

To whom it may concern;

Please see below my submission to the first stage of the Fingal Development Plan consultation.

Best wishes,

Karen

1. People & Place

The new Development Plan must prioritise well-designed, environmentally sustainable communities that are linked with accessible public transport infrastructure. New developments should ensure that natural and built infrastructure is put in place side by side with new housing to allow for healthy and sustainable communities.

Climate action needs to be placed at the forefront of future planning processes, in line with the Regional Spatial & Economic Strategy 2019-2031. Developments should focus on integrated transport and active travel links to reduce the dependency on cars that isolated and disconnected development creates. Planning guidelines should prioritise housing that is energy efficient, uses sustainable materials, and integrates renewable energy in the form of rooftop solar.

Development should focus on integrated development in existing urban areas, with a focus on ensuring that local services and amenities are commensurate with the growth of our towns. Emphasis should be placed on provision of adequate childcare and school places to cope with our growing population. Growing communities should be provided with sufficient outdoor recreation and parks to enhance our appreciation and enjoyment of nature.

Housing development in rural areas should be limited to where there is a clearly identified need on the part of the existing rural population and should seek to preserve at all times areas of natural beauty and our biodiversity.

Accessibility should be at the forefront of all developments, and this can be enhanced by a focus on pedestrian access and active travel solutions, which will contribute to our climate action ambitions.

COVID-19 has changed the way we view our homes and our communities. Our response to the pandemic has necessitated working from home to keep ourselves and others safe. We should learn from this experience and facilitate remote and hub working facilities to allow more people to work close to where they live. There are obvious quality of life benefits to this approach in affording us more time with our loved ones by cutting down on commuting times. Remote working can also lead to emissions reductions and revitalise local communities and economies which have been hollowed out as part of the commuter belt.

Cost-rental & Affordable Housing

The strategic direction of the forthcoming Development Plan must focus on land use policies that will deliver social and affordable housing at scale. A cost-rental model for social housing in the county should be explored to make maximum use of the available land banks and to ensure that valuable public housing assets remain in public ownership. Particular focus needs to be placed on providing affordable and social housing for young people who are struggling to find a home.

Where Council land is being transferred to developers via disposal, the Council should seek in return part of the resulting development as cost-rental housing to either an Approved Housing Body, or pending future legislative provisions, the Council itself. Disposals of Council land should, as a condition, preclude future sale of any part of the resultant development to Real Estate Investment Trusts, to ensure that Council land is not developed in such a way as to push young people out of the housing market.

Supported Housing

The Strategic Issues Paper states that there is a need to consider how approved housing bodies and other sectoral agencies can be supported in the provision of a greater diversity of housing type and tenure including social and affordable housing and examine models of low-cost rental and affordable home ownership.

- The Development Plan should include a provision for additional Supported Housing in Fingal. There is a particular community demand for supported housing for older people in Skerries which should be met within the lifetime of this development plan.
- Fingal benefits from a young vibrant and ever-increasing population. It is the fastest growing county in Ireland. It follows therefore, that Fingal will have many diverse housing needs and Supported Housing in a more general sense must be considered when looking at the bigger strategy for the future provision of housing to support the diverse needs of the population of Fingal.

Town Centres First

The new Development Plan should integrate the proposed national Town Centre First policy called for in the *Programme for Government: Our Shared Future* to revitalise Fingal's urban centres. The Town and Village Renewal Scheme should be leveraged to bring vacant and derelict sites in our town centres back into commercial and residential usage. The Council should consider appointing Town Centre Officers and/or Management Teams to assist property owners and to drive implementation of plans for each town. As part of the renewal of our town centres we should seek to increase and protect our urban trees and look for opportunities to increase overall biodiversity in our urban areas.

Lusk 2030 Project

Lusk is an historic town that has faced considerable pressures due to its rapid growth. The Lusk Vision 2030 Project is a very welcome innovation seeking to develop a community-led vision for Lusk through the collaborative creation of a town Action Plan.

- The strategies and design principles of the 'Lusk Vision 2030: Lusk for Life' project should be integrated into the Development Plan.

- The findings from public consultation conducted as part of the Lusk Vision 2030 project should be integrated into the Development Plan.
- The processes used for community-led town action plans with the Lusk 2030 project should be considered for other areas in Fingal that might benefit from a similar community-led approach.

