

SUBMISSION ON DRAFT FINGAL COUNTY DEVELOPMENT PLAN 2017-2023 For Lands at Scribblestown, Ashtown, Dublin 15



Objective of Submission:

To highlight the available strategic land resource to assist in the delivery of a planned settlement approach befitting of the lands location and proximity to the capital city with available infrastructure.

The subject lands represent, in association with neighbouring lands, a much needed and significant land resource to deliver the required housing for a more sustainable 'compact city' approach to development and where a housing shortage is currently evident.

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TABLE OF CONTENTS

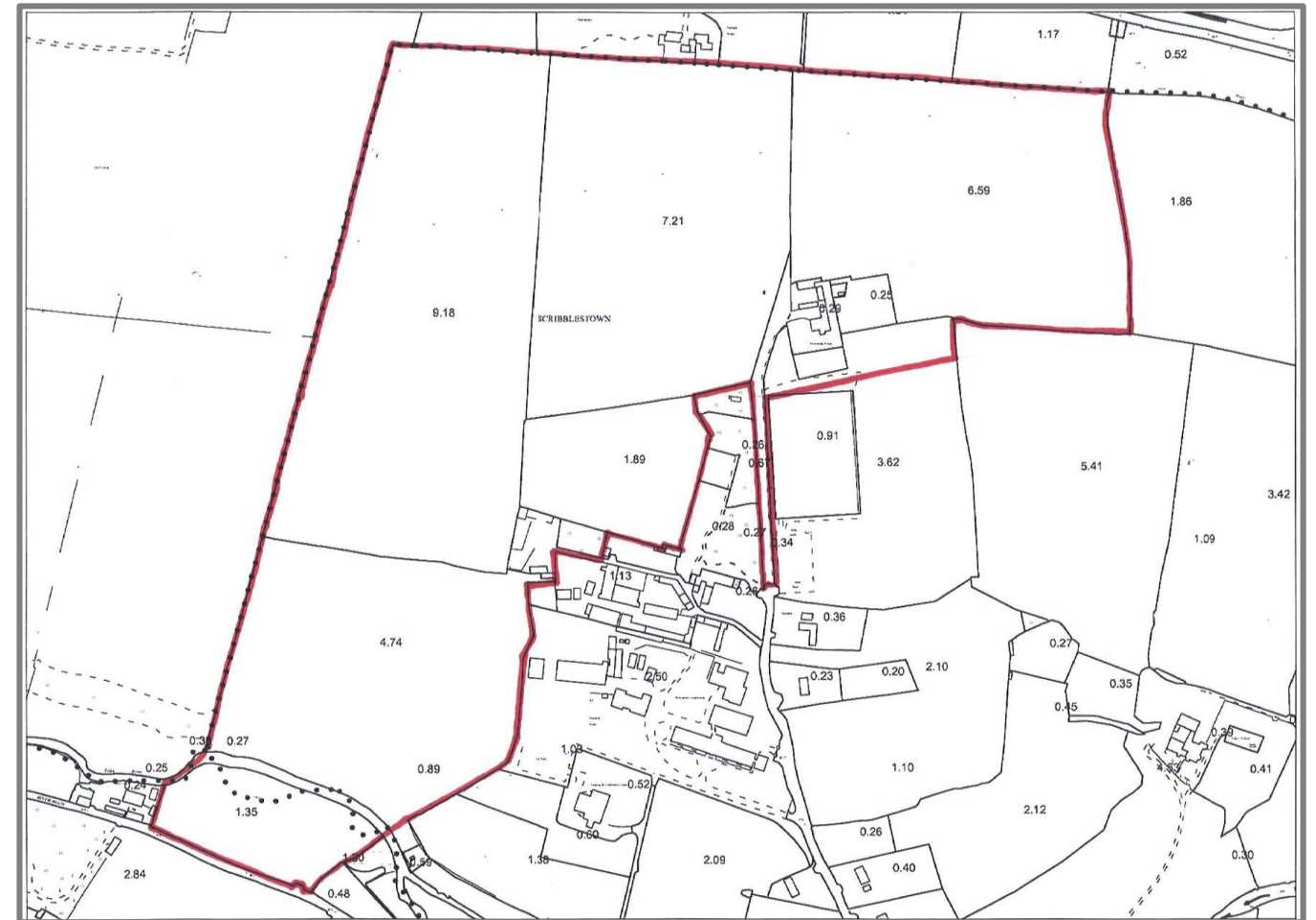
EXECUTIVE SUMMARY

- 1.0 INTRODUCTION
- 2.0 SITE LOCATION
 - 2.1 Transport
 - 2.2 Amenity
 - 2.3 Infrastructure
- 3.0 STRATEGIC OVERVIEW
- 4.0 CURRENT FINGAL COUNTY DEVELOPMENT PLAN 2011-2017
- 5.0 STRATEGIC POLICY
 - 5.1 Planning Policy Statement 2015
 - 5.1.1 Key Priorities – Quality in Planning Outcomes
 - 5.2 National Spatial Strategy (NSS)
 - 5.3 Regional Planning Guidelines
- 6.0 FINGAL SETTLEMENT STRATEGY
 - 6.1 Dublin City Settlement Strategy
 - 6.2 Relevant Policies from Dublin City Development Plan
 - 6.2.1 Consistency with Regional Policy
 - 6.2.2 The Strategic Approach
 - 6.2.3 Making a more Compact Sustainable City
 - 6.2.4 Infrastructural Challenges
 - 6.3 Pelletstown
 - 6.3.1 Pelletstown Local Area Plan 2014
 - 6.3.2 Development Plan Strategic Guidance - Key Developing Area (KDA)
 - 6.3.3 Pelletstown Strategic Development and Regeneration Area
- 7.0 STRATEGY FOR EXPANSION IN FINGAL
 - 7.1 Changes Sought to Fingal County Development Plan

8.0 CONCLUSION

List of Figures

- Figure 2.1 Dublin Sewer Map
- Figure 2.2 Regional Infrastructure
- Figure 3.1 Lands within M50 under the control of Fingal Co.Co.
- Figure 7.1 Fingal Core Strategy Map



EXECUTIVE SUMMARY

The lands at Scribblestown, Dublin 15 that are the subject of this submission are strategically located lands in the context of the expansion of Dublin City.

They are in close proximity to:

- Rail and road public transport services.
- Roads infrastructure
- Expanding wastewater services
- Public amenity facilities
- Established and newly forming communities

The lands are situated approximately 5km northwest of Dublin City Centre and are approximately 8km south of Dublin Airport. The wider land bank that the lands are situated in is one of the largest undeveloped land banks in close proximity to Dublin City Centre.

While the subject lands and the wider area are within the M50 ring and are considered to be in Dublin City, they are under the administrative control of Fingal County Council.

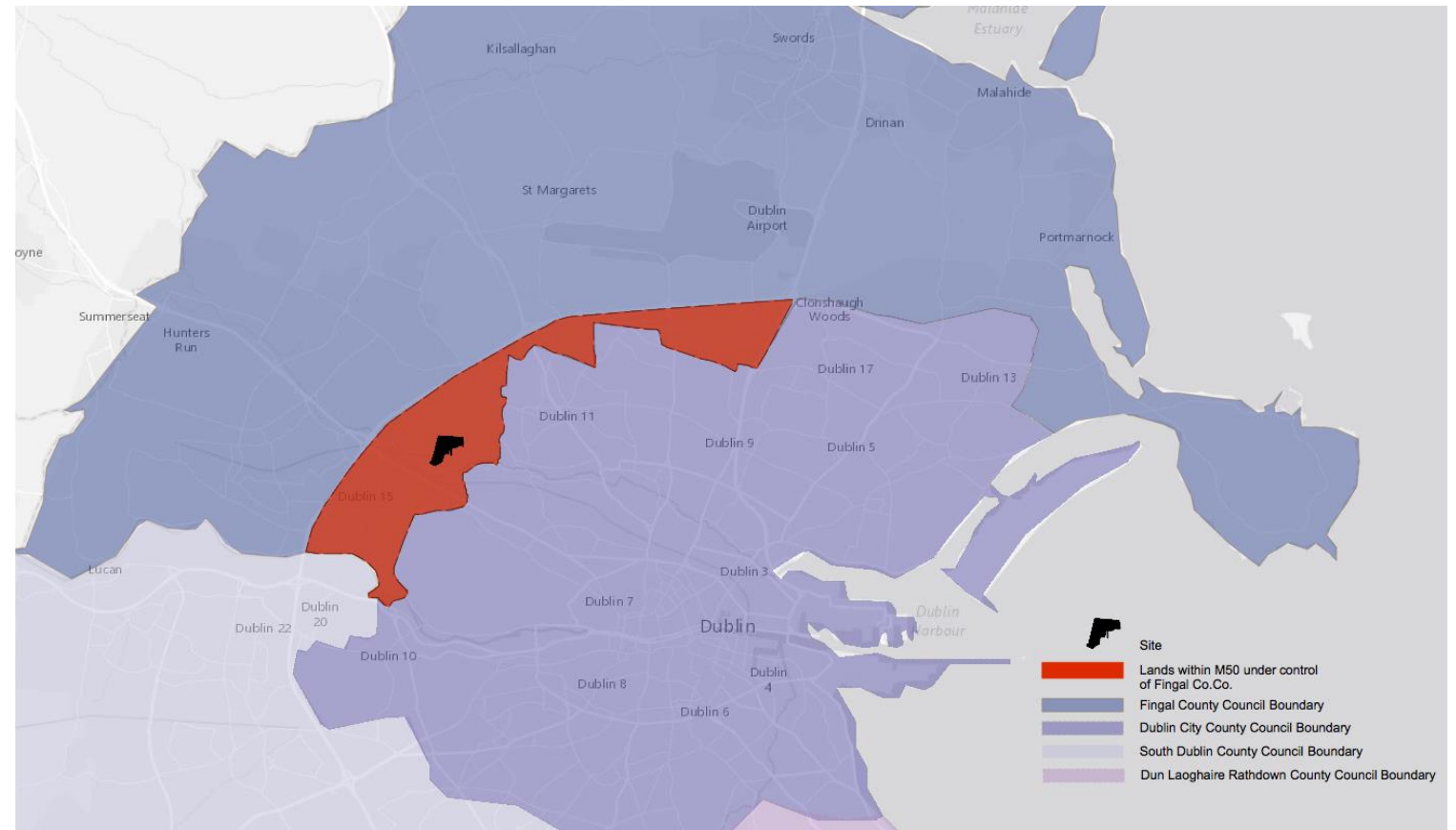
In the preparation of the Draft Development Plan 2017-2023 Fingal County Council have followed the strategic planning guidance set out in the Regional Planning Guidelines document. This regional policy advises Local Authorities to set out a settlement hierarchy for the County and to zone land to cater for expansion. Fingal have focussed their development around their designated centres with Blanchardstown and Swords at the top of their settlement hierarchy and zoned lands around these settlements. They have also zoned a land bank of 221 ha at Lissenhall, Swords for future development.

