>	Vincentian Order, Castleknock College	Simon Clear & Associates
D00535/2018	<a href="#">CVQ-3491</a>	Colm McGinty	
D00536/2018	<a href="#">CVQ-3496</a>	Myles Caulfield	
D00537/2018	<a href="#">CVQ-3503</a>	Crekav Limited Partnership	New Generation Homes
D00538/2018	<a href="#">CVQ-3506</a>	Crescent Park Properties	Hughes Planning & Development Consultants
D00539/2018	<a href="#">CVQ-3426</a>	Myles Caulfield	
D00540/2018	<a href="#">CVQ-3492</a>	GIA Consultancy	
D00541/2018	<a href="#">CVQ-3516</a>	St Laurence O'Toole Diocesan Trust	Stephen Little & Associates
D00542/2018	<a href="#">CVQ-3517</a>	Crescent Park Properties	Hughes Planning & Development Consultants
D00543/2018	<a href="#">CVQ-3522</a>	Department of Education & Skills	
D00544/2018	<a href="#">CVQ-3513</a>	Ecocem	
D00545/2018	<a href="#">CVQ-3524</a>	Keelings	
D00546/2018	<a href="#">CVQ-3528</a>	Crescent Park Properties	Hughes Planning & Development Consultants
D00547/2018	<a href="#">CVQ-3529</a>	HSE	Bilfinger GVA
D00548/2018	<a href="#">CVQ-3533</a>	National Transport Authority	
D00549/2018	<a href="#">CVQ-3382</a>	Dublin Bus	
D00550/2018	<a href="#">CVQ-3525</a>	landowners Burke, Grimes, Fitzgerald and Shirran	Denis Burke
D00551/2018	<a href="#">CVQ-3535</a>	Irish Wind Energy Association	
D00553/2018	<a href="#">CVQ-3546</a>	Musgraves Operating Partners Ireland	BMA Planning & Development Consultants
D00554/2018	<a href="#">CVQ-3461</a>	Balrothery Community Association	
D00555/2018	<a href="#">CVQ-3542</a>	Killeen Properties Limited	RPS Group
D00556/2018	<a href="#">CVQ-3550</a>	Garrett Hartigan	HRA Planning
D00557/2018	<a href="#">CVQ-3552</a>	Malahide Golf Club	
D00558/2018	<a href="#">CVQ-3553</a>	Tesco Ireland Ltd.	GVA Planning & Regeneration Ltd..
D00559/2018	<a href="#">CVQ-2436</a>	Padraig Rooney	
D00560/2018	<a href="#">CVQ-3560</a>	Eoin Aherne	
D00561/2018	<a href="#">CVQ-3561</a>	KFC UK and Ireland	Bilfinger GVA
D00562/2018	<a href="#">CVQ-3015</a>	Claire Hannon	
D00563/2018	<a href="#">CVQ-3539</a>	Pauline & Paul Andrews	
D00564/2018	<a href="#">CVQ-3438</a>	Portmarnock Community Association	
D00565/2018	<a href="#">CVQ-3547</a>	Ellen Carey	
D00566/2018	<a href="#">CVQ-3572</a>	Sainfoin Property Company	ILTP Consulting
D00567/2018	<a href="#">CVQ-3573</a>	McGarrell Reilly Group	Conroy Crowe Kelly Architects & Urban Designers
D00568/2018	<a href="#">CVQ-3578</a>	Byrne Family	ILTP Consulting
D00569/2018	<a href="#">CVQ-3582</a>	Hansfield Investments Ltd	Conroy Crowe Kelly Architects & Urban Designers
D00570/2018	<a href="#">CVQ-3575</a>	Denis Burke	
D00571/2018	<a href="#">CVQ-3579</a>	McGarrell Reilly Group	Conroy Crowe Kelly Architects & Urban Designers
D00572/2018	<a href="#">CVQ-3585</a>	Frank Grant Garages Ltd..	ILTP Consulting
D00573/2018	<a href="#">CVQ-3589</a>	Rossmere Developments	Conroy Crowe Kelly Architects & Urban Designers
D00574/2018	<a href="#">CVQ-3593</a>	McGarrell Reilly Group	Conroy Crowe Kelly Architects & Urban Designers
D00575/2018	<a href="#">CVQ-3587</a>	Lambay View & Clifflands Court Residents Association	
D00576/2018	<a href="#">CVQ-3595</a>	Patrick Morrissey	
D00577/2018	<a href="#">CVQ-3598</a>	Cllr. David Healy	
D00578/2018	<a href="#">CVQ-3600</a>	daa (Dublin Airport)	
D00579/2018	<a href="#">CVQ-2700</a>	Codema	
D00580/2018	<a href="#">CVQ-3565</a>	Myles Caulfield	
D00581/2018	<a href="#">CVQ-3580</a>	Roy Harford	
D00582/2018	<a href="#">CVQ-3596</a>	New Generation Homes	