Childcare

The population of Fingal is the youngest of any local authority in the state, and the demography of the area requires significant provision of childcare spaces. All developments in Fingal should make careful consideration of childcare needs associated with them and in the surrounding area and should prioritise new childcare facilities as conditions for planning.

2. Climate Action

Climate change and our response to it is probably our greatest strategic challenge for the next several decades, and will demand action at every level; international, national, and local. The Fingal Development Plan should take its lead from increased ambition at national level to pursue extensive climate mitigation and adaptation measures which will allow our county to take full advantage of the new green economy that climate action will bring.

All elements of the Development Plan need to have a climate action element. Housing needs to be built in a sustainable manner close to urban centres to prevent people from being locked into car ownership. Development should at all times be accompanied by robust public transport and active travel links to reduce emissions. Green infrastructure should be promoted to increase biodiversity and connect communities to nature.

Development standards under the new Development Plan should mandate that houses be built to the highest environmental standards. New builds should integrate rooftop solar and environmentally friendly heating systems (heat pumps) and should provide for EV charging stations on site.

Emissions:

- The Fingal Development Plan 2019-2024 called for a 40% reduction in Council GHG emissions by 2030. In line with increased national ambition on climate action in the Climate Action and Low Carbon Development (Amendment) Bill, Fingal County Council should aim to increase this to at least a 50% reduction by 2030.

Coastal Erosion and Flooding:

- Communities in Fingal are particularly susceptible to coastal erosion and flooding. Fingal County Council should aim to put in place a robust mitigation policy to combat the effects of coastal erosion and flooding. A detailed plan to combat coastal erosion and flooding should be put in place guided by best practice internationally, and appropriate funding provided to put it into action.

- Specific targeted supports and a detailed plan need to be put in Portrane and Rush in particular with a focus on saving as many homes as possible from the effects of erosion.
- Additional public consultation and engagement with a particular focus on effected residents should be facilitated by an enhanced Coastal Liaison Group.
- Fingal should take the lead nationally in terms of developing a Managed Retreat policy. Some homes in Fingal will not be possible to save. Yet there is no mechanism whereby people can leave homes (that become virtually uninsurable) that through no fault of their own have no future and move to a safer location. It would seem that currently a person's home needs to be uninhabitable before Fingal County Council homeless services will be able to deal with them.

Waste Reduction

- Additional recycling centres for Fingal should be considered to supplement the Estuary and Coolmine recycling centres. A recycling centre which is accessible to the towns in North Fingal should be considered to fill the gap left by the closure of the Balbriggan recycling centre in recent years.
- Bottle filling stations and public fountains should be rolled out at scale to reduce plastic bottle waste, following on from the successful rollout of 9 contactless Ecofil stations in 2020.

3. Connectivity & Movement

In line with our climate action commitments, the next Development Plan should facilitate a major expansion in the number of journeys taken by public transport and active travel, giving people options to avoid being locked into car ownership unnecessarily. Major public transport infrastructure such as Metrolink, DART+ and BusConnects should be knitted into the counties active travel network to allow for continuous journeys without the use of a car. In addition to expanding public transport and active travel, the Development Plan should aim to reduce the remaining emissions from private cars by facilitating EV ownership through the provision of a comprehensive EV charging network.

Cycling & Walking Infrastructure

Provision of well designed, safe cycling and walking infrastructure should be a major priority of the new Development Plan.

- Cycling infrastructure should be segregated from other motor vehicles wherever possible, and junction speeds reduced to reduce risks to pedestrians and cyclists.
- Cycle lanes and Greenways should be interlinked whenever possible to facilitate connectivity and allow for easy onward journeys by bicycle to all parts of the county.
- A particular emphasis should be placed on safe cycle routes to and from schools in Fingal to give all students the option to safely bike or scoot to school.
- Cycling and walking infrastructure should interlink as much as possible with existing public transport infrastructure and should also be developed to integrate with new projects such as BusConnects and Metrolink. Plentiful bike parking should be provided at major public transport hubs to incentivise cycle and ride journeys.

- A bike share scheme should be considered for all of Fingal's larger urban areas.
- While the coastal greenway plans are progressing, provision needs to be made to facilitate a Greenway between two of the largest towns in the county – Malahide and Swords.
- As the largest town in the county particular focus needs to be given to developing safe cycling routes within Swords town, especially in the context of the development of Metrolink stations.