This outcome to an extent represents the inefficient use of existing and proposed infrastructure within the 'Dublin City' Region. It fails to take cognisance of the policies of the Dublin City Development Plan, the adjoining authority, which seeks to expand in a high density compact form and further rescinds the opportunity to work in tandem with an adjoining Local Authority to achieve a common objective in line with the strategic guidance of the Eastern and Midlands Regional Assembly, as encompassing the former Greater Dublin Regional Authority.

It is submitted that Dublin City lands, including the subject lands, should be at the top of the settlement hierarchy for Fingal County Council. This step would allow Fingal County Council to zone lands to facilitate the expansion of Dublin City as settlement at the fringe of Fingal County. The prioritisation of the development of these lands is justified due to their proximity to existing physical and transport infrastructure and their potential to create sustainable development to facilitate the expansion of the compact city form currently advocated by Dublin City Council planning policy. The evidence of the compact city reaching its outer limit is immediately apparent at Pelletstown which adjoins Scribblestown to the south west.

It is further submitted that the current zoning of the lands for recreation and open space is not wholly justified firstly because the subject lands can be serviced and made ready for development and secondly because there is already a sufficient quantum of recreation and amenity space in the vicinity of the lands in this area. It is therefore submitted that there would not be a negative impact on recreation and amenity in the area if residential development was to take place.

In view of the above it is submitted that steps need to be taken to amend the Fingal settlement hierarchy and to prepare a masterplan or local area plan for the subject lands and the wider area during the period of the next Development Plan 2017-2023 to ensure their sequential release for development in the short to medium term and inevitably to assist in the shortage of housing in the Dublin area.

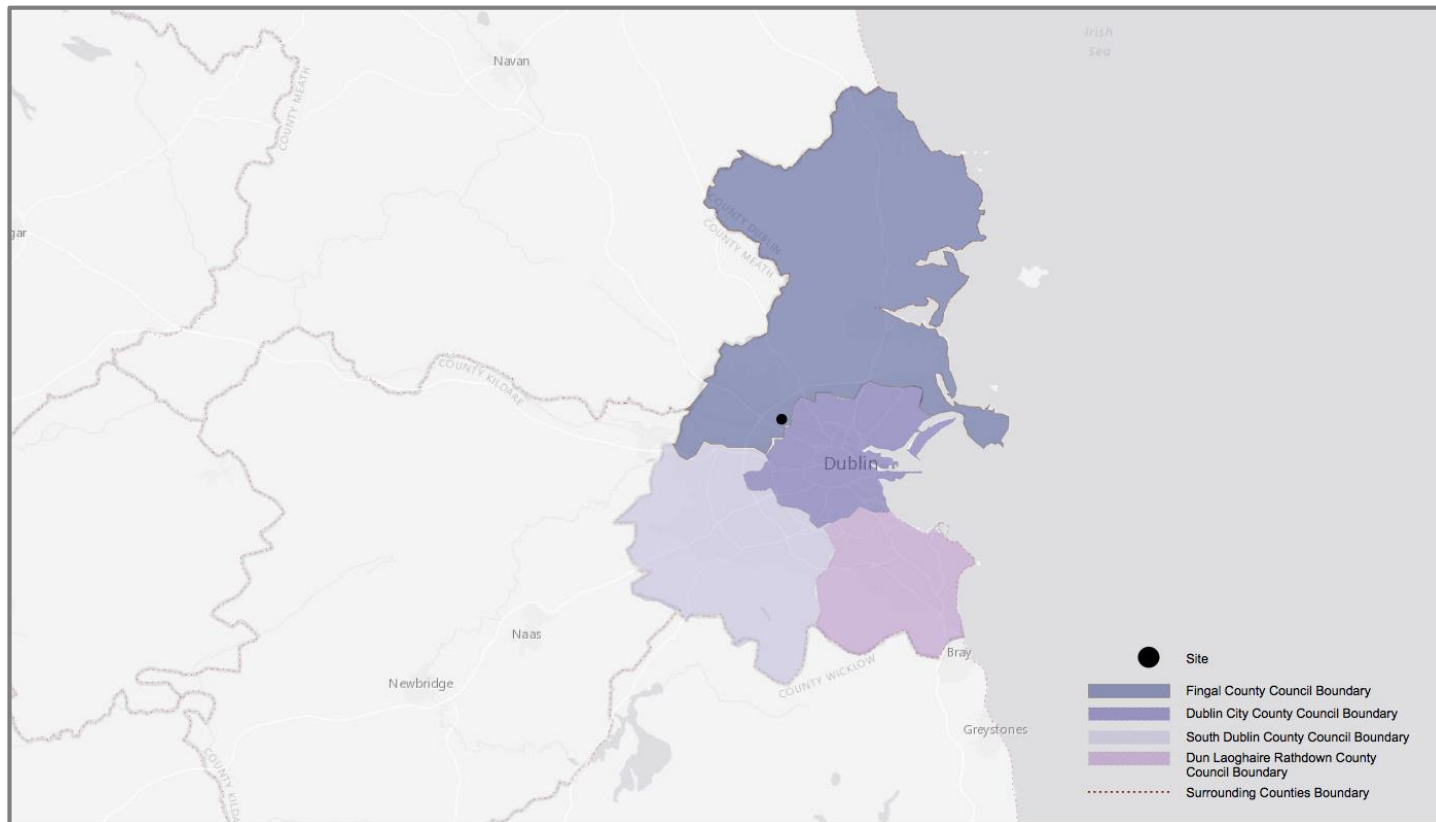


1.0 INTRODUCTION

The Planning Partnership on behalf of our clients Versonwood Ltd, c/o Duff & Phelps (Ireland) Ltd., have prepared this submission to the Draft Fingal County Development Plan 2017-2023. Whilst the submission concerns lands (circa 40 hectares) within our Clients ownership that are located at Scribblestown, nr. Ashtown, Dublin 15 it also relates to a larger strategic landmass principally surrounding the lands outlined in red on the extract from the Zoning Map on the cover page and above.

2.0 SITE LOCATION

The lands are located at Scribblestown and Dunsink approximately 5km northwest of Dublin City Centre. The lands are enclosed by the M50 motorway to the northwest. The district of Finglas is situated to the east with Pelletstown and Castleknock to the south. The lands are also in proximity to Blanchardstown to the west on the far side of the M50. The lands are approximately 38 hectares in area.