# APPENDIX C

Submission Reference	CVQ ID	Submitter	Company/Agent
D00583/2018	<a href="#">CVQ-3605</a>	Kirkpatrick Rockfield Coolmine Residents Association (KRCRA)	
D00584/2018	<a href="#">CVQ-3608</a>	Kevin Richard Tolan	
D00585/2018	<a href="#">CVQ-3617</a>	RGDATA	
D00586/2018	<a href="#">CVQ-3619</a>	Mc Peake Auctioneers	
D00587/2018	<a href="#">CVQ-3621</a>	Cllr. Brian Dennehy	
D00588/2018	<a href="#">CVQ-3623</a>	Morgan Doran	
D00589/2018	<a href="#">CVQ-3625</a>	James Foley	
D00590/2018	<a href="#">CVQ-3627</a>	Gary Mc Gee	
D00591/2018	<a href="#">CVQ-3629</a>	Darren Smith	
D00592/2018	<a href="#">CVQ-3631</a>	Paul Long	
D00593/2018	<a href="#">CVQ-3633</a>	Pat Murphy	
D00594/2018	<a href="#">CVQ-3635</a>	Kim Kavanagh	
D00595/2018	<a href="#">CVQ-3637</a>	Joe McPeake	
D00596/2018	<a href="#">CVQ-3639</a>	Joe McPeake	
D00597/2018	<a href="#">CVQ-3641</a>	Paul & Clair Rimmer	O'Neill Town Planning
D00598/2018	<a href="#">CVQ-3182</a>	Brian Farrell	William Murray & Associates
D00599/2018	<a href="#">CVQ-3644</a>	Helen O'Leary	Future Analytics Consulting Ltd.
D00600/2018	<a href="#">CVQ-3646</a>	Omega Air	Future Analytics Consulting Ltd.
D00601/2018	<a href="#">CVQ-3648</a>	Billy Mc Grane	M.H.M. Design
D00602/2018	<a href="#">CVQ-3650</a>	Robert Hughes	M.H.M. Design
D00603/2018	<a href="#">CVQ-3652</a>	John Healy	M.H.M. Design
D00604/2018	<a href="#">CVQ-3654</a>	Jennifer Fitzgerald	M.H.M. Design
D00605/2018	<a href="#">CVQ-3656</a>	Kevin Cluskey	O'Neill Town Planning
D00606/2018	<a href="#">CVQ-3658</a>	Kevin Cluskey	O'Neill Town Planning
D00607/2018	<a href="#">CVQ-3660</a>	Jarkin Properties/Grafton Group PLC	Tom Phillips & Associates
D00608/2018	<a href="#">CVQ-3662</a>	Swords Partnership, HSE, Kileen Investments- Capri Asset Management	Future Analytics Consulting Ltd.
D00609/2018	<a href="#">CVQ-3663</a>	Corner Group Ireland	Manahan Planners
D00610/2018	<a href="#">CVQ-3666</a>	The College of the Holy and Undivided Trinity of Queen Elizabeth, Trinity College Dublin	Future Analytics Consulting Ltd.
D00611/2018	<a href="#">CVQ-3668</a>	Keelings Fruit Growers	Douglas Hyde & Associates
D00612/2018	<a href="#">CVQ-3670</a>	Fiona and Kevin Flanigan	
D00613/2018	<a href="#">CVQ-3675</a>	Newline Homes Ltd	Douglas Hyde & Associates
D00614/2018	<a href="#">CVQ-3677</a>	Newline Homes Ltd	Douglas Hyde & Associates
D00615/2018	<a href="#">CVQ-3679</a>	Collins Family	EM Hogan & Associates
D00616/2018	<a href="#">CVQ-3681</a>	Clarke Family Trust	Manahan Planners
D00617/2018	<a href="#">CVQ-3683</a>	Jim O' Donohoe	
D00618/2018	<a href="#">CVQ-3685</a>	Skerries Athletics Club	
D00619/2018	<a href="#">CVQ-3687</a>	Geraldine Whelan John Dockrell	
D00620/2018	<a href="#">CVQ-3691</a>	Sherman Oaks Ltd	
D00621/2018	<a href="#">CVQ-3693</a>	Keep Ireland Open	
D00622/2018	<a href="#">CVQ-3695</a>	Colette Langan	
D00623/2018	<a href="#">CVQ-3697</a>	Con Smyth	
D00624/2018	<a href="#">CVQ-3698</a>	Colm Mohan	Downey Planning
D00625/2018	<a href="#">CVQ-3701</a>	Roganstown Hotel and Country Club	Downey Planning
D00626/2018	<a href="#">CVQ-3703</a>	Joseph Kelly	
D00627/2018	<a href="#">CVQ-3705</a>	Woodland Park Residents Association	
D00628/2018	<a href="#">CVQ-3707</a>	Roadstone	SLR Consulting
D00629/2018	<a href="#">CVQ-3709</a>	Denver Valley Developments Ltd	Downey Planning
D00630/2018	<a href="#">CVQ-3674</a>	Mick Byrne	CQA Design & Build
D00631/2018	<a href="#">CVQ-3713</a>	Pamela Rock	
D00632/2018	<a href="#">CVQ-3715</a>	Daniel Leonard	
D00633/2018	<a href="#">CVQ-3716</a>	Active Age for All	
D00634/2018	<a href="#">CVQ-3719</a>	Byrne Family	ILTP Limited
D00635/2018	<a href="#">CVQ-3720</a>	Mary Mc Evaddy	Downey Planning
D00636/2018	<a href="#">CVQ-3723</a>	Breda Dockrell	
D00637/2018	<a href="#">CVQ-3725</a>	Niall Kavanagh	
D00638/2018	<a href="#">CVQ-3726</a>	Gerry Tallan	Downey Planning
D00639/2018	<a href="#">CVQ-3729</a>	Greener Metal Recycling	
D00640/2018	<a href="#">CVQ-3730</a>	Sherborough Properties Ltd	Downey Planning
D00641/2018	<a href="#">CVQ-3734</a>	Fingal Farmers Group	Downey Planning
D00642/2018	<a href="#">CVQ-3736</a>	Philip Kavanagh	

