

TOWN PLANNING SUBMISSION



DRAFT FINGAL COUNTY DEVELOPMENT PLAN 2023-2029

Lands within Kilbarrack Industrial Estate,
South of the Railway Line,
Kilbarrack,
Co. Dublin

May 2022

Submitted on behalf of:
Murdock Builders Merchants (Ireland) Ltd.,
Kilbarrack Industrial Estate,
Kilbarrack,
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Executive Summary

- This submission is made by Hughes Planning and Development Consultants, on behalf of our clients Murdock Builders Merchants (Ireland) Limited and is submitted to Fingal County Council in respect of the Draft Fingal Development Plan 2023-2029, which is currently on public display, up until 12th May 2022.
- Our clients' landholding currently extends to an area of approximately 0.63 Hectares (c. 1.56 acres) and comprises an operational Murdock's Builders Merchants unit with associated parking and service space. These lands form part of the wider submission lands which extend to a total of c. 7.5 Hectares. The lands are located to the immediate east of the outer Dublin city area on the southern side of the Howth-Sutton railway line.. Under the current Fingal Development Plan 2017-2023 and the Draft Fingal Development Plan 2023-2029, the subject lands are zoned 'GE' – *General Employment*, the objective of which is to 'Provide opportunities for general enterprise and employment'
- The lands have the benefit of direct pedestrian access to the Howth Junction and Donaghmede train station which adjoin the western boundary of the submission lands and are a maximum distance of 400m from the submission lands, this is in addition to the numerous bus services which current operate along the adjacent Kilbarrack Road, making the site an ideal location for redevelopment to provide for a high density residential/mixed-use scheme.
- It must also be noted that the works to the nearby Howth Junction and Donaghmede Stations and the associated upgrades will increase capacity of the northern line, allowing a greater number of DART services, further increasing accessibility to and from the area. Thus, our clients are actively exploring alternative land uses which are more suitable at the location which avail of the high quality public transport network.
- The submission lands are well located in proximity to existing local services infrastructure and are extremely well served by existing public transport, have the benefit of high quality road connectivity, and are suitable candidate for Tier 1 zoned residential lands which should, we consider, be developed as a priority over the lifetime of the upcoming Draft Fingal Development Plan 2023-2029. The redevelopment of the lands for residential and mixed-uses would support the compact and sustainable growth of the Dublin city consolidation area.
- On the basis of the above, and in support of National and Regional Planning policy, which support the redevelopment of brownfield lands and the intensification of development within close proximity to quality public transport corridors, that the submission lands, including our client's lands are rezoned for development over the plan period.
- In support of the above, as part of the Draft Plan, our clients are seeking to have the lands both within their ownership and within the wider industrial estate, rezoned from 'GE' – *General Employment*, to 'RA' – *Residential Area*,
- The following map extracts appropriately depicts our clients' request.



Figure 1.0 Extracts from the Fingal Development Plan 2017-2023 (Sheet 10)(left) and the Draft Fingal Development Plan 2023-2029 (Sheet 10)(right) showing the submission lands outlined in red located on 'GE' zoned lands. The lands are accessible from the surrounding existing road network, are serviceable and readily available for development. Lands within our clients' ownership are outlined in black.



Figure 2.0 Extract from the Zoning Map (Map 10) from the Draft Fingal Development Plan 2023-2029 showing the submission lands, subject to the requested zoning amendment.

- As part of the Draft Development Plan Core Strategy, it is evident that just **c. 31%** of the overall residential yield for Fingal has been designated to the *Dublin City and Suburbs Consolidation Area*, which is substantially below the stated requirements as included within the National Planning Framework, and in particular, does not align with the requirements of National Policy Objective 3b which states that **at least 50% of all new homes should be delivered within the built-up footprints of the five major cities and suburbs.**

- Upon review of the Core Strategy figures provided as part of the Draft Fingal Development Plan 2023-2029, it would appear that there is a disparity between the population growth anticipated and the potential residential yield of available lands within the Dublin City and Suburbs Consolidation Area. In this regard, we believe that further strategic zonings are required to meet the projected growth levels to 2029.
- Having regard to the above, we are of the strong opinion that a greater proportion of housing growth should be allocated to the consolidation area and in turn the Planning Authority needs to consider further strategic rezoning through consolidated growth of existing built-up areas.
- Our clients consider that the provision of a high-quality residential development, comprising varying unit types and sizes to serve the growing population of Dublin City and its suburbs, would represent the optimal and most efficient use of the submission lands.
- The proposed zoning of additional residentially zoned lands will aid in sustaining essential services in the area and is considered to be fully in accordance with the policies and objectives of the Development Plan and other relevant National and Regional Planning Policy which seek the increased consolidation and compact growth of existing built-up areas.