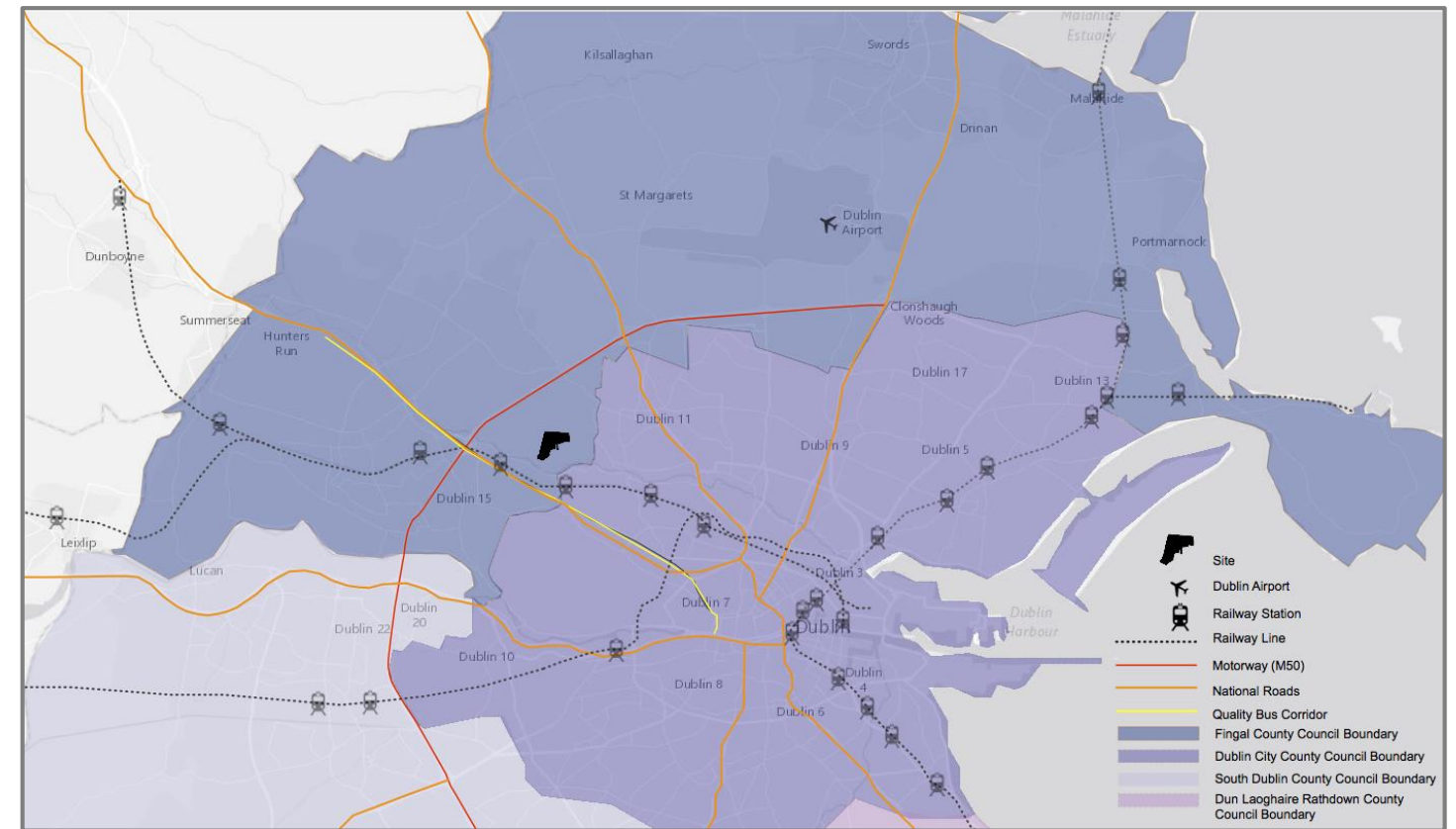


2.1 Transport

There is a public transport corridor running east west to the south of the lands formed by the Maynooth commuter railway line. There is also a Quality Bus Corridor which runs to Blanchardstown running along this axis.

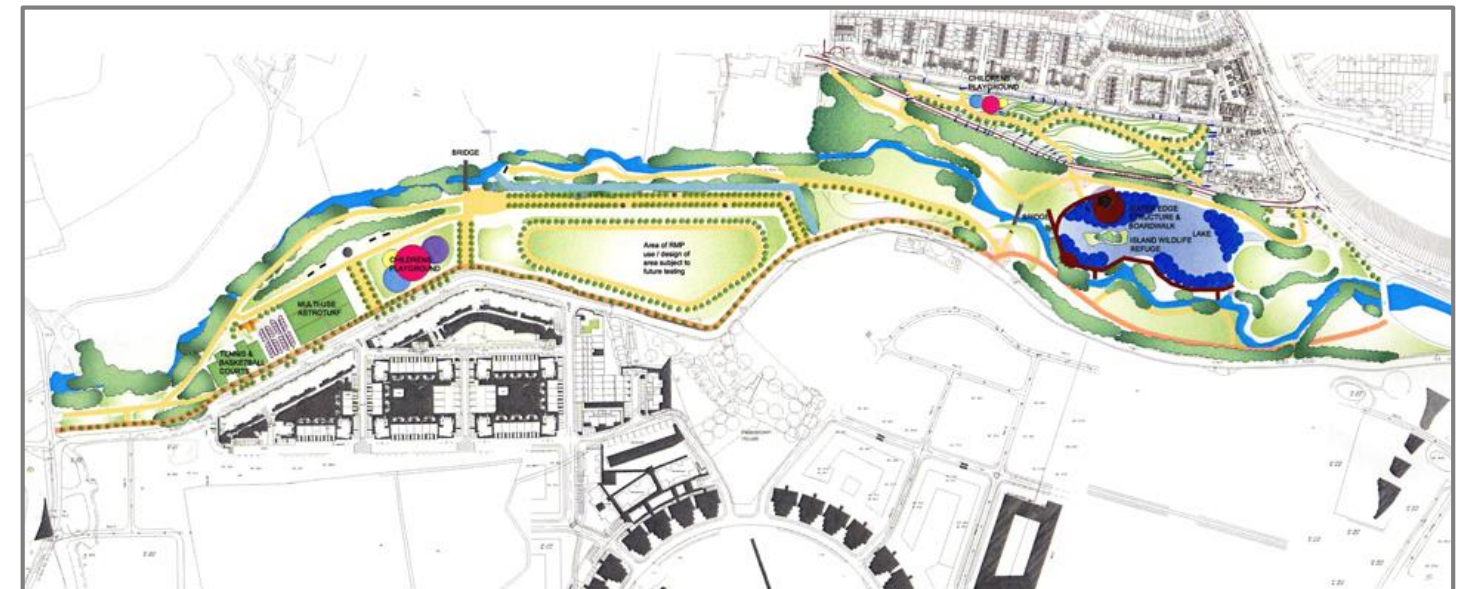
There is a long term objective to develop a Metro Line called Metro West running south-north to the west of the site on the west side of the M50 with a station at Tolka Valley.

The lands are less than a kilometre from the Blanchardstown M50 interchange providing good access to many parts of the city and outlying areas including Dublin Airport (8km away) and suburban areas including Swords and Blanchardstown.



2.2 Amenity

There is an amenity/ parkland corridor running east-west to the south of the lands through the Tolka Valley. The parkland is landscaped and maintained at Pelletstown but becomes more wild and unmaintained as you approach Scribblestown. There is definite scope to continue to formalise the landscape and accessibility to the Tolka Valley Park at the Scribblestown end, for an amenity parkland to provide residential amenity to communities on both sides of the river valley.

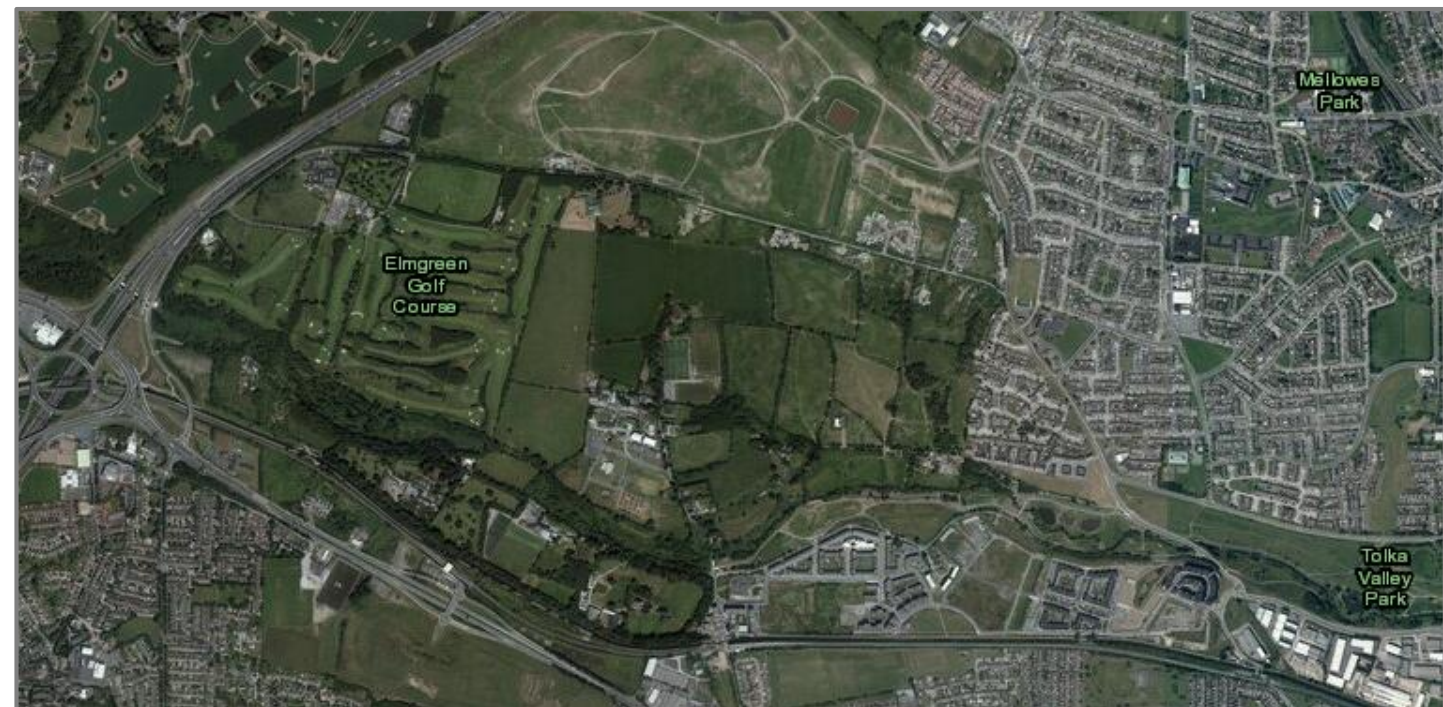


The former Dunsink Landfill is located to the north of the lands. It is understood that these lands are in the ownership of Fingal County Council. It is noted that there is an objective in the current Fingal Development Plan to develop a

Regional Park at this location. It is submitted that these lands have the potential to serve as a community amenity area accessible to both the subject lands and the district of Finglas to the north and east.