# APPENDIX C

Submission Reference	CVQ ID	Submitter	Company/Agent
D00643/2018	<a href="#">CVQ-3739</a>	Department of the Environment, Community and Local Government	
D00644/2018	<a href="#">CVQ-3738</a>	MKN Property Group and Balmoral Land Swords	Downey Planning
D00645/2018	<a href="#">CVQ-3742</a>	Michael Hannon, Thomas Smith Patrick Sutton , Thomas Hickey	The Big Space
D00646/2018	<a href="#">CVQ-3743</a>	St. Doolagh's Park Care and Rehabilitation Centre	Downey Planning
D00647/2018	<a href="#">CVQ-3746</a>	Jimmy Rock	
D00648/2018	<a href="#">CVQ-3748</a>	Leonard McLoughlin	
D00649/2018	<a href="#">CVQ-3751</a>	Hollystown Golf and Leisure Ltd	The Big Space
D00650/2018	<a href="#">CVQ-3753</a>	Ali Martin	
D00651/2018	<a href="#">CVQ-3755</a>	J Lennon	
D00652/2018	<a href="#">CVQ-3757</a>	Rohan Holdings Ltd	Downey Planning
D00653/2018	<a href="#">CVQ-3759</a>	Rohan Holdings Ltd	Downey Planning
D00654/2018	<a href="#">CVQ-3760</a>	Timothy Fitzgerald	The Big Space
D00655/2018	<a href="#">CVQ-3763</a>	Michael Armstrong	
D00656/2018	<a href="#">CVQ-3765</a>	Packside Ltd	Downey Planning
D00657/2018	<a href="#">CVQ-3767</a>	Thomas Henry	
D00658/2018	<a href="#">CVQ-3769</a>	Packside Ltd	Downey Planning
D00659/2018	<a href="#">CVQ-3771</a>	David Campion	Downey Planning
D00660/2018	<a href="#">CVQ-3773</a>	Mark Foley	
D00661/2018	<a href="#">CVQ-3775</a>	Pat McGarry	
D00662/2018	<a href="#">CVQ-3776</a>	Thomas P. Broughan T.D.	
D00663/2018	<a href="#">CVQ-3779</a>	Mr Paul Mc Grattan and Mr. Terry Kelly	Downey Planning
D00664/2018	<a href="#">CVQ-3781</a>	Sam Dennigan and Co	Downey Planning
D00665/2018	<a href="#">CVQ-3783</a>	John and Madeline Mangan, John Byrne	Downey Planning
D00666/2018	<a href="#">CVQ-3785</a>	P and M Behan, P and A Flood W and M Boardman, R and C Seaver	Downey Planning
D00667/2018	<a href="#">CVQ-3787</a>	Murphy Environmental Hollywood Ltd	Fingal Planning Consultants
D00668/2018	<a href="#">CVQ-3789</a>	Gannon Properties	Downey Planning
D00669/2018	<a href="#">CVQ-3791</a>	Joe & Jackie O'Connor	Fingal Planning Consultants
D00670/2018	<a href="#">CVQ-3792</a>	Rohan Holdings Ltd	Downey Planning
D00671/2018	<a href="#">CVQ-3795</a>	Seamus Murphy	Fingal Planning Consultants