BusConnects

- BusConnects should, wherever possible, retain mature trees along relevant routes.
- The Development Plan should prioritise ease of pedestrian access to all bus routes.

Metrolink

Metrolink has the potential to transform public transport between Swords, Dublin Airport, and the City Centre. It should be progressed as quickly as possible, while bearing in mind the needs of the communities that are most proximate to the route. In particular:

- Access to all stations by cycling and walking should be a priority - well designed cycling links to stations will facilitate complete journeys by active travel and public transport.
- Stations should have plentiful bicycle parking / bike bunkers as part of their planning.

DART+

- Accessibility for all stations should be prioritised to ensure that people with mobility issues can make complete journeys using public transport. Station lifts should be kept in working order and access to and from stations planned so as to be accessible for all users.

4. Economy, Employment and Dublin Airport

Green Economy

The new Development Plan should seek to take advantage of the huge opportunities a new green economy can bring to the county. The Council should facilitate new green jobs by retrofitting of existing social housing stock to make it warmer, healthier and more energy efficient. New renewable energy projects, in particular in offshore wind, have the potential to provide considerable employment opportunities. The Council should engage with community benefit funds arising from the Dublin Array and North Irish Sea Array projects to deliver community gains through these new renewables projects.

Organic Horticulture

Fingal benefits from a very developed horticulture sector. The Development Plan should seek to encourage horticulture, and in particular organic horticulture in Fingal's rural areas. Sponsorship of farmers markets in towns by the Council could be explored to provide

farmers with a direct market for their produce and would facilitate shorter supply chains and a lower carbon footprint for our food.

Tourism

New greenway projects have the potential to boost Fingal's tourism economy. Partnership with tourism businesses in the development of our coastal greenways should be looked at to help boost local businesses. We should take greater advantage of the untapped potential of coastal amenities and consider the development of a coastal blueway which can take advantage of Fingal's sailing, kayaking and other marine activities to draw visitors.

Dublin Airport

Our response to Climate Change may alter the frequency with which we as individuals travel by air, but aviation will remain a necessity for maintaining connectivity to our open island economy. The aviation sector has been devastated by the effects of the COVID-19 pandemic and will need sustained support to ensure it can recover.

- The Development plan should aim to facilitate aviation recovery by ensuring the airport is effectively interlinked with Fingal and the Greater Dublin area.
- Measures to protect the health of local communities from the negative impact of current and future planned aircraft noise are inadequate and need to be significantly augmented.
- Aircraft noise needs to be carefully and transparently monitored to mitigate the effects of noise pollution on surrounding communities. Robust and transparent noise monitoring must take place and adaptation grants for particularly effected areas facilitated.

5. Cultural Heritage

Fingal's cultural, architectural and historic heritage is of huge value and needs to be carefully safeguarded for future generations. The new Development Plan must consider the challenge climate change will present for our architectural heritage, particularly in coastal areas. Climate adaptation presents an opportunity as well as a challenge, as increased cycling and walking routes can bring us into closer proximity to our built cultural heritage.

- The new Development Plan should take into consideration the measures that will be necessary to protect our Protected Structures and Archaeological Conservation Areas from the effects of Climate Change.
- The successful Community Archaeology programme should be continued and expanded.
- Our new communities bring a wonderful diversity to our shared cultural heritage. Cultural programmes should seek to celebrate all of our diversity and traditions.
- Cultural programmes should be community centred and led as much as possible.

6. Green Infrastructure & Natural Heritage

Fingal benefits from some wonderful natural heritage both in its great coastal areas and also its rural interior. The new Development Plan should prioritise the safeguarding of natural heritage to the greatest possible extent, with a particular focus on maintaining and increasing biodiversity. All land use and planning should aim to protect the natural landscape and in particular to retain and protect Fingal's trees, with particular reference to its Tree Strategy. The Council should prioritise green infrastructure such as parks and greenways to enhance our connection to and appreciation of nature.

Biodiversity

The new development plan should prioritise the protection of Fingal's rich biodiversity. Development in the vicinity of the existing Special Areas of Conservation (SAC) should be carefully managed to prevent disruption to the designated species that may use the areas near the SAC for feeding and roosting.

Protection of biodiversity corridors and creation of new biodiversity corridors in the form of hedgerows and woodland should be prioritised. The Council should engage with the NPWS to ensure better enforcement of measures to prevent cutting and burning of hedgerows and woodland outside of the designated period under the Heritage Act.