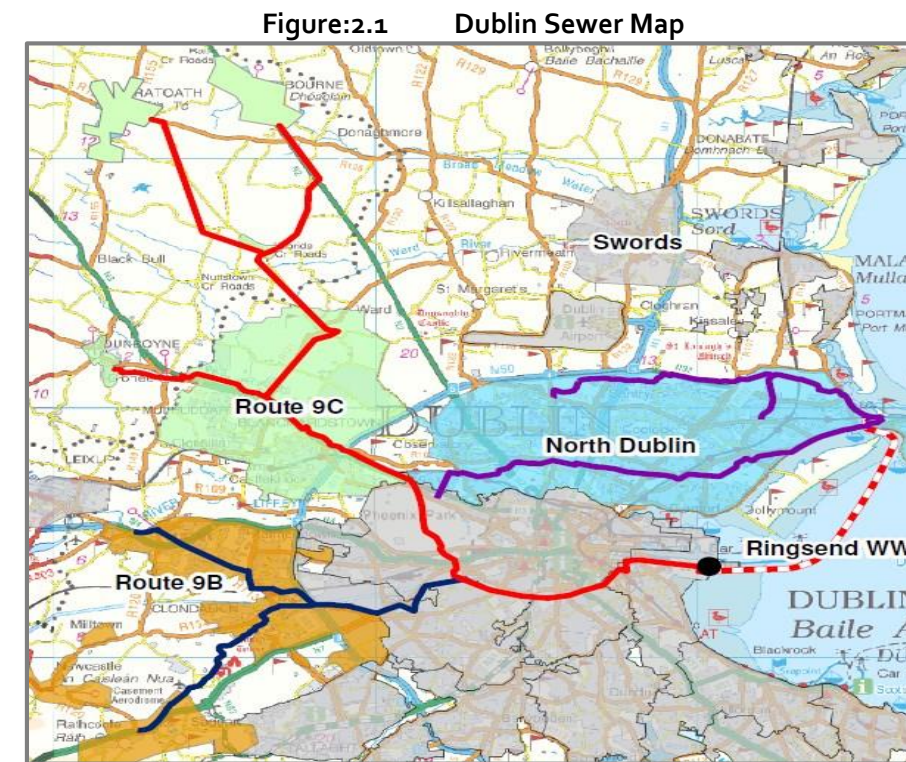


Elmgreen Golf Course is located to the west of the subject lands and constitutes a fully operational semi-private amenity space in the neighbourhood.



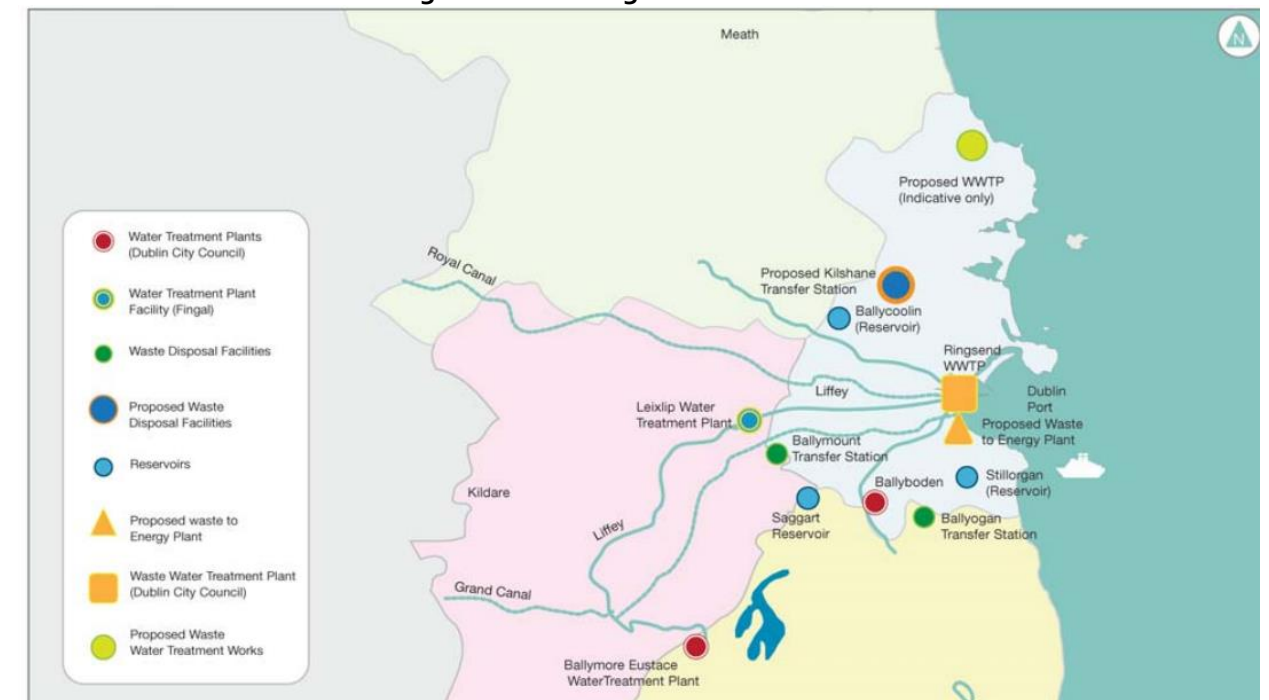
2.3 Infrastructure

The Greater Dublin Drainage project aims to provide extra wastewater treatment capacity for the Dublin region. The route of the Orbital sewer that is part of this project runs to the northwest of the lands at Scribblestown. Irish Water is managing the planning stages of the Greater Dublin Drainage project which involves the preparation of a planning application to be submitted towards the end of 2016 to the independent planning authority, An Bord Pleanála for its adjudication. The lands are also in close proximity to the g9C Trunk Sewer which runs west east to the south of the site terminating at Ringsend Wastewater treatment plant.



Source: Greater Dublin Drainage Project

Figure 2.2 Regional Infrastructure



Source: Dublin City Council Development Plan 2011-2017

4.0 CURRENT FINGAL COUNTY DEVELOPMENT PLAN 2011-2017

Zoning Objective

The majority of the lands are zoned 'OS' Open Space – To preserve and provide for open space and recreational amenities. The vision for this objective 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.'

A portion of the lands on either side of the River Tolka is zoned Objective 'HA' High Amenity – To protect and enhance high amenity areas. The vision for this objective is:

'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.'

It is submitted that should a Local Area Plan be produced for Scribblestown and a portion of lands are zoned for residential development, there will still be adequate recreational and amenity resources to cater for the surrounding population. The following amenities would be available locally:

Amenity	Area	Distance from site
Dunsink Regional Park	230 acres	100m
Tolka Valley Park	50 ha	500m
Royal Canal Tow path		1km
St Brigid's GAA Club	11 acres	2km
Coolmine Rugby Club	8 acres	500m
Elm Green Golf Club	110 acres	200m
Phoenix Park	707 ha	2km

In view of the above it is submitted that even if a portion of the lands at Scribblestown are redeveloped, there will still be a sufficient quantum of lands in the vicinity to provide recreational and amenity resources for the surrounding population

Local Objective

The subject lands are within an area to which Local Objective (553) applies. It states:

'Undertake a study of lands at Dunsink, bounded by the M50, the N3, the Dublin City boundary and the Cappagh Road as delineated on the development Plan maps, in order to determine the most appropriate uses for the lands while keeping in mind the need to preserve views northwards across the Tolka Valley area. The study will include an extensive public participation exercise involving both the general public and the various stakeholders in the area.'

It is submitted that the above objective effectively calls for the preparation a masterplan for the subject lands at Scribblestown and the surrounding area. We believe this objective supports our submission and request for the preparation of a Local Area Plan for this area.

Landscape Designation

The subject lands are included in an area designated as a 'highly sensitive landscape' with a high landscape value in the County Development Plan.