D00672/2018	<a href="#">CVQ-3797</a>	Marie Hogan	Downey Planning
D00673/2018	<a href="#">CVQ-3799</a>	Sherborough Properties Ltd	Downey Planning
D00674/2018	<a href="#">CVQ-3801</a>	Andona Holdings Ltd	Downey Planning
D00675/2018	<a href="#">CVQ-3803</a>	Margaret Heneghan	Ganly Walters
D00676/2018	<a href="#">CVQ-3805</a>	Abbey Commercial Parks Ltd	Downey Planning
D00677/2018	<a href="#">CVQ-3807</a>	Georgina Keeling	Downey Planning
D00678/2018	<a href="#">CVQ-3808</a>	Kinsealy Garden Centre	EM Hogan Architectural & Development Consultants
D00679/2018	<a href="#">CVQ-3811</a>	Charles Mc Allister	Downey Planning
D00680/2018	<a href="#">CVQ-3813</a>	David Mc Allister	Downey Planning
D00681/2018	<a href="#">CVQ-3814</a>	Cllr. Paul Mulville	
D00682/2018	<a href="#">CVQ-3817</a>	Gannon Properties	Downey Planning
D00683/2018	<a href="#">CVQ-3819</a>	Gannon Properties	Downey Planning
D00684/2018	<a href="#">CVQ-3821</a>	Brian Lynam	Downey Planning
D00685/2018	<a href="#">CVQ-3823</a>	McHale Partnership	Downey Planning
D00686/2018	<a href="#">CVQ-3825</a>	McHale Partnership	Downey Planning
D00687/2018	<a href="#">CVQ-3827</a>	Conor McGuinness	
D00688/2018	<a href="#">CVQ-3829</a>	Coleman Quinn Associates Build and Design	
D00689/2018	<a href="#">CVQ-3831</a>	Swords Tidy Towns	
D00691/2018	<a href="#">CVQ-3836</a>	Amanda & David Farren	
D00692/2018	<a href="#">CVQ-3839</a>	Department of Arts Heritage and the Gaeltacht	
D00693/2018	<a href="#">CVQ-3841</a>	Helena Dawson	EM Hogan Architectural & Development Consultants
D00694/2018	<a href="#">CVQ-2620</a>	Garda GAA and Westmanstown Gaels	
D00695/2018	<a href="#">CVQ-3345</a>	Thomas Condron	
D00696/2018	<a href="#">CVQ-3480</a>	Margie McLoone	
D00697/2018	<a href="#">CVQ-3843</a>	Donnelly Family	EM Hogan Architectural & Development Consultants
D00698/2018	<a href="#">CVQ-3845</a>	Terry O'Reilly	EM Hogan Architectural & Development Consultants
D00699/2018	<a href="#">CVQ-3847</a>	Pierce Dowling & John Foy	EM Hogan Architectural & Development Consultants
D00700/2018	<a href="#">CVQ-3849</a>	Olive Sarsfield	
D00701/2018	<a href="#">CVQ-3851</a>	Pat O'Leary	Brennan Furlong Architects & Urban Planners