1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2 have been instructed by our client, Murdock Builders Merchants (Ireland) Limited to make a submission on the proposed Draft Fingal Development Plan 2023-2029, with respect to the existing Kilbarrack Industrial Estate located south of the railway line, which includes lands under our clients' ownership Murdock's Building Merchants, Kilbarrack Industrial Estate, Kilbarrack, Co. Dublin.

The existing MBM Kilbarrack premises extends to an area of approximately 0.63 Hectares (c. 1.56 acres) and comprises the unit and associated car storage space- and serving area. The site is located on the western side of Kilbarrack Parade, just north of its junction with Kilbarrack Road. The Howth Junction and Donaghmede train stations are located further west and north of the site, within walking distance. The immediate area surrounding the subject lands is characterised by commercial, residential and industrial land-uses, with the existing Murdock Builders Merchants premises located within the southern extent of the industrial estate. The remainder of the submission lands which is outside of our clients' ownership is under the ownership of multiple landowners and provides a wide variety of uses. A majority of the units have access points from the main road network.

As per the provisions of the current Fingal Development Plan 2017-2023 and the recently published Draft Fingal Development Plan 2023-2029, the submission site is subject to the 'GE' – General Employment land-use zoning, the primary objective of which is to *'Provide opportunities for general enterprise and employment.'* It is prudent to note from the outset, that immediate area surrounding the submission lands and the existing road network are earmarked for future upgrades with the northern line set to undergo improvement works and extension of the DART to Balbriggan. These upgrades will further improve the accessibility of the lands, making it an enviable location for residential location. There may also be impacts on the current operation of our client's establishment at this location, presenting a degree of uncertainty to the company in terms of the medium to long-term plans for the operation, efficiency and growth on the site.

On the basis of the above and given the enhanced accessibility which will be available to the site on account of the forthcoming DART upgrades, it is considered that the subject lands present a unique opportunity for to facilitate the continued and compact growth of Dublin City and its suburbs, having the potential and capacity to deliver a high quality, high-density residential scheme, within close proximity to a high-capacity, high-frequency public transport corridor. It is considered that the redevelopment of the site for residential purposes would aid in meeting the key objectives of national and regional policy which seek to prioritise the provision of housing at locations which are well served by existing facilities and existing and planned public transport.

Having regard to the above, this submission requests that the Planning Authority consider rezoning the subject to allow for the provision of residential land uses, providing affordable homes and new communities to serve the Dublin City Consolidation Area. This submission highlights that the Dublin City and Suburbs consolidation area is set to experience a population growth of c. 24.4% to the year 2029. This is a significant growth target and will necessitate a significant increase in housing output over the plan period. The continued growth of Dublin City and its Suburbs will put pressure on the existing proportion of residential and mixed-use zoned lands, many of which have been subject to residential development over the period of the current Fingal County Development Plan 2017-2023. This is a significant growth target and will necessitate a significant increase in housing output over the plan period.

It is considered that the addition of residentially zoned lands in this area would facilitate the development of new and affordable homes and community services in the Dublin City Consolidation Area in accordance with the National Planning Framework and the Regional Spatial and Economic Strategy for the Eastern and Midlands Region.

This submission is made in response to a public notice dated 24th February 2022, inviting specific policy submissions or observations regarding the contents of the Draft Fingal Development Plan 2023-2029, up until 12th May 2022. In summary, this submission requests that Fingal County Council considers the following ahead of the adoption of the upcoming development plan:

- *We would request that the Planning Authority considers rezoning the submission lands from 'GE' General Employment' to 'RA-Residential Area', the objective of which is to 'Provide for new residential communities subject to the provision of the necessary social and physical infrastructure.';*

The rationale for the afore referenced request will be set out in detail in the proceeding sections of this report. We request that the recommendations of this submission be given full consideration in the preparation of the forthcoming Fingal Development Plan 2023-2029.

2.0 Submission Lands

This submission relates to approximately 7.5 Hectares (c. 18.5 acres) of industrial lands located at Kilbarrack, south of the railway line. The lands are bound to the north and west by rail and to the east and south by residential land uses. There are a variety of business operating within the submission lands. Our client owns approximately 0.63 Hectares (c. 1.56 acres) of land located on the eastern side of Kilbarrack Parade, c. 150 metres north from the junction with the R104. The subject lands are currently home to a Murdocks Builders Merchants, and operated by our clients.

The lands are highly accessibly and, benefit from road frontage along the Kilbarrack Parade, Kilbarrack Road and other internal roads which serve the industrial units. Vehicular access is provided to each unit.