We submit that only the area adjacent to the Tolka River zoned 'High Amenity' is a highly sensitive landscape. It is acknowledged that the Dunsink observatory to the north is vulnerable to light pollution, however it is argued that this can be protected through considered design and layout. The remaining lands are unusual because they are a mature rural landscape within the M50 ring. However, just because they are one of the last remaining greenfield land banks in the city does not make them highly sensitive rather makes them appropriate for development in the context of a wider adequate and available open space network locally.

5.0 STRATEGIC POLICY

A new National Planning Framework is currently being developed to succeed the National Spatial Strategy. It will provide a framework for national planning, pulling together relevant Government policies and investment on national and regional development. The Planning Policy statement quoted from below represents the first stage in the preparation of the national framework.

5.1 Planning Policy Statement 2015

The Planning Policy Statement 2015 was published by the Department of Environment, Community and Local Government. The aim of the document is to reaffirm the Governments strong belief in:

'the value of forward-looking, visionary and dynamic planning process because it will ensure that the right development takes place in the right locations and at the right time and in providing the social, economic and physical infrastructure necessary to meet the needs of Irish people in a way that protects the many qualities of the natural and built environment.'

The Government believes that the planning process must provide:

- Opportunities for communities to help shape the future of their areas;
- Effective co-ordination in the work of local authorities and other public bodies; and
- Clear guidance to potential developers in securing public policy aims.

5.1.1 Key Priorities Quality in Planning Outcomes

Section 4 of the document outlines key priorities for quality in planning outcomes. It states:

The planning process plays a very significant role in promoting patterns of development which help Ireland meet its international obligations by:

- Tackling the sources of climate change by reducing Irelands carbon footprint;
- Securing less energy and travel intensive development patterns;
- Facilitating the generation of energy from low carbon sources; and
- Adapting to the effects of climate change.

This document points out the importance of effective co-ordination in the work of local authorities. It is considered that the expansion of Dublin City into lands within the M50 ring but under the administrative control of Fingal County Council is an instance that demands effective co-ordination.

It is submitted that the rezoning of the lands at Scribblestown for residential and/or mixed use development would endorse many of the objectives outlined above, particularly by facilitating the expansion of the compact city form advocated by Dublin City Council. Allowing residential development at this location would also contribute to less energy intensive travel development patterns and in turn reduce Irelands' carbon footprint. The strategic importance of the lands and their context might also be best delivered via a Plan Objective for a structured and planned form of development via a local framework plan approach or a Strategic Development Zone (SDZ). The planning authority should be mindful in this regard of the quickest and most effective delivery mechanism considering the urgency of the current housing crisis.

5.2 National Spatial Strategy (NSS)

The National Spatial Strategy whilst acknowledged as being replaced by a new national planning frameworks is still relevant in terms of its aims to achieve a better balance of social, economic and physical development between regions.

Importantly its focus is on the relationship between people and the places where they live and work are of relevance when considering future predicted patterns of development and the consideration of lands suitability for development. The Strategy (as it was) sought to unlock potential for progress, growth and development in a more balanced way across Ireland supported by more effective planning.

The Strategy made the observation that:

The pace of development in Ireland over the last decade has been remarkable. But progress has been uneven, with some areas developing faster than others. This has led to rapid development and congestion in some places but underdevelopment in others. Patterns of unbalanced development could continue and worsen, posing increasing threats to the competitiveness of Irelands' economy, the quality of our environment and most of all, the quality of peoples' lives.

Within the body of the Strategy it states:

*There is strong evidence that **Dublin is becoming a 'Dispersed City'** demonstrated by the fact that the hi-tech industries located around the cities edges are drawing their workforces from places up to and beyond 80 kilometres away, but within about an hour's drive of peoples' workplaces. New hotels, major industrial parks, technology campuses, out of town shopping centres, suburban business and office parks, improved roads, relatively low road fuel prices, higher car ownership and availability and use of certain commuter train services have created an increasingly dispersed form of growth in the Greater Dublin Area and beyond.*

Current trends in spatial development are likely to adversely affect more and more peoples' quality of life, the quality of the physical environment and overall national economic competitiveness. Some of these trends will add to regional and global environmental problems. For example, the manner in which some major urban areas, particularly Dublin are tending to develop is making the provision of necessary infrastructure such as public transport expensive and difficult.

***The physical consolidation of Dublin, supported by effective land use policies for the urban area itself, is an essential requirement for a competitive Dublin.** Consolidation is also required for the public transport system to function effectively. In turn, investment in public transport will assist in promoting a more efficient and competitive Greater Dublin Area.*

The NSS advised that bodies with responsibility for Strategic Planning should take the following action:

*Carry out a comprehensive and systematic **audit of all vacant, derelict and underused land to establish its capacity to accommodate housing** and other suitable uses. Such an audit should be focused in particular on areas in or close to public transport corridors and areas with under-utilised physical and social infrastructure. (e.g. schools)*

It will be critical to provide for an adequate supply of land in line with assessments of housing land needs, through the development plan system. Such provision will require:

- **Strategic reservation of land** through the development plan process, coupled with ensuring timely and sequential release of land, to avoid delays in the availability and servicing of land on the one hand and premature release of zoned land on the other.
- **Broad evaluation frameworks** such as that suggested in Box 5.2 as an aid to the most appropriate spatial locations for housing land.

Section 5.3.1 of the Strategy outlined a checklist for Housing Location in Urban Areas and summarised in Box 5.2 as follows:

Box 5.2 National Spatial Strategy

The Asset Test	Are there existing community resources such as schools etc, with spare capacity?
The Carrying Capacity Test	Is the environmental setting capable of absorbing development in terms of drainage etc?
The Transport Test	Is there potential for reinforcing the use of public transport, walking and cycling?
The Economic Development Test	Is there potential to ensure integration between the location of housing and employment?
The Character Test	Will the proposal reinforce a sense of place and character?
The Community Test	Will the proposal reinforce the integrity and vitality of the local community and services that can be provided?
The Integration Test	Will the proposal aid an integrated approach to catering for the housing needs of all sections of society

Source: National Spatial Strategy 2002-2020

It is submitted that the strategic reservation of the subject lands and the surrounding area and the preparation of a masterplan or local area plan for them will ensure the timely and sequential release of these lands for development in adherence to the National Spatial Strategy.

While investment in physical infrastructure is currently taking place via the Greater Dublin Drainage Project and public transport infrastructure is already in place, further preparatory steps could be taken over the next development plan period to ensure the social infrastructure requirements highlighted by Box 5.2 above are enhanced and ready to receive and facilitate further development in the future.

This document (NSS) which was first published in 2002 aimed to promote integrated strategies for physical, economic and social development particularly with regard to the integration of planning, land use and transportation. It is submitted that the lands that are the subject of this submission have the attributes to allow for the delivery of the NSS vision. Secondly because of their geographic position these lands offer the next logical land bank for development within Dublin City which will consolidate the development of the city and arrest the dispersed pattern of Development in the Greater Dublin Area identified by the National Spatial Strategy in 2002.

5.3 Regional Planning Guidelines

The Regional Planning Guidelines for the Greater Dublin Area 2010-2012 aimed to direct the future growth of the Greater Dublin Area over the medium to long term. The RPGs informed and directed the City and County Development Plans in each of the County Councils in the Greater Dublin Area. The RPGs sought to assist each of the County Councils in the Greater Dublin Area in working together for the better planning of the entire metropolitan area and the surrounding Mid-East Region.

Strategic Policy SP1 of the Guidelines, the RPGs settlement strategy encourages the focusing of new housing development on consolidation within the existing footprint with particular emphasis placed on the metropolitan area. The RPGs also state that the delivery of housing, needs to follow sustainable models by avoiding low density car based development forms and focusing on medium densities which will support and integrate with a range of community facilities within accessible walking distances. Where lands are close to public transport nodes/stations or Quality Bus Corridors, the density and connectivity of developments should directly support increased population densities with the ability to benefit from good transport links.

6.0 FINGAL SETTLEMENT STRATEGY

Section 2.4 of the Fingal Core Strategy deals with the Draft Development Plan 2017-2023 adherence to the Regional Planning Guidelines. It states:

The RPG Settlement Hierarchy identifies a hierarchy of settlement types within the Metropolitan and Hinterland areas of each county and the appropriate policy for growth within them.

The Settlement Hierarchy is reproduced in the table below.