# APPENDIX C

Submission Reference	CVQ ID	Submitter	Company/Agent
D00702/2018	<a href="#">CVQ-3853</a>	Deirdre Moore	JG Consulting
D00703/2018	<a href="#">CVQ-3857</a>	Drumargh Ltd	Downey Planning
D00704/2018	<a href="#">CVQ-3859</a>	Vivian Hand	Downey Planning
D00705/2018	<a href="#">CVQ-3861</a>	St. Margaret's Recycling and Transfer Centre Ltd	Downey Planning
D00706/2018	<a href="#">CVQ-3863</a>	The Buckleys and The Leonards	Downey Planning
D00707/2018	<a href="#">CVQ-3865</a>	Kevin Counihand and David Rogers	Downey Planning
D00708/2018	<a href="#">CVQ-3867</a>	Bank of Ireland	Declan Brassil & Company Ltd
D00709/2018	<a href="#">CVQ-3870</a>	John Hamilton	Michael Halligan Planning Consultants
D00710/2018	<a href="#">CVQ-3869</a>	Paula Foley	
D00711/2018	<a href="#">CVQ-3877</a>	Balazs Borocz	
D00712/2018	<a href="#">CVQ-3880</a>	Depton Ltd	Simon Clear & Associates
D00713/2018	<a href="#">CVQ-3882</a>	O'Connor Family	Simon Clear & Associates
D00714/2018	<a href="#">CVQ-3884</a>	Downey Planning	
D00715/2018	<a href="#">CVQ-3885</a>	Soundwaves Festival	
D00716/2018	<a href="#">CVQ-3888</a>	Sheila Cooney	Simon Clear & Associates
D00717/2018	<a href="#">CVQ-3890</a>	Sport Ireland	Cunnane Stratton Reynolds
D00718/2018	<a href="#">CVQ-3892</a>	Dave Terry	Terry & O'Flanagan
D00719/2018	<a href="#">CVQ-3893</a>	H2blake Ltd	Cunnane Stratton Reynolds
D00720/2018	<a href="#">CVQ-3896</a>	Lar McKenna	
D00721/2018	<a href="#">CVQ-3898</a>	Vivienne Browning	HRA Planning
D00722/2018	<a href="#">CVQ-3900</a>	Vivienne Browning	HRA Planning
D00723/2018	<a href="#">CVQ-3902</a>	Denis Mahony Ltd	William Murray and Associates
D00724/2018	<a href="#">CVQ-3904</a>	Brigid Doyle	
D00725/2018	<a href="#">CVQ-3906</a>	Toyoko Inn International Ltd	Simon Clear & Associates
D00726/2018	<a href="#">CVQ-3907</a>	Edward Byrne	JG Consulting
D00727/2018	<a href="#">CVQ-3911</a>	Biblico Holdings Ireland Ltd and Corson International	JG Consulting
D00728/2018	<a href="#">CVQ-3910</a>	Danhill Ltd	
D00729/2018	<a href="#">CVQ-3914</a>	SDR Site One Limited	McGill Planning
D00730/2018	<a href="#">CVQ-3917</a>	Michael Kennedy	O'Neill Town Planning
D00731/2018	<a href="#">CVQ-3916</a>	Remedy Care Ltd	McGill Planning
D00732/2018	<a href="#">CVQ-3920</a>	Porterstown Residents Association	
D00733/2018	<a href="#">CVQ-3922</a>	Beechtree Nursing Home	
D00734/2018	<a href="#">CVQ-3924</a>	Thomas P. Broughan T.D.	
D00735/2018	<a href="#">CVQ-3926</a>	Gembira Ltd	John Spain Associates
D00736/2018	<a href="#">CVQ-3928</a>	A Prokoptno	
D00737/2018	<a href="#">CVQ-3929</a>	Hollystown Golf and Leisure Ltd & Dublin G.A.A.	Cumann Lutchleas Gael
D00738/2018	<a href="#">CVQ-3932</a>	Bart O'Connor	Terry & O'Flanagan
D00739/2018	<a href="#">CVQ-3933</a>	Pitcher Family	EM Hogan Architectural & Development Consultants
D00740/2018	<a href="#">CVQ-3936</a>	Martin and Suzanne Kennedy	Clifton Scannell Emerson Associates
D00741/2018	<a href="#">CVQ-3937</a>	Joe O'Keeffe	EM Hogan Architectural & Development Consultants
D00742/2018	<a href="#">CVQ-3940</a>	Edmund McAuley	Cllr. Tony Murphy
D00743/2018	<a href="#">CVQ-3942</a>	Canon Kirk Ltd	Declan Brassil & Company Ltd
D00744/2018	<a href="#">CVQ-3944</a>	Canon Kirk Ltd	Declan Brassil & Company Ltd
D00745/2018	<a href="#">CVQ-3945</a>	Donal Butterly	EM Hogan Architectural & Development Consultants
D00746/2018	<a href="#">CVQ-3948</a>	Castleknock Residents Association	
D00747/2018	<a href="#">CVQ-3950</a>	John Fynes	
D00748/2018	<a href="#">CVQ-3952</a>	Jim Brogan	
D00749/2018	<a href="#">CVQ-3954</a>	Martin Tully Jr.	
D00750/2018	<a href="#">CVQ-3956</a>	Patricia Dowling	Fingal Planning Consultants
D00751/2018	<a href="#">CVQ-3958</a>	Aisling Menton	
D00752/2018	<a href="#">CVQ-3960</a>	David Doran	
D00753/2018	<a href="#">CVQ-3962</a>	Dublin City Council	
D00754/2018	<a href="#">CVQ-3964</a>	Swords Tidy Towns	
D00755/2018	<a href="#">CVQ-3966</a>	Hines Real Estate Ireland Ltd	The Big Space
D00756/2018	<a href="#">CVQ-3968</a>	Martin Brennan	

