

**Uimhir Thagarta Uathúil:** FIN-C532-27

**Údar:** Ronan Dunphy

**Stádas:** Submitted

**Aighneacht:**

Proposed Material Alterations to the Draft Fingal Development Plan 2023-2029; ref. PA SH 5.3 (Skerries)

**Comhairliúchán:**

Proposed Material Alterations to the Draft Fingal Development Plan 2023-2029

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## MAP SHEET 5: Skerries

**Caibidil:** PART 3: Proposed Amendments to the Draft Developm... » MAP SHEET 5:  
Skerries

**Select, where provided, the reference for the amendment on which you wish to comment , or for flood maps, the drawing ref number:**

PA SH  
5.3

I am writing with regard to the proposed alteration to the Draft Fingal Development Plan 2023-2029 with reference PA SH 5.3 and to strongly object to the proposed rezoning of these lands from HA-High Amenity to RS-Residential. The residential zoning of such coastal land, which has been identified as at risk of erosion, is evidently not consistent with appropriate planning, particularly when there is already significant excess capacity of residentially-zoned land within Fingal County Council's administrative area.

The Draft Fingal Development Plan 2023 - 2029 rightly focuses on the climate emergency and incorporates "*Climate Action*" as a core overarching theme. Coastal erosion is already having a devastating impact on homes in Portrane. As outlined in the plan itself, appropriate land-use planning plays an important role in "*restricting development in areas that are at risk of flooding or coastal erosion*" and an Objective of the plan (DMSO164 & GINHO72) is to "*prohibit new development outside urban areas within the areas indicated on Green Infrastructure Maps, which are within 100m of coastline at risk from coastal erosion...*". Given that the area identified by ref. PA SH 5.3 is within 20m of coastline that has been identified as at risk from coastal erosion (as identified on Green Infrastructure Map 2, Sheet No. 15), such rezoning would clearly be contrary to proper planning and sustainable development and contrary to the stated objectives of the plan.

Furthermore, Fingal County Council has significant excess capacity within its administrative area to accommodate all required residential units over the plan period without changing the zoning of sensitive coastal lands. Fingal County Council has carried out an urban capacity assessment to calculate the yield of undeveloped land, specifically for the 31 designated settlements identified in the "*Fingal Settlement Hierarchy*" in the current Fingal Development Plan 2017-2023. Of the c.4,900 ha of land zoned for residential or mixed (including residential) use, it has been estimated that there are approximately 1,250 ha available to develop during this development plan cycle which can provide c.41,500 residential units (including the long-term strategic reserves at Lissenhall and Dunsink). This analysis clearly demonstrates that Fingal County Council has significant excess capacity to accommodate the required need of 16,245 residential units over the plan period. Significantly, the Office of the Planning Regulator agreed with this assessment in its submission on the draft plan.

I trust that the above will be taken into appropriate consideration.

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**Documents Attached:** Níl