Kilbarrack is located approximately 1.2km north of the submission lands which contains a large and growing population and workforce. Access to the submission lands from Kilbarrack is a short 4 minute drive or a 6 minute cycle. Baldoyle, Donaghmede and Raheny are also located within similar distance, further increasing potential workers.

The images displayed overleaf outline our clients' submission lands boundary in the context of its immediate and wider location.



Figure 3.0 Aerial image of the submission lands, red outline, in their immediate context.



Figure 4.0 Aerial image of the submission lands, black outline, in the context of surrounding zoning objectives in the area. The lands are zoned 'GE' and adjoin 'GE' lands, 'OS' lands and 'RS' lands. 'Z1' zoned lands (Residential) are also located in proximity to the lands.

The neighbouring lands to the immediate north of the submission lands are a continuation of the industrial park with a range of services being provided. To the south, the lands adjoin Naomh Barróg GAA Club. To the east, the lands adjoin an established and mature residential area, demonstrating the liveability of the area.

In considering the more recent national and regional policy focus on delivering compact and sustainable growth in areas which are proximate to public transport corridors, it is considered that the present use of the lands for commercial premises represents an underutilisation of primely located serviced lands which have the capacity to accommodate a portion of Dublin's future population growth and to deliver the much needed additional residential units over the coming years.



Figure 5.0 Aerial image indicating the submission lands in the context of its wider environment.



Figure 6.0 Aerial view of our clients' property within the submission lands showing its surrounding context.



Figure 7.0 Street view image of the existing access from Kilbarrack Parade to our clients' lands.

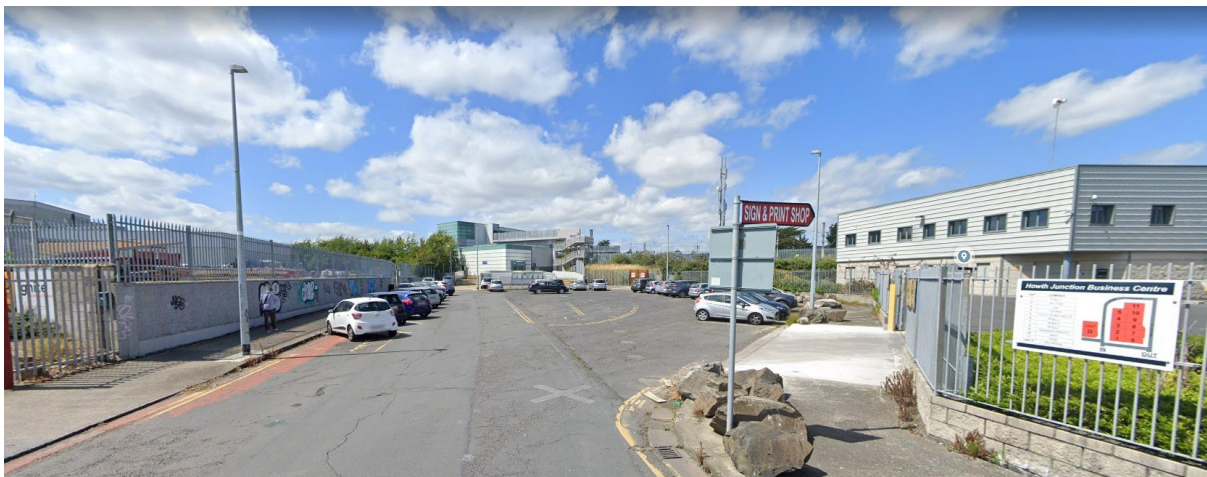


Figure 8.0 Access to the train station from within the submission lands.

In terms of the site's wider locational context, it is noted that the lands are situated approximately 600 metres north of Raheny village, which provides for a number of services and facilities, including a supermarket, dentist, café, take-away, pharmacy, hairdressers and other essential and non-essential services. Dublin City Centre is located approximately 8km southwest of the submission lands.

With regards to public transport there are numerous serviced bus stops and train stations within walking distance from the submission lands. The Howth Junction and Donaghmede train station is located within a 300m (3-minute walk) distance of the submission lands which services the Dublin-Dundalk commuter line and the DART commuter line. The lands area also proximate to the Bayside and Kilbarrack train stations. It is clear that the site is well served by existing road and public transport infrastructure, is within easy reach of Dublin City Centre and the neighbouring key metropolitan town of Blanchardstown, making it an ideal location for the provision of addition residential/mixed-use development.

It is submitted that this significant landbank represents a body of high capacity and potential lands which, through appropriate rezoning and pro-active plan-led guidance, can be designed to accommodate a significant quantum of residential development, in line with the aims and objectives set down in both the Project Ireland 2040 National Planning Framework and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly.