# APPENDIX C

Submission Reference	CVQ ID	Submitter	Company/Agent
D00757/2018	<a href="#">CVQ-3970</a>	Louis Monks	
D00758/2018	<a href="#">CVQ-3972</a>	Antoinette Lowndes	
D00759/2018	<a href="#">CVQ-3974</a>	J. Smyth	
D00760/2018	<a href="#">CVQ-3976</a>	John Murtagh	
D00761/2018	<a href="#">CVQ-3980</a>	Mairead Monks	
D00762/2018	<a href="#">CVQ-3982</a>	Maria Hand	
D00763/2018	<a href="#">CVQ-3985</a>	Brigid Butterly	
D00764/2018	<a href="#">CVQ-3987</a>	Michelle & Ian Burke	
D00765/2018	<a href="#">CVQ-2240</a>	Garry Owens	
D00766/2018	<a href="#">CVQ-3299</a>	Joe McPeake	
D00767/2018	<a href="#">CVQ-3989</a>	Michael O'Rourke	
D00768/2018	<a href="#">CVQ-3284</a>	St. Margaret's Concerned Residents Group	
D00769/2018	<a href="#">CVQ-3991</a>	Gerard & Margaret Barnwall	
D00770/2018	<a href="#">CVQ-3993</a>	Warren Family	
D00771/2018	<a href="#">CVQ-3995</a>	Monks Family	
D00772/2018	<a href="#">CVQ-3997</a>	Eva Burke Family	
D00773/2018	<a href="#">CVQ-3999</a>	Dunne Family	
D00774/2018	<a href="#">CVQ-4001</a>	Brady Family	
D00775/2018	<a href="#">CVQ-4003</a>	Thomas Carroll	
D00776/2018	<a href="#">CVQ-4005</a>	Deegan Family	
D00777/2018	<a href="#">CVQ-4007</a>	David Milne	
D00778/2018	<a href="#">CVQ-4009</a>	Philip Mc Garrell	
D00779/2018	<a href="#">CVQ-4011</a>	John Monks	
D00780/2018	<a href="#">CVQ-4013</a>	Joseph Monks	
D00781/2018	<a href="#">CVQ-4015</a>	Pearse Hand	
D00782/2018	<a href="#">CVQ-4017</a>	Jimmy Byrne	
D00783/2018	<a href="#">CVQ-4019</a>	Christopher Hutton	
D00784/2018	<a href="#">CVQ-4021</a>	Michael Heffernan	
D00785/2018	<a href="#">CVQ-4023</a>	Pat Brennan	
D00786/2018	<a href="#">CVQ-4025</a>	Kelly Family	
D00787/2018	<a href="#">CVQ-4027</a>	Squires Family	
D00788/2018	<a href="#">CVQ-4029</a>	Cooney Family	
D00789/2018	<a href="#">CVQ-4031</a>	Newman Family	
D00790/2018	<a href="#">CVQ-4033</a>	Traynor Family	
D00791/2018	<a href="#">CVQ-4035</a>	Natalie Tynan	
D00792/2018	<a href="#">CVQ-4037</a>	Daniel Doyle	
D00793/2018	<a href="#">CVQ-4039</a>	Hannon Transport Ltd.	Downey Planning
D00794/2018	<a href="#">CVQ-4040</a>	Martin Reilly	
D00795/2018	<a href="#">CVQ-4042</a>	Louise O'Rourke	
D00796/2018	<a href="#">CVQ-4045</a>	Sullivan Family	
D00797/2018	<a href="#">CVQ-4047</a>	Donoghue Family	
D00798/2018	<a href="#">CVQ-4049</a>	Lisa O'Donnell	
D00799/2018	<a href="#">CVQ-4052</a>	Derek Mitchell	
D00800/2018	<a href="#">CVQ-4055</a>	Barry Family	
D00801/2018	<a href="#">CVQ-4057</a>	Rooney Family	
D00802/2018	<a href="#">CVQ-4062</a>	John Mangan	Strategy Partners
D00803/2018	<a href="#">CVQ-4064</a>	Taylor Family	Strategy Partners
D00804/2018	<a href="#">CVQ-4066</a>	Thomas & Mae Ring	
D00805/2018	<a href="#">CVQ-4068</a>	Catherine Donoghue & Family	
D00806/2018	<a href="#">CVQ-4069</a>	Gerald Horan	
D00807/2018	<a href="#">CVQ-4072</a>	Cumann Luthcleas Gael Coiste Átha Cliath, Dublin GAA County Board	Jim Brogan, Planning & Development Consultant
D00808/2018	<a href="#">CVQ-4074</a>	Laraghcon Estate Ltd	Jim Brogan, Planning & Development Consultant
D00809/2018	<a href="#">CVQ-4078</a>	Tackaberry Family	
D00810/2018	<a href="#">CVQ-4080</a>	Anne Marie Ennis	
D00811/2018	<a href="#">CVQ-4082</a>	Sandra Tynan & Family	
D00812/2018	<a href="#">CVQ-4084</a>	Stephen Green	
D00813/2018	<a href="#">CVQ-4086</a>	Lorraine Kennedy	
D00814/2018	<a href="#">CVQ-4076</a>	Marymount Day Care Centre	Jim Brogan, Planning & Development Consultant
D00815/2018	<a href="#">CVQ-4088</a>	Kian Burke & Family	
D00816/2018	<a href="#">CVQ-4090</a>	Tony McKenna	
D00817/2018	<a href="#">CVQ-4093</a>	Jean Carroll	
D00818/2018	<a href="#">CVQ-4095</a>	Theresa & Bert McGregor	
D00819/2018	<a href="#">CVQ-4097</a>	Audrey Baldock	
D00820/2018	<a href="#">CVQ-4099</a>	Antoinette Cogly	
D00821/2018	<a href="#">CVQ-4101</a>	Tom Collins	