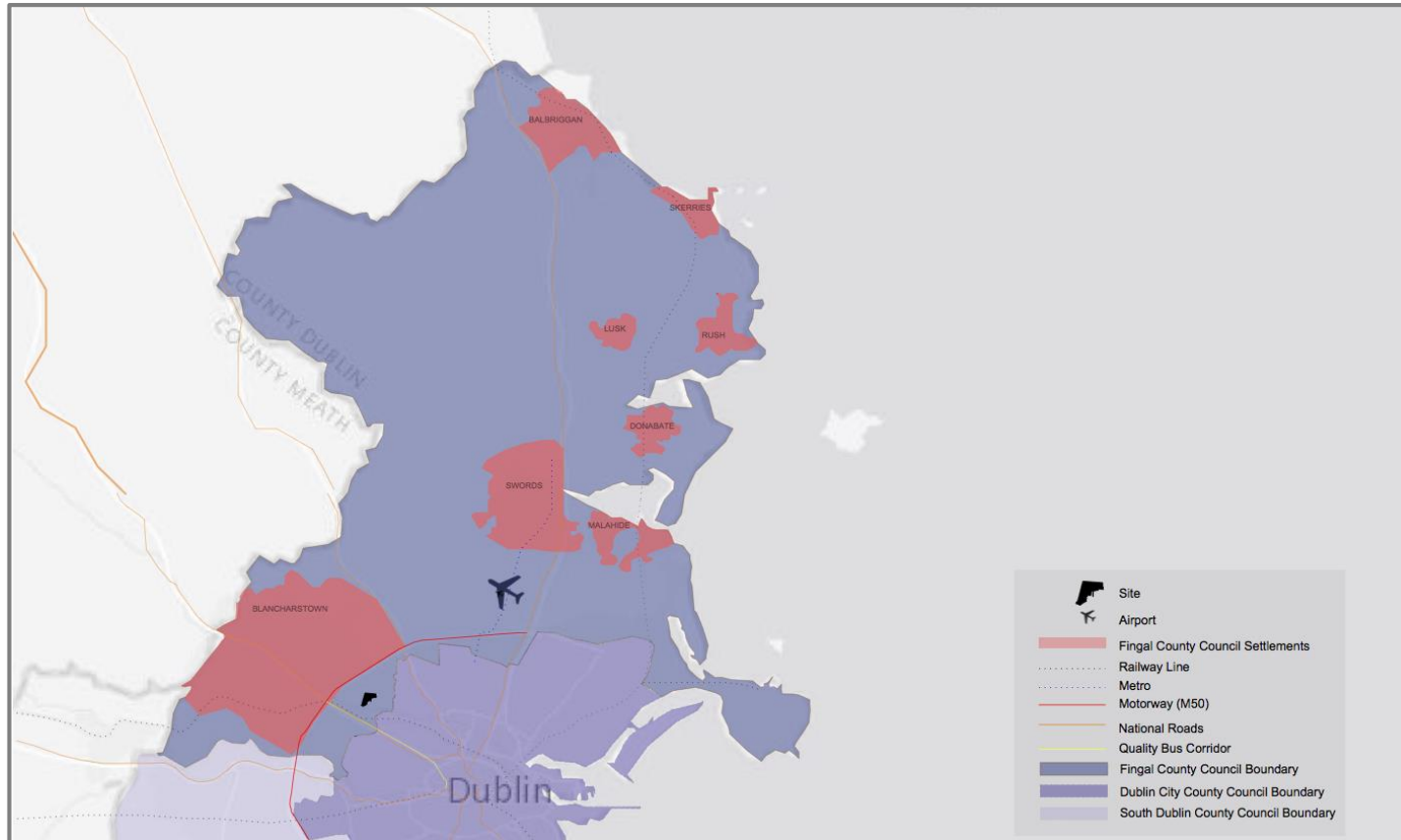
Hierarchy	Description	Locations
Gateway Core	International business core and high density population, retail & cultural activities	Dublin City Centre & Immediate suburbs
Metropolitan Consolidation Towns	Strong active urban places within metropolitan area with strong transport links	Swords, Blanchardstown, Lucan, Clondalkin, Tallaght, Dundrum, Dun Laoghaire, Bray
Large Growth Towns I	Key destinations, economically active towns supporting surrounding areas, located on Multi Modal Corridor in metropolitan hinterland.	Navan, Naas, Wicklow, Drogheda
Large Growth Towns II	Smaller in scale but strong active growth towns, economically vibrant with high quality transport links to larger towns/city	Newbridge, Greystones, Arklow, Cherrywood, Balbriggan, Dunboyne, Maynooth, Leixlip.
Moderate Sustainable Growth Towns	i) In metropolitan area, strong edge of metropolitan area district service centres, high quality linkages and increased densities at nodes on public transport corridors. ii) In Hinterland areas, 10k from large town on public transport corridor, serve rural hinterland as market town.	Donabate, Celbridge, Lusk, Rush, Ashbourne, Dunshaughlin, Kells, Trim, Kildare, Monasterevin, Kilcullen, Kilcock, Blessington, Athy, Newtownmountkennedy
Small Towns	Good bus or rail links, 10k from large growth towns	To be defined by Development Plan
Villages		To be defined by Development Plan

It is submitted that the lands at Scribblestown, subject of this submission, would fall within the *Gateway Core* of Dublin City Centre and immediate suburbs and are therefore at the top tier of the settlement strategy. Yet when Fingal set out their remaining and proposed residential zoned land in Tables 2.6 and 2.7, they appear to have omitted or ignored the lands in the top tier, of the Gateway hierarchy completely.

They (Fingal Co. Co.) focus the provision of zoned land on Swords and Blanchardstown, which we acknowledge are also in the metropolitan area but in terms of the sequential approach to the expansion of Dublin City set out by the Regional Planning Guidelines these settlements are in a lower tier in terms of priority for development than the subject lands' city

centre / immediate suburbs status/location. It is anticipated that as long as the subject lands are omitted from the Gateway Core at the top of the settlement hierarchy, they will not be considered by Fingal County Council for development. It is therefore submitted that the settlement strategy be amended to clearly include city centre fringe lands as being part of the Gateway Core.

The Draft Fingal Plan moves further away from the guidance in the Regional Planning Guidelines by designating Lissenhall outside Swords as a strategic land bank and zoning 221 hectares for residential development. Given that the lands at Scribblestown benefit from existing public transport and includes rail links the settlement strategy being proposed by Fingal in the Draft Development Plan appears to be completely contrary to the policy of consolidation being promoted by strategic regional policy within the Greater Dublin area.



6.1 Dublin City Settlement Strategy

'The overarching theme of national planning policy is the consolidation and sustainable use of land in urban areas, particularly urban environments well served by public transport. Urban consolidation is a key component in the achievement of sustainable development economic competitiveness, community well-being, environmental protection and also to achieve full economic value from investment in public infrastructure.' (Pelletstown LAP 2014)

The theme of consolidation and sustainable use of land in urban areas is prevalent throughout the strategic documents which guide planning policy in Ireland namely;

- The National Spatial Strategy 2002-2020 and
- The Regional Planning Guidelines

These policies are harnessed from these strategic documents and applied at a local level in the:

- Dublin City Development Plan
- Fingal County Development Plan

However this submission intends to demonstrate that the intent of this forward planning strategy has been lost/diluted due to the manner in which County Dublin has been administratively divided and secondly due to the process by which the administration of Fingal follows in order to designate sufficient zoned land for its expanding County.

6.2 Relevant Policies from Dublin City Development Plan

The Dublin City Development Plan advocates the expansion of the city in a sustainable compact city. The current vision for Dublin reads:

*Dublin through the shared vision of its citizens and civic leaders will be a **beautiful compact city** with a distinct character, a vibrant culture and a diverse, smart, green, innovation-based economy. It will be a socially inclusive city of urban neighbourhoods, all **connected by an exemplary public transport, cycling and walking system** and **interwoven with a quality bio-diverse greenspace network**.*

6.2.1 Consistency with Regional Policy

Section 3.2.1 states:

All the policies and objectives of this Dublin City Development Plan flow from and are consistent with these higher level national and regional policies in that they promote intensification and consolidation of Dublin city, all of which lies within the metropolitan area. This will be achieved by way of:

- in-fill and brownfield development,
- regeneration and renewal of the inner city;
- redevelopment of strategic regeneration areas,
- use of higher densities especially in public transport catchments.

These measures support an effective public transport system and the emergence of a critical mass for the city to compete at an international level and fulfil its role as the national gateway and driver of the national economy.

The development plan policies also underpin the creation of a compact city with mixed use environments, sustainable neighbourhoods and green infrastructure to reduce the cities reliance on fossil fuels and provide for carbon soakage, all in accordance with the National Climate Change Strategy.

6.2.2 The Strategic Approach

Section 4.3 states:

The development plan vision for the urban form and structure of the city is based on a number of key approaches which imbue the whole plan, namely:

- *The **creation of a more compact city** where residents can live and work in close proximity, thereby reducing urban sprawl and unsustainable travel patterns.*
- *The creation and nurturing of **sustainable neighbourhoods close to public transport** and a range of community infrastructure, in quality, more intensive mixed use environments.*

6.2.3 Making a more Compact Sustainable City

Section 4.4.3 states:

*The NSS 2002-2020 recognises the importance of Dublin as a national and international economic driver, and clearly states that it is **not sustainable for low-density growth to spread throughout the region**. The Regional Planning Guidelines for the Greater Dublin Area 2004-2016 further emphasise the need to consolidate the Dublin metropolitan area. Given the **diminishing supply of undeveloped land in the city**, this approach will entail an increase in overall densities.*

The Dublin City Development Plan 2005-2011 set out a spatial strategy to steer growth in both the inner and outer city in order to achieve sustainable densities and produced an average density of 135 units per hectare (uph), mostly in apartment schemes.

6.2.4 Infrastructural Challenges

Section 5.2.2 states:

The Dublin region is facing a number of infrastructural challenges particularly in the supply and demand for high quality drinking water and for waste water treatment. The main challenge to be addressed regarding drinking water supply and wastewater treatment are centred on meeting future increasing demand due to population growth, improving the efficiency of the existing networks and encouraging water conservation. The Dublin Region Water Supply Project is in progress to identify a new water supply source to avoid shortages of drinking water in the future. The city needs to develop additional capacity for storing treated water to alleviate the risks of water shortages occurring in the event of extreme weather or other mishap.