3.0 Planning History

This section provides an overview of the planning history for the subject landholding as well as planning precedents for medium and larger scale residential and commercial developments within the immediate area surrounding the subject lands.

3.1 Subject Site

A review of the Fingal County Council planning register found the following planning permissions relating to our clients' lands. The details of these applications are outlined in the table overleaf:

Planning History of Murdock Building Merchants, Kilbarrack Industrial Estate, Kilbarrack, Co. Dublin		
Reference No.	Description	Decision
Reg. Ref. F19A/0556	<i>Alterations to a previously approved permission (Reg. Ref. F17A/0630 / An Bord Pleanála Ref. No. APB-302007-18). The proposed alterations comprise (i) revised external storage yard layout to provide for omission of 1 no. previously approved storage rack (Rack Type 3) as per Reg. Ref. F19A/0181 and the extension of approved Rack Type 1, located along the southern site boundary from 78.09m to a maximum length of 85.316m; (ii) provision of a new staff car parking area (12 no. vehicular parking spaces), separated from the main yard by an internal barrier formed by acoustic fencing and separated from the eastern site boundary by additional acoustic fencing, landscaping and tree planting; (iii) provision of landscaping and tree planting along the western site boundary; and, (iv) all ancillary site works necessary to facilitate the development. The proposal also seeks an amendment to the approved hours of operation from 7.30am to 5.30pm, Monday to Friday and between 8.00am and 1pm on Saturday, (No Sunday opening is proposed).</i>	Planning permission granted by Fingal County Council on 25 th February 2021.
Reg. Ref. F19A/0181	<i>Alterations to a previously approved permission (Reg. Ref. F17A/0630/ An Bord Pleanála Ref. No. ABP-302007-18). The proposed alterations comprise (i) amendment of the approved hours of operation from 7.30am to 5.30pm Monday to Friday and between 8.00am and 1pm on Saturday as follows:- 7.00am to 5.30pm Monday to Friday and between 8.00am and 1pm on Saturday (No Sunday opening is proposed); (ii) revised external storage yard layout to provide for omission of 2 no. previously approved storage racks (Rack Type 1 as per Reg. Ref. F17A/0630/An Bord Pleanála Ref. No. ABP-302007-18) and the provision of 1 no. 4.2m high storage racks (Rack Type 1) to be located along the southern site boundary and 1 no. 3m. high storage rack (Rack Type 3) to be located along the southern site boundary within the eastern section of the yard (13m from the eastern site boundary with Alden Road); (iii) No alterations are proposed to the 2 no. previously approved 3.618m high storage racks located adjacent to the approved builder's merchants building (Rack Type 2 as per Reg. Ref. F17A/0630/ An Bord Pleanála Ref. No. ABP-302007-18) and (iv) The reconfigured yard includes a dedicated gravel, sand and steel mesh storage area and a dedicated field drain/pipe storage area (both separated from the main yard by an internal barrier formed by removal bollards and chain). Access is not proposed to these areas prior to 7.30 am. No vehicular access is proposed to the dedicated field drain/pipe storage area. the yard also includes circulation routes, loading and marshalling areas and perimeter landscaping.</i>	Planning permission granted by Fingal County Council on 29 th June 2019.
Reg. Ref. F17A/0630	<i>Retention Permission sought for alterations to previously approved builders merchant yard (Reg. Ref. F16A/0529 & Ref No. PL06F.248034) which include: (i) use of rear yard for external storage of building materials and goods associated with approved builders merchants use; (ii) omission of approved car parking area (30 no. spaces associated circulation area) adjacent to eastern site boundary (with Alden Road/Verbena Lawn) and provision of 3 no. metal racking storage units (4.54m in height) accessible by Murdock's builders merchant staff only; (iii) provision of 2 no. metal racking storage units (3.6m in height) adjacent to southern elevation of existing building; (iv) alterations of</i>	Retention permission and full permission granted by Fingal County Council on 11 th June 2018 and by An Bord Pleanála on 29 th January 2019.