# APPENDIX C

Submission Reference	CVQ ID	Submitter	Company/Agent
D00822/2018	<a href="#">CVQ-4103</a>	Mark Mc Cann	
D00823/2018	<a href="#">CVQ-4105</a>	Colm Mc Cann	
D00824/2018	<a href="#">CVQ-4107</a>	Maria Murtagh	
D00825/2018	<a href="#">CVQ-4109</a>	Treacy Family	
D00826/2018	<a href="#">CVQ-4111</a>	Lynch Family	
D00827/2018	<a href="#">CVQ-4112</a>	Hilda Mc Cann	
D00828/2018	<a href="#">CVQ-4115</a>	Sean Mc Cann	
D00829/2018	<a href="#">CVQ-4117</a>	Enda Carroll	
D00830/2018	<a href="#">CVQ-4119</a>	Alan Mc Cann	
D00831/2018	<a href="#">CVQ-4121</a>	C O'Grady	
D00832/2018	<a href="#">CVQ-4125</a>	Nina & Aaron Nugent	
D00833/2018	<a href="#">CVQ-4127</a>	Ernie Courtney	
D00834/2018	<a href="#">CVQ-4129</a>	Rory Mc Cann	
D00835/2018	<a href="#">CVQ-4131</a>	Madeline Lucy	
D00836/2018	<a href="#">CVQ-4133</a>	Bronan Mc Cann	
D00837/2018	<a href="#">CVQ-4135</a>	Jackson Family	
D00838/2018	<a href="#">CVQ-4137</a>	Rob McGeary	
D00839/2018	<a href="#">CVQ-4139</a>	Noel & Mary Barry	
D00840/2018	<a href="#">CVQ-4140</a>	John Mc Cann	
D00841/2018	<a href="#">CVQ-4143</a>	Joseph & Anne Deegan	
D00842/2018	<a href="#">CVQ-4145</a>	Brendan Mooney	
D00843/2018	<a href="#">CVQ-4147</a>	Mathew & Marie Cowley	
D00844/2018	<a href="#">CVQ-4149</a>	Pearse Mooney	
D00845/2018	<a href="#">CVQ-4151</a>	Kennedy Family	
D00846/2018	<a href="#">CVQ-4153</a>	Eileen Gatlea, Nathan & Michelle O Sullivan	
D00847/2018	<a href="#">CVQ-4155</a>	Yvonne Mc Goldrick	
D00848/2018	<a href="#">CVQ-4157</a>	Sean Mooney	
D00849/2018	<a href="#">CVQ-4159</a>	Niall Mc Goldrick	
D00850/2018	<a href="#">CVQ-4161</a>	Seamus Mc Goldrick	
D00851/2018	<a href="#">CVQ-4163</a>	Jamie Nugent	
D00852/2018	<a href="#">CVQ-4165</a>	Fideles Meany	
D00853/2018	<a href="#">CVQ-4167</a>	Aoibhinn Mooney	
D00854/2018	<a href="#">CVQ-4169</a>	Jenny Mc Goldrick	
D00855/2018	<a href="#">CVQ-4171</a>	Eddie Mc Goldrick	
D00856/2018	<a href="#">CVQ-4173</a>	Juri Berezinskij	
D00857/2018	<a href="#">CVQ-4175</a>	Paul Byrne	
D00858/2018	<a href="#">CVQ-4177</a>	Joe Leonard	
D00859/2018	<a href="#">CVQ-4179</a>	Richard Morrin	
D00860/2018	<a href="#">CVQ-4183</a>	Lisa Callan	
D00861/2018	<a href="#">CVQ-4185</a>	Rebecca & K O'Brien	
D00862/2018	<a href="#">CVQ-4187</a>	McGovern Family	
D00863/2018	<a href="#">CVQ-4189</a>	Liam & Katherine Kane	
D00864/2018	<a href="#">CVQ-4191</a>	Michael & Margaret O' Rourke	
D00865/2018	<a href="#">CVQ-4193</a>	Malone Family	
D00866/2018	<a href="#">CVQ-4195</a>	Paul Kenny	
D00867/2018	<a href="#">CVQ-4197</a>	Patrick Mulligan	
D00868/2018	<a href="#">CVQ-4199</a>	Mark Greene	
D00869/2018	<a href="#">CVQ-4201</a>	John Christie	
D00870/2018	<a href="#">CVQ-4203</a>	Dom Farrell	
D00871/2018	<a href="#">CVQ-4205</a>	Richard Dunne	
D00872/2018	<a href="#">CVQ-4207</a>	Philomena Greene	
D00873/2018	<a href="#">CVQ-4209</a>	Philip Kelly	
D00874/2018	<a href="#">CVQ-4211</a>	James & Miriam Malone	
D00875/2018	<a href="#">CVQ-4212</a>	Niamh Butterly	
D00876/2018	<a href="#">CVQ-4215</a>	Deirdre Halpin	
D00877/2018	<a href="#">CVQ-4218</a>	Elizabeth Mc Donnell	
D00878/2018	<a href="#">CVQ-4220</a>	Edward Mc Guire	
D00879/2018	<a href="#">CVQ-4222</a>	Michael O' Brien	
D00880/2018	<a href="#">CVQ-4224</a>	John Dillon	
D00881/2018	<a href="#">CVQ-4226</a>	Deirdre Butterly	
D00882/2018	<a href="#">CVQ-4228</a>	Sophie L. Gilsean	
D00883/2018	<a href="#">CVQ-4230</a>	Debbie Cooley	
D00884/2018	<a href="#">CVQ-4232</a>	Michael & Breda Gaines	
D00885/2018	<a href="#">CVQ-4234</a>	Dufficy Family	
D00886/2018	<a href="#">CVQ-4236</a>	Deborah Walsh	
D00887/2018	<a href="#">CVQ-4238</a>	Louise & Joseph Lynch	
D00888/2018	<a href="#">CVQ-4240</a>	Tony Harford	
D00889/2018	<a href="#">CVQ-4242</a>	Sharon Connolly	