Progress in the development of the Greater Dublin Regional Wastewater Treatment Plan, Marine Outfall and orbital sewer to be located in the northern part of the Greater Dublin Area is essential to the future growth of the Dublin region.

All of the above policy statements are directed towards expanding the City of Dublin in a sustainable, compact, high density form. The policies identify the finite supply of undeveloped land in the city and emphasise the need to increase densities in order to make the most efficient use of investments in physical infrastructure and public transport.

The fact that undeveloped lands at Scribblestown are under the control of Fingal County Council does not make them exempt from this form of policy approach. However, at the same time, it can be seen in the next section that Fingal Development Plan policies are similar in intent to those of Dublin City Council. As such the reluctance to zone these lands for residential development could be merely an oversight on the part of Fingal County whereby they have focussed on their existing settlements and the fringe lands within the M50 corridor have been mistakenly omitted.

It is respectfully contended that by zoning / rezoning these lands for *inter alia* residential development Fingal can co-operate with Dublin City Council meeting national and regional objectives and facilitating the achievement of the objective of a compact city approach.

6.3 Pelletstown

The district of Pelletstown is in relatively close proximity to the lands at Scribblestown. It is at the opposite site of the Tolka Valley to the southeast and is in the jurisdiction of Dublin City Council. A substantial amount of high density residential development has been built there in recent years. Development in this area is guided by the Pelletstown Local Area Plan 2014 and the district is listed as a '**Key Development Area**' in the Dublin City Council Development Plan. Excerpts from the Pelletstown Local Area Plan are presented below.

6.3.1 Pelletstown Local Area Plan 2014

The Dublin City Development Plan 2011-2017 provides a clear spatial framework to guide the future growth and development of the city in a coherent, orderly and sustainable way, framed on a vision of city living and a core strategy seeking:

- *A compact, quality, green, connected city,*
- *Real economic recovery, creative networks and a smart innovative city,*
- *The creation of sustainable neighbourhoods and communities.*

The development plan strategy for the city has a strong policy emphasis on the need to gain maximum benefit from existing assets such as public transport and social infrastructure, through the continuation of consolidation and increasing densities within the existing built footprint of the city.

This is in line with the regional planning guidelines policy of consolidation of the metropolitan core. A further key aspect is that future expansion whether housing or mixed uses, occurs in tandem with high-quality rail based public transport and on a phased basis within the context of local area plans.

6.3.2 Development Plan Strategic Guidance - Key Developing Areas (KDAs)

KDAs are areas in the city with substantial development capacity and the potential to deliver the residential, employment and recreational needs of the city. All the KDA locations are served or proposed to be served by high quality rail-based public transport and relate to a zoning objective which seeks the social, economic, physical development or rejuvenation of an area with residential, employment and mixed uses.

The development plan core strategy sets out the relative share of housing growth and identifies the employment/commercial capacity of each KDA. The Pelletstown KDA has an estimated residential capacity of 1,800 housing units on a site of 41 Ha. Given that the area is zoned for mixed uses, significant housing development will take place in association with other uses such as retail, office or community uses.

6.3.3 Pelletstown Strategic Development and Regeneration Area

The development plan seeks to realise the full potential of the SDRAs. These are areas with the potential to deliver a significant quantum of residential development and ancillary commercial and service development.

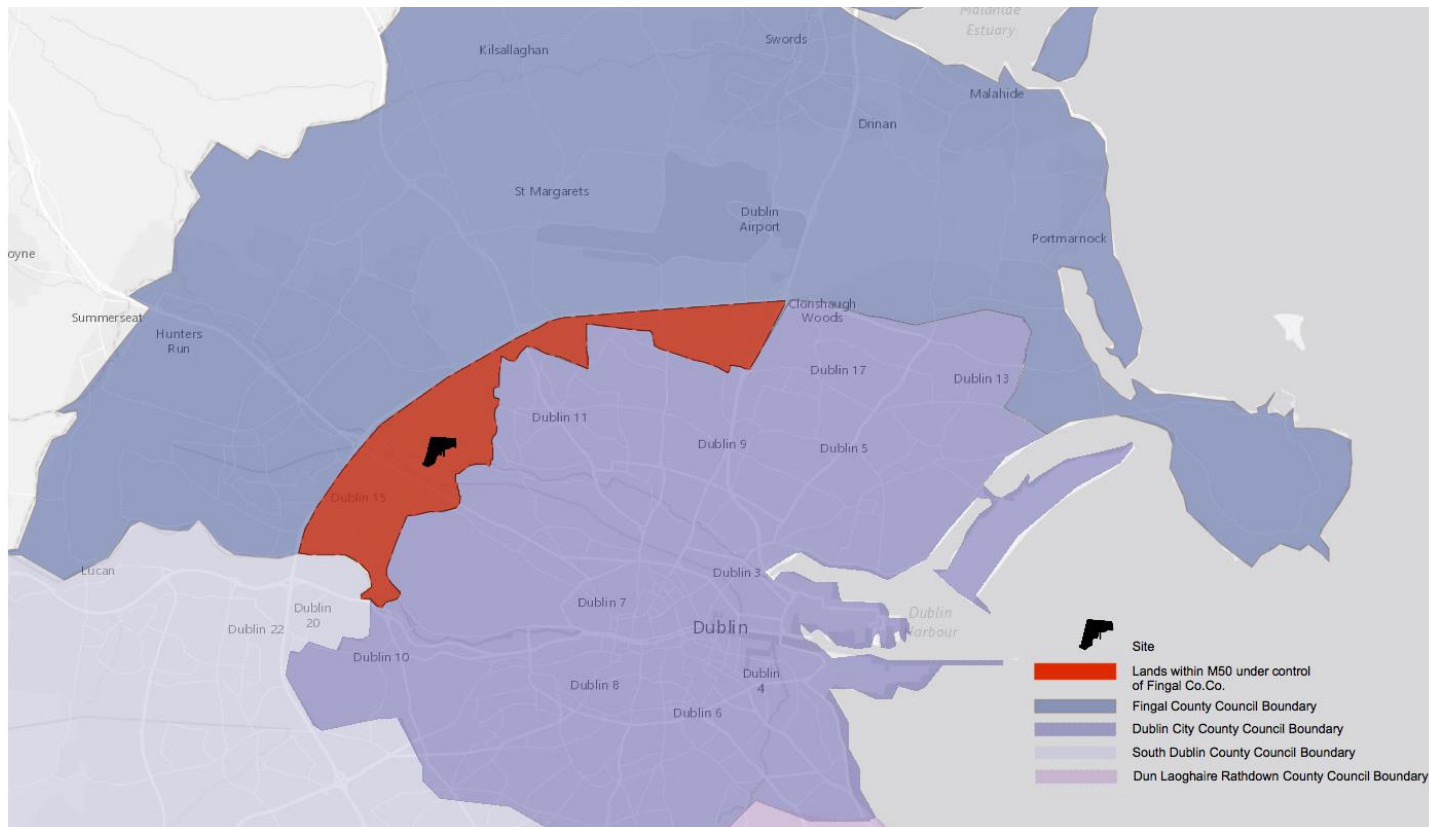
Approximately half of the area within the Pelletstown Local Area Plan has been developed as high density housing. The remainder is likely to be developed in the short term as a result of pressure for new housing stock in Dublin City. It is submitted that the next logical step in terms of the expansion of the City would be to prepare a Local Area Plan for the Dunsink/Scribblestown Area so that any proposed development could complete the planning process during the term of the current Draft Fingal Development Plan and in turn be scheduled for development in the next Development Plan period. It is respectfully submitted that any framework or Local Area Plan should be produced in partnership with Dublin City Council, given the lands close proximity to Pelletstown and to allow for continuity of urban form across the County boundary.

7.0 STRATEGY FOR EXPANSION IN FINGAL

The population expansion plan for the County of Fingal is handled in much the same way as in other Counties in Ireland. The Regional Planning Guidelines identify a hierarchy of towns and villages and zoned land in the vicinity of these settlements is provided for their expansion. In Fingal the hierarchy of settlements is set out in table 2.8 of the Draft Development Plan as follows:

Metropolitan Area	Land Supply ha
Consolidated Towns	
Swords	514
Blanchardstown	320
Consolidated Towns within the Gateway	
Malahide	88
Portmarnock	57
Howth	16
Baldoyle/Sutton	29
Other (Charlestown/Meakstown)	71
Moderate Sustainable Town Growth	
Donabate	116

This approach would be acceptable if Fingal was an individual county, but it is not, it is part of County Dublin, a county which is dominated by the urban area of Dublin City. It can be seen from the map below that the jurisdictional boundary of Fingal falls inside the M50 ring. This has created a land parcel between this boundary and the M50. This land parcel contains the villages of Castleknock, Finglas, Ballymun and Santry. These areas are in the heart of Dublin City and yet at the same time they are on the periphery of Fingal County.