	<i>Condition No. 6 of Reg. Ref. F16A/0529 & Ref. No. PL06F.248034 to provide for revised opening hours of 7.00am to 6.00pm on weekdays and 8.00am to 1.00pm on Saturday and (v) reconfiguration of approved surface car park at front of site (facing Kilbarrack Parade) to provide 25 no. on-site car parking spaces. Permission is also sought for (i) provision of supplementary screen landscaping along full extent of eastern site boundary (with Alden Road and Verbena Lawn); (ii) alterations to loading/service yard layout to delineate dedicated loading bays adjacent to existing building; and, (iii) all associated site development works necessary to facilitate the development.</i>	
Reg. Ref. F16A/0529	<i>(i) The change of use of an existing light industrial building to provide a builder merchants use; (ii) internal alterations including provision of stock display area with ancillary offices and staff facilities; (iii) external alterations consisting of repair and refurbishment of all elevations, including removal of windows, introduction of new windows, the removal of 3 no. roller shutters and the introduction of 2 no. new roller shutters; (iv) reconfiguration of existing surface car park (currently providing 50 no. spaces) to provide for 38 no. spaces including loading area; (v) building signage front/western elevation; (vi) 2 no. 4.4m high totem advertising signs to front/north-western corner of the site and; (vii) all associated site development/landscaping and SUDS drainage works necessary to facilitate the development.</i>	Planning permission granted by Fingal County Council on 23 rd January 2017 and By An Bord Pleanála on 20 th July 2017.
Reg. Ref. F05A/0329	<i>The widening of the existing vehicular access to the site and erection of new automated sliding entrance gate off Kilbarrack Parade, increase width and height of an existing sectional door opening and installation of a new sectional door to the front of the existing building and reconfiguration of vehicular parking.</i>	Planning permission granted by Fingal County Council on 15 th June 2005.

Table 1.0 Planning history associated with the submission lands.

The location of the submission site is ideally located to facilitate the compact and sustainable growth of the Dublin City Consolidation Area, being situated in an area which benefits from existing and planning public transport, existing and improved road infrastructure, whilst also benefitting from the service infrastructure that is in place to support surrounding approved developments. The delivery of the BusConnects and DART West Programmes will also allow for a greater degree of accessibility and connectivity between the submission lands and the wider environs, making it an optimal location for residential development. Given the proximity of the subject lands to the Howth Junction and Donaghmede Train Station (3-minute walking distance) it is contended that the redevelopment of the subject lands for residential and mixed uses will wholly support the principles of public transport orientated development and compact growth.

4.0 National and Regional Planning Policy Context

This section of the submission will examine the relevant regional and national planning frameworks that inform the use and development of the submission lands. Documents of note include the Regional Spatial and Economic Strategy for the Eastern and Midland Regions 2019-2031, The National Planning Framework (NPF) and the more recently published Housing For All – A New Housing Plan for Ireland. Each of the aforementioned documents will be discussed in turn in the proceeding sections of this report.

4.1 Project Ireland 2040 – National Planning Framework

Published in 2018, Project Ireland 2040 – The National Planning Framework is the Irish government's overarching policy initiative which sets a vision and a credible development strategy to shape the country's national, regional and local spatial development in economic, environmental and social terms to 2040. The plan sets out ten National Strategic Outcomes (NSO's) which underpin the overarching vision for the country and serve as shared goals, as depicted in the below extract.



Figure 8.0 National Planning Framework and its National Strategic Outcomes and Priorities of the National Development Plan

The National Planning Framework is focused on the compact development of existing urban areas to promote sustainable growth and allow for the increased viability of central services, shops and public transport in conjunction with the regeneration of existing built-up areas as opposed to the continual expansion and sprawl of cities and towns into the countryside at the expense of smaller villages. The NPF seeks to manage growth within the three regions of Ireland, which include the Northern and Western, Southern, and Eastern and Midland Regional Assembly areas, to allow for balanced growth and guided development. The following target is outlined in relation to national growth:

*'We have five cities in Ireland today in terms of population size (>50,000 people): Dublin, Cork, Limerick, Galway and Waterford. In our plan we are targeting these five cities for **50% of overall***

national growth between them, with Ireland's large and smaller towns, villages and rural areas accommodating the other 50% of growth.'