Trees & Afforestation

The Development Plan should seek to increase afforestation and the expansion of woodland areas in Fingal, underpinned by its Tree Strategy. At present the county has a very low rate of tree coverage in the county at about 6% and the Development Plan should chart a course for an ambitious afforestation strategy to meet and exceed the target of 15% tree coverage by 2030. This process should be underpinned by clear annual planting targets and a ringfenced budget to support these measures.

Tree planting can be an excellent community activity, and the Council should consider rolling out community-based tree planting initiatives in urban areas. There is huge potential to engage communities in a positive way around tree planting, the Fingal PPN could offer an important conduit in this regard and the upcoming Climate Action Plan may also be able to offer supports in this regard. Community ownership of planting will increase support for afforestation and ensure that trees are placed where the community has most need of them.

Clear consultation processes should accompany any removal or planting of trees. There can be very clear reasons why a tree may need to be removed; for example, for reasons of public safety, but this not always communicated in advance or in adequate detail. Engagement and openness to dialogue about alternatives with communities should be prioritised.

Parks and Green Spaces

Parks provide huge benefit to our communities, they help us improve our physical and mental health, and enhance our connection to nature. The new Development Plan should provide for public parks which are clean, safe and which provide a haven for biodiversity.

- A coordinated effort should be made to reduce the level of littering and dumping in our parks and green spaces, including additional monitoring and clean-up as necessary. Additional litter wardens should be employed for better enforcement in this area.
- The Ward River Valley Park should be fully developed as a valuable amenity for the people of Swords, and Usher's lake has huge potential as a place for angling enthusiasts as part of this.

Greenways

Greenways provide many benefits to our communities. They provide a recreational amenity, can act as biodiversity corridors, and can boost the local economy by drawing visitors to our area. The new Development Plan should prioritise a well-designed network of Greenways for Fingal.

- The Fingal Coastal Way & Broadmeadow Way should be designed and completed as a matter of priority, and ultimately from part of a broader "Balbriggan to Bray" continuous coastal route. Such a route has the potential to be one of the most valuable pieces of green infrastructure in the country.
- Further Greenway links should be considered between Swords (from the Ward River Valley) to Malahide and from Donabate to Swords.

7. Infrastructure & Utilities

Infrastructure provision covers many areas, from water and waste treatment, to energy and digital infrastructure. An overriding objective for infrastructure provision under the new plan should be to focus on sustainable infrastructure which supports an improved environment and reduced emissions. Flood defences should aim to mitigate against the effects of climate change while also not damaging the natural environment or sensitive habitats. Energy infrastructure should focus on renewables and sustainability. Waste management should prioritise recycling and elimination of waste in the first instance.

Wastewater Utilities

The new Development Plan must ensure that there is sufficient wastewater treatment capacity to service the needs of Fingal's growing population. Wastewater treatment in the county must prioritise the protection of our natural waterways from effluent and untreated discharges from plants.

There is a clear need for improved infrastructure for water treatment in the Naul, which is currently operating at twice its capacity. At present there is a pollution issue relating to the existing Naul Wastewater Treatment plant discharging into the River Delvin, which must be addressed. Water abstraction and warmer summers have been noted to diminish the capacity of the river to sufficiently dilute treated effluent. Alternative options for forwarding of waste to other treatment plants should be considered.

Digital Infrastructure

The Council should seek to promote digital connectivity by expanding the Smart District rollout to additional towns and villages in Fingal. Investment should be made in digital and remote working hubs to facilitate people who want to work remotely from their communities. Additional broadband connection points should be prioritised for rural areas which don't currently enjoy high speed internet. Investment in high quality digital infrastructure will have the ancillary benefit of cutting down on unnecessary commutes, thereby reducing our emissions.

Sports / Recreational Infrastructure

- All residents of Fingal should ideally have access to a public swimming pool a reasonable distance from their home. The most clear example where this is not the case is in the north of the county. As such a swimming pool should be progressed as a matter of priority for the Balbriggan and surrounding area.
- There needs to be investment in simple coastal infrastructure to better facilitate recreational access to the sea – such as steps, rails, changing areas
- Fingal County Council should work with local sports clubs to provide for adequate infrastructure and training facilities for their members. Particular gaps have emerged in recent years where community sports facility needs are not being met by local or national funding options. The need for an athletics track in Lusk is a case in point, as the one of the largest athletics clubs in the county has no training facilities available to it.