It is clear from the current core strategy map (Figure 7.1) that the subject lands have been ignored as strategic development land for Dublin City because they do not adjoin any of the designated settlements in Fingal County. The fact that these settlements are on the periphery of Fingal is clearly demonstrated by Fingal collectively naming a portion of this area South Fingal Fringe.

Figure 7.1 Fingal Core Strategy Map.



Source: Fingal Draft County Development Plan 2017-2023

The development plan states:

South Fingal Fringe is an umbrella term for Charlestown, Meakstown, Ballymun, Santry, Clonsillaugh Belcamp, Balgriffin and lands between the M50 and the Airport this area is included in the three electoral areas of Swords, Castleknock/Mulhuddart, and Howth/Malahide.

The lands are nationally important given their location south of Dublin Airport and their proximity to the M50 and M1. At a county and local level the lands are important as they act as a gateway to Fingal. For the majority of citizens and visitors, this area provides the first impression of the County and it also acts as a transition area between the city and the county. As such there is a need for the co-ordination of land uses and environmental improvements in this area.

It is submitted that these areas are not fringe areas. They are the next available sequential areas appropriate for the consolidation and sustainable development of Dublin City. These lands are currently viewed as lands divided by an administrative border, Fingal sees them as a transition area between the city and the county or as a Gateway to Fingal, whereas Dublin City sees them as strategic development and regeneration areas.

The nature of the Regional Planning Guidelines provision of zoned lands process draws the Town Planners attention or focus to established settlements within a County. Land around these settlements is rezoned in order to provide for the sustainable expansion of these settlements. This process has led to the expansion of settlements in Fingal such as Blanchardstown and Swords. Consequently, these settlements are at the top of the table of the hierarchy of settlements for the County.

However because a County’s targets for the provision of zoned land can be met by zoning land around existing settlements, priority is diverted from ‘fringe lands’. The ‘fringe lands’ in question are centrally located in Dublin’s Metropolitan area, they are well serviced by public transport, the road network and can link to existing water and wastewater infrastructure. In view of the above it is respectfully submitted that were these lands located within the Dublin City Council administrative area, they would be designated as a Key Development Area.

It is further contended that Fingal’s Settlement hierarchy should be amended to contain Dublin City (within the M50 ring) as a consolidated settlement at featuring at the top of the settlement hierarchy. This would give these lands the sequential priority that they merit in terms of the expansion of the Dublin City region.

Section 2.6 of the Draft Plan states:

The emphasis of this Plan is to continue to consolidate the existing zoned lands and to maximise the efficient use of existing and proposed infrastructure. In this way the Council can ensure an integrated land use and transport strategy in line with national and regional policy.

It is respectfully submitted that by ignoring the lands at Scribblestown and the wider area that the Council is not ‘maximising the efficient use of existing and proposed infrastructure’. It is further contended that Fingal County Council is ignoring its role in facilitating the sequential expansion of Dublin City, by favouring the expansion of outlying settlements over lands identified in the top tier of the Regional Planning Guidelines Settlement Hierarchy as a Gateway Core.

Section 2.6 further states:

Fingal has a significant quantum of land zoned to achieve the RPG targets. However, to be ready for any increased uptake and to account for constraints on some of the existing zoned lands, it is proposed to zone a strategic land bank at Lissenhall. This will ensure that Fingal is well placed to meet housing demand in a phased manner and to maximise the efficiencies of State investment in existing and proposed public transport infrastructure. The new zoning is located in the Metropolitan Area, ensuring that any further negative deviation from the RPG targets does not occur.

District	Land Bank Area	No. of housing units
Lissenhall	221 ha	7,000
Scribblestown	100 ha	10,000

The area of land proposed to be zoned residential at Lissenhall is 221 ha which would provide 7,000 housing units. Approximately 100 ha is available to be zoned residential at Scribblestown (approximately 40 hectares contained within

the subject lands) and assuming development at 100 units per hectare (on a par with the predicted densities in Pelletstown) achievable because of its close proximity to an operational commuter rail service, it could provide upto 10,000 housing units.

It is respectfully questioned as to why Fingal would favour the zoning of a land bank at Lissenhall which is substantially removed from the city centre over the lands at Scribblestown. This is not the first submission that has been made on these lands so the Planning Authority would have been aware of the potential for development at this location.

Notwithstanding that there is an objective to build the Metro North line which would have a terminus at Lissenhall, Scribblestown already benefits from an existing commuter line together with a planned station on the Metro West line which is planned for the long term. In view of the above, it is respectfully submitted that the lands at Scribblestown should be rezoned and developed prior to the lands at Lissenhall.

The selection of the lands at Scribblestown to be zoned as a strategic land bank would appear to make more sense for both Fingal County Council and Dublin City Council, in effect the Dublin City Region. They offer:

- Consolidation of serviced land
- Efficient use of existing and proposed infrastructure
- Proximity to public transport infrastructure
- Ability to facilitate the expansion of the compact city
- Existing amenity lands already in place to the south, Tolka Valley Park, and scope for creation of an amenity link to the north at the former Dunsink landfill.

7.1 Changes Sought to Draft Fingal County Development Plan 2017-2023

We respectfully seek the following amendments to the Draft Fingal County Development Plan:

- 1) Identification of the lands within the Settlement Hierarchy as:

Hierarchy	Description	Locations
Gateway Core	International business core and high density population, retail & cultural activities	Dublin City Centre & Immediate suburbs & north west Dublin city fringe
Metropolitan Consolidation Towns	Strong active urban places within metropolitan area with strong transport links	Swords, Blanchardstown, Lucan, Clondalkin, Tallaght, Dundrum, Dun Laoghaire, Bray

- 2) Consequential amendment of ‘Core Strategy Map’ to identify ‘city fringe’ lands
- 3) Zone subject lands RA ‘Residential Area’ in conjunction with an objective for a Masterplan / Local Area Plan
- 4) Amend Chapter 4 – Urban Fingal to include the requisite Masterplan / Local Area Plan
- 5) Due to the ‘strategic’ nature and location of the site consider an Strategic Development Zone (SDZ)

8.0 CONCLUSION

The Fingal Settlement Strategy is respectfully considered contrary to strategic policy set out in the Regional Planning Guidelines, the National Spatial Strategy and the emerging National Planning Framework. The lands at Scribblestown and other so called 'fringe lands' should be identified at the top tier of the Fingal County 'settlement strategy' as being within the Gateway Core of Dublin City. This step would elevate their priority for development over the settlements in the lower tiers and as would be better aligned with national and regional policy objectives.

The reason for this omission is thought to be largely due to the settlement centred expansion process advocated by the RPGs. Much of the focus of expansion in Fingal is centred on existing settlements located away from the County boundary. The consequence of this is that the excluded 'fringe areas' which are in fact part of the largest settlement in the region and therefore sequentially preferable for development which are not brought forward for development.

This outcome represents the inefficient use of existing and proposed infrastructure within Dublin City Region. It fails to support the policies of the Dublin City Development Plan which seeks to expand in a high density compact form and further rescinds the opportunity to work in tandem with an adjoining Local Authority to achieve a common objective in line with the strategic guidance of the Southern and Eastern Regional Assembly.

It needs to be recognised that the identified 'fringe areas' including the subject lands are part of 'Dublin City and its immediate suburbs' and are therefore part of the Gateway Core and are therefore at the top tier of the settlement hierarchy.

The strategic land bank identified at Lissenhall in the Draft Development Plan whilst respectfully merited in its designation is highly dependent on the completion of the Metro North rail line which is not yet in place and fails more significantly to focus planned and orderly development in a sequential manner in respect of Dublin's City Region status.

The lands at Scribblestown are already served by two modes of public transport and road networks and would support the NTA/DoECLG objectives of promoting high density residential development on strategic rail routes. Improvements are being made to water and wastewater infrastructure in the vicinity. They present a logical location for the development of high density residential development surrounded by high quality amenity land.

The current zoning of the lands for recreation and open space is unjustified firstly because the subject lands can be serviced and made ready for development and secondly because there is already a sufficient quantum of recreation and amenity space in the vicinity of the lands in this area. It is therefore submitted that there would not be a negative impact on recreation and amenity in the area if residential development was to take place there.

The adjoining *Key Development Area* of Pelletstown has limited remaining 'greenfield' sites to expand into over the coming six years. It is advocated that a Local Area Plan or Masterplan be prepared for the Scribblestown lands and wider area during the period of the Draft Development Plan in order that this area is ready for development during the next Development Plan period 2017-2023 and to meet strategic housing needs for the Dublin City Region and to confirm the 'compact city' approach. The close proximity of the lands at Pelletstown to the lands in Scribblestown presents the option of preparing a joint local area plan for the two areas.

The rezoning of these lands as residential would comply with regional and local policy set out in both the Fingal and Dublin City Development Plans to consolidate the development of the city within the existing urban footprint.

The recommended zoning of the subject lands can be justified on the holistic strategic regional needs of Dublin and as greater (and more important) than the maintenance and expansion of the existing settlement hierarchy of Fingal.

We therefore seek the appropriate consideration of the subject lands within the Draft Fingal Development Plan context and the requisite and consequent zoning objectives as should be required and afforded to same.

Mark Brindley
Principal - The Planning Partnership