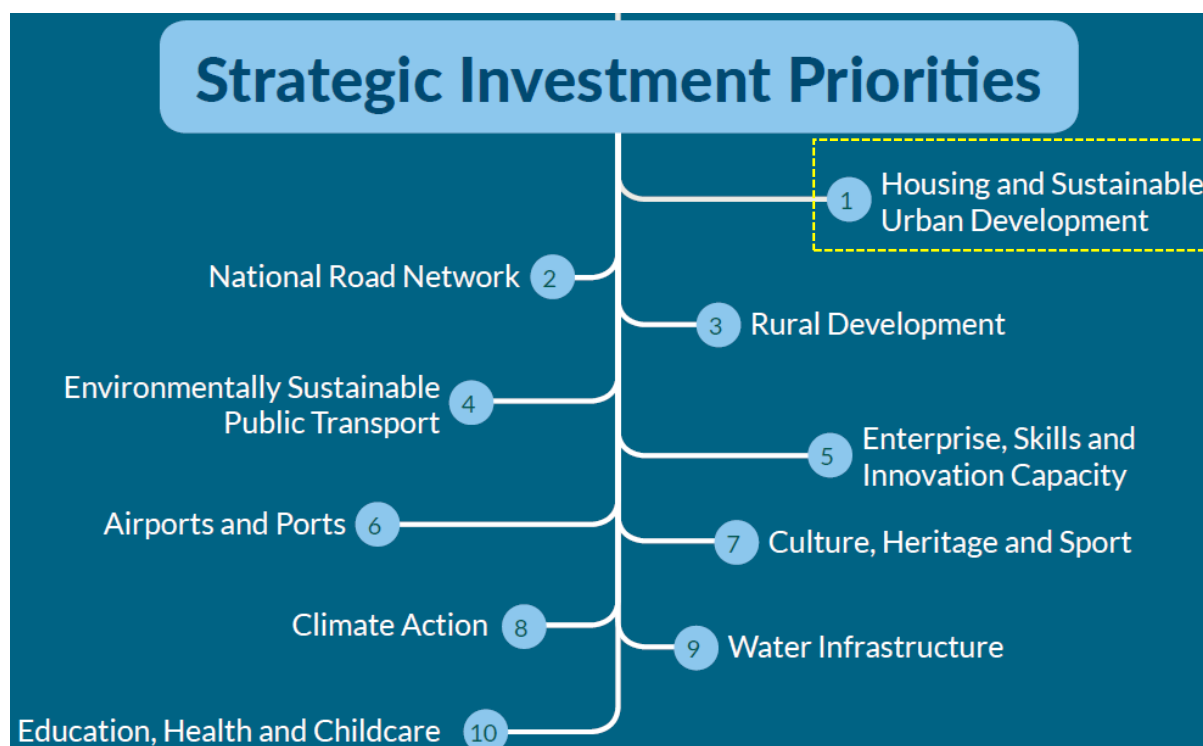


Figure 9.0 National Strategic Investment Priorities of the National Development Plan..

National Policy Objective	Eastern and Midland	Southern	Northern and Western
1. Growing Our Regions	+ 490,000 - 540,000 people (2.85m total) +320,000 in employment (1.34m total)	+ 340,000 - 380,000 people (2m total) +225,000 in employment (880,000 total)	+160,000 - 180,000 people (1m total) +115,000 in employment (450,000 total)
2. Building Stronger Regions: Accessible Centres of Scale ²⁰	Dublin City and Suburbs: +235,000 - 290,000 people (at least 1.41 million total) Regional Spatial and Economic Strategy to set out a strategic development framework for the Region, leading with the key role of Athlone in the Midlands and the Drogheda-Dundalk-Newry cross-border network	Cork City and Suburbs: +105,000 - 125,000 people (at least 315,000 total) Limerick City and Suburbs: +50,000 - 55,000 people (at least 145,000 total) Waterford City and Suburbs: +30,000 - 35,000 people (at least 85,000 total) Regional Spatial and Economic Strategy to set out a strategic development framework for the Region	Galway City and Suburbs: +40,000 - 45,000 people (at least 120,000 total) RSES to set out a strategic development framework for the Region, leading with the key role of Sligo in the North-West, Athlone in the Midlands and the Letterkenny-Derry cross-border network
3. Compact, Smart, Sustainable Growth	50% of new city housing within existing Dublin City and suburbs footprint 30% all new housing elsewhere, within existing urban footprints	50% new city housing on within existing Cork, Limerick and Waterford Cities and Suburbs footprints 30% all new housing elsewhere, within existing urban footprints	50% of new city housing within existing Galway City and suburbs footprint 30% all new housing elsewhere, within existing urban footprints

Figure 10.0 National Planning Framework Targeted Pattern of Growth, 2040.

The above table provides a summary of the key national targets for structuring the overall national growth anticipated, promoting regional parity, creating accessible centres of scale and securing compact and sustainable growth. The clear policy direction at a national scale is to grow our regions and accommodate new housing within or adjacent to existing built-up areas. It must be acknowledged that in order to accommodate the population growth envisaged by the National Planning Framework, that there is a requirement for an increased output of a mix of residential units over the coming years, up to 2040 to meet a growing demand.

With regards to managing growth, Section 1.2 of the National Planning Framework sets out that more balanced growth also means more concentrated growth and that the key five cities of **Dublin**, Cork, Limerick, Galway and Waterford are targeted for **50% of overall national growth** between them, with Ireland's large and smaller towns, villages and rural areas accommodating the other 50% of growth. In addition, National Strategic Outcome No. 1 '*Compact Growth*', provides that the NPF is focused on the careful management of the sustainable growth of compact **cities, towns and villages** in order to add value and create more attractive places in which people can live and work. To achieve this outcome, there must be an increase in the proportion of more compact forms of growth in the development of settlements of all sizes, from the largest city to the smallest village.