# APPENDIX C

Submission Reference	CVQ ID	Submitter	Company/Agent
D00890/2018	<a href="#">CVQ-4244</a>	Joe Egan & Family	
D00891/2018	<a href="#">CVQ-4245</a>	Maureen Dillon	
D00892/2018	<a href="#">CVQ-4248</a>	Paul Fynes	
D00893/2018	<a href="#">CVQ-4250</a>	Cathal Smyth	
D00894/2018	<a href="#">CVQ-4252</a>	Thomas Dillon	
D00895/2018	<a href="#">CVQ-4253</a>	Thomas Doherty	
D00896/2018	<a href="#">CVQ-4256</a>	Billy Halpin	
D00897/2018	<a href="#">CVQ-4258</a>	Lucy & Paul Lumley	
D00898/2018	<a href="#">CVQ-4259</a>	Brenda Barber	
D00899/2018	<a href="#">CVQ-4262</a>	Rory Butterly	
D00900/2018	<a href="#">CVQ-4264</a>	Keogh Family	
D00901/2018	<a href="#">CVQ-4265</a>	Cyril Mc Gee	
D00902/2018	<a href="#">CVQ-4268</a>	Harry Delaney	
D00903/2018	<a href="#">CVQ-4270</a>	John Wall	
D00904/2018	<a href="#">CVQ-4272</a>	Brenda Smyth	
D00905/2018	<a href="#">CVQ-4274</a>	Ciaran Smyth	
D00906/2018	<a href="#">CVQ-4276</a>	Helen Halpin	
D00907/2018	<a href="#">CVQ-4278</a>	Cllr. Ken Farrell	
D00908/2018	<a href="#">CVQ-4280</a>	Johnathan & Martin McKean	
D00909/2018	<a href="#">CVQ-4282</a>	C. Scott	
D00910/2018	<a href="#">CVQ-4284</a>	Farrelly Family	
D00911/2018	<a href="#">CVQ-4286</a>	Barbara Maher	
D00912/2018	<a href="#">CVQ-4288</a>	Bernard McNally	
D00913/2018	<a href="#">CVQ-4290</a>	Anthony Murray	
D00914/2018	<a href="#">CVQ-4292</a>	Emma & Orla Regan	
D00915/2018	<a href="#">CVQ-4294</a>	N. Callan	
D00916/2018	<a href="#">CVQ-4296</a>	Mrs. Tynan	
D00917/2018	<a href="#">CVQ-4298</a>	Mary Davis	
D00918/2018	<a href="#">CVQ-4300</a>	Richard Early	
D00919/2018	<a href="#">CVQ-4302</a>	J. O'Connor	
D00920/2018	<a href="#">CVQ-4304</a>	Walsh Family	
D00921/2018	<a href="#">CVQ-4307</a>	Walker Family	
D00922/2018	<a href="#">CVQ-4309</a>	B Bond	
D00923/2018	<a href="#">CVQ-4312</a>	Michael Connolly	CQA Design & Build
D00924/2018	<a href="#">CVQ-4314</a>	Turvey Manor Ltd	Simon Clear & Associates
D00925/2018	<a href="#">CVQ-2164</a>	Enda Sheppard	
D00928/2018	<a href="#">CVQ-4564</a>	Trinity Real Estates Ltd.	Downey Planning
D00929/2018	<a href="#">CVQ-4566</a>	Blackwood	Downey Planning
D00930/2018	<a href="#">CVQ-4568</a>	WBD Farm Machinery Ltd.	Downey Planning
D00926/2018	<a href="#">CVQ-4560</a>	Chanel Homes Ltd.	Downey Planning
D00927/2018	<a href="#">CVQ-4562</a>	Michael Murphy, Tom Winters and The Coolquoy Lodge	Downey Planning
D00931/2018	<a href="#">CVQ-4570</a>	Ian McGuinness, PHD Construction and Others	Downey Planning
D00932/2018	<a href="#">CVQ-4577</a>	Carol Williams	
D00933/2018	<a href="#">CVQ-4579</a>	Balbriggan Tidy Towns Association	



# APPENDIX D



## LIST OF PRESCRIBED BODIES



## Prescribed Bodies

The prescribed authorities for the purposes of sections 11, 12 and 13 of the Act shall be —

- (a) The Minister,
- (b) The Board,
- (c) The Minister for Agriculture, Fisheries and Food,
- (d) The Minister for Arts, Heritage and the Gaeltacht,
- (e) the Minister for Communications, Energy and Natural Resources,
- (f) The Minister for Defence,
- (g) the Minister for Education and Skills,
- (h) The Minister for Transport, Tourism and Sport,
- (i) An Chomhairle Ealaíon,
- (j) The Commissioners,
- (k) Dublin Airport Authority,
- (l) in the case of a planning authority any part of whose functional area is affected by the DTI Strategy, the Dublin Transportation Office (or any body that replaces that office)
- (la) EirGrid,
- (lb) the Environmental Protection Agency,
- (m) ESB (Electric Ireland),
- (n) Forfás,
- (o) Fáilte Ireland,
- (p) The Health Service Executive,
- (q) The Heritage Council,
- (r) The Health and Safety Authority,
- (s) Inland Fisheries Ireland,
- (t) The National Roads Authority,
- (u) In the case of a planning authority any part of whose functional area is situated within the functional area of the Shannon Free Airport Development Company Ltd., that Company,
- (v) An Taisce — the National Trust for Ireland,
- (w) Any planning authority whose area is contiguous to the area of the planning authority that prepared the draft,
- (x) Any local authority, including town councils, and any city and county development board in the area to which the draft relates, and
- (y) The regional authority or regional assembly within whose region the functional area of the planning authority is situated, and any regional authority whose region is contiguous to the region of the first-mentioned authority,
- (z) Irish Water.

**Source:** Article 13 of the Planning and Development Regulations 2001 – 2015 (Unofficial Consolidation)



Fingal County Council,  
County Hall,  
Main Street,  
Swords,  
Co. Dublin.  
K67 X8Y2  
T. 01 890 5000  
[www.fingal.ie/dpdev](http://www.fingal.ie/dpdev)

**Comhairle Contae  
Fhine Gall**  
Fingal County  
Council