More specifically, strategies included in Chapter 2.2 of the Planning Framework seeks to target a greater proportion (40%) of future housing development to be within and close to the existing '**footprint of built-up areas**'. This target is to be achieved by making better use of under-utilised land and buildings, including 'infill', 'brownfield' and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport. A key element of national growth is the more efficient use of underutilized sites within existing built-up areas, as per the following commentary from Project Ireland 2040 document:

*'A major new policy emphasis on renewing and developing existing settlements will be required, rather than continual expansion and sprawl of cities and towns out into the countryside, at the expense of town centres and smaller villages. **The target is for at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites.** The rest of our homes will continue to be delivered at the edge of settlements and in rural areas'.*

As the submission lands currently are situated on a piece of land currently under-utilised, given its proximity to a wide range of facilities and amenities, with the potential for new residential development and in considering its proximity to a range of high-capacity, high-frequency public transport services, it is submitted that the site has the potential to realise the goals and objectives as set out in the National Planning Framework (2018) by accommodating higher density development.

A number of objectives outlined in Appendix 1 of the National Planning Framework have been identified to ensure proper planning and sustainable development. The following national policy objectives are considered to be of relevance:

- | | |
|-------------------------------------|--|
| National Policy Objective 3a | <i>Deliver at least 40% of all new homes nationally, within the built up footprint of existing settlements.</i> |
| National Policy Objective 3b | <i>Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.</i> |
| National Policy Objective 4 | <i>Ensure the creation of attractive, liveable, well designed, high-quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.</i> |
| National Policy Objective 5 | <i>Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.</i> |
| National Policy Objective 6 | <i>Regenerate and rejuvenate cities, towns and villages of all types and scales as environmental assets, that can</i> |

accommodate changing roles and functions, increased residential population and employment activity and enhanced levels of amenity and design quality, in order to sustainably influence and support their surrounding area.

National Policy Objective 11 *In meeting urban development requirements there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.*

National Policy Objective 33 *Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location*

National Policy Objective 35 *Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.*

In light of the above, it is considered that the subject lands present an ideal location for development in line with the objectives of the NPF as listed above. The provision of a high density residential development on the subject lands, is in accordance with the NPF's target of 40% of new housing to be located within existing towns and settlements and for 50% of population growth to take place within Ireland's large and smaller towns and villages.

It is also noted in Section 4.5 it is noted that there are many areas in our cities, towns and villages that contain lands and buildings not developed or used to their full potential. It is considered that the submission lands represent such lands, which have the potential to accommodate a proportion of future growth and activate the significant potential of the existing suburb of Ashtown. The submission lands are in a location that would benefit directly from the already proposed infrastructural works which are part complete and part under construction, such as improved and new road infrastructure, new Quality Bus Corridor, cycling infrastructure, whilst also benefitting from the services infrastructure that will be in place to support residential development, such as foul water, mains water and energy connections, supporting economies of scale in terms of shared resources.

The NPF sets out the following key future growth enablers for Dublin within the framework document which are considered to be of particular relevance to this submission:

- *Delivering the key rail projects set out in the Transport Strategy for the Greater Dublin Area including Metro Link, DART expansion and the Luas green line link to Metro Link; and*
- *The development of an improved bus-based system, with better orbital connectivity and integration with other transport networks;*
- *Relocating less intensive uses outside the M50 ring in particular and from the existing built-up area generally;*

Having regard to the location of the submission lands, within a short walking distance of the Howth Junction and Donaghmede Train Station, a high quality public transport network, and a wide variety of services and amenities in abundance, it is strongly contended that the submission lands present a unique opportunity for the planned and compact growth of the existing built-up footprint of Dublin's suburbs, directing development to an area which benefits from strong physical and social infrastructure, extensive employment bases and opportunities and has the capacity to accommodate significant housing growth.

The National Planning Framework provides the following commentary in relation to development within Dublin City and its associated metropolitan area:

‘Dublin needs to accommodate a greater proportion of the growth it generates within its metropolitan boundaries and to offer improved housing choice, transport mobility and quality of life. Dublin also needs to become a greener, more environmentally sustainable city in line with international competitors.

The subject lands have significant redevelopment potential which, through appropriate rezoning and pro-active plan-led guidance, can be designed to accommodate a significant quantum of residential development. The location of the lands within a 3-minute walking distance from a train station presents direct means of foregoing the short-term and piecemeal development of lands on the edge of existing centres. The future development of Fingal relies on strengthening the integration between high quality, high-capacity public transport routes and housing growth. It is essential that future development occurs in locations which are within or proximate to the Metropolitan area and well served by public transport links and recreational and social amenities, such as the submission lands.

4.2 National Development Plan 2018-2027 (as revised 2021-2030)

The National Development Plan 2018—2027, and as subsequently revised, sets out the investment priorities that will underpin the successful implementation of the National Planning Framework, including the development of the necessary housing stock set out therein. The National Development Plan demonstrates the Government’s commitment to meeting Ireland’s infrastructure and investment needs over the next ten years, through a total investment estimated at €116 billion over the period, in high quality integrated public and sustainable transport systems. This includes investment in high quality integrated public and sustainable transport systems as well as health and education.

Identified in section 1.6 ‘*Housing Challenge*’ the National Development Plan outlines that need for housing developments to ensure adequate housing stock for the country’s predicted population growth which is expected to be nearly 6 million by 2040 requiring an additional 550,000 homes.

‘The need to provide in excess of half-a-million more homes over the period to 2040 corresponds to a long-term trend of 25,000 new homes every year.’

In line with the National Development Plan, development at the subject site can increase the housing stock that is deemed as necessary in the plan, helping to support the growing population of Dublin and its suburbs and the subsequent demand for housing. The proposed sustainable redevelopment of the submission lands is considered to reflect the type of sustainable development which is sought throughout national policy in regard to the appropriate development of underutilised sites. Moreover, the area surrounding the submission lands is set to benefit directly from future investment in public transport, with the adjacent improvement works at the nearby Howth Junction and Donaghmede train station. This expansion programme will improve the existing rail system, increasing carrying capacity and of the service. This, in turn, will support existing and future development within proximity to rail stations.

4.3 Housing for All – A New Housing Plan for Ireland

The ‘Housing for All - A new Housing Plan for Ireland’ was published in September 2021 as part of the Irish Government’s ‘Our Shared Future’ programme which, in turn, sets out the Government’s mission to tackle the housing crisis. The objective of the plan is to ensure that everybody has ‘*access to sustainable, good quality housing to purchase or rent at an affordable price, built to a high standard, and located close to essential services, offering high quality of life.*’ The plan seeks to increase new housing supply to an average of at least **33,000 new units per year** with specific pathways outlined to achieve the four overarching objectives of the plan which are:

- *Supporting Homeownership and Increasing Affordability;*
- *Eradicating Homelessness, **Increasing Social Housing Delivery** and Supporting Social Inclusion;*
- ***Increasing New Housing Supply; and***
- *Addressing Vacancy and Efficient Use of Existing Stock.*

Each of the pathways comprises a comprehensive suite of actions to achieve the above referenced Housing Policy Objectives. These pathways are illustrated in the extract on the following figure:



Figure 11.0 Figure indicating the four pathways to Housing for All

Pathway No. 3 '*Increasing New Housing Supply*' stipulates a number of key aspects to providing for new homes, each of which are depicted in the extract overleaf. It is also noted within that by 2040, an additional one million people will be residing in Ireland. The state is acting decisively to activate supply across both public and private lands, which is critical to ensuring that new homes to be built over the next decade are located where housing demand is greatest and where there is good accessibility to employment, education, public transport, and other services and amenities. In this context Section 3.1 of the Plan '*Increase Land Availability for Residential Development*' states that '**a steady supply of suitable and serviced zoned land is needed**' further providing that '*Local Authorities and elected members play a key role in zoning enough land to meet residential housing requirements, while also respecting the requirements for balanced regional development and the need to prevent urban sprawl.*'

It is noteworthy, that the plan also goes on to note that '*It may be necessary for a **Local Authority to zone more serviced land in a development plan than would equate to meeting precisely the projected housing demand for that settlement, to provide choice in sites locally and to avoid restricting the supply of new housing development through inactivity on a particular landholding.***' In this context, it is considered that the zoning request, subject to this submission proposes a plausible provision of additional residentially zoned lands which will allow for the development of a high-quality residential scheme, which integrates with its wider surrounds, and will aid in meeting the residential output requirements as set out within the new *Housing for All* plan.



Figure 12.0 Pathway to Increasing New Housing Supply, as contained within the Housing For All plan.

It is submitted that the proposed rezoning is consistent with the above policy as it facilitates the provision of an appropriate quantum of residential accommodation on a serviced site which is within easy reach of essential services and amenities, whilst being served by a high public transport network. The provision of residential units on site, supports homeownership and affordability, will result in increased social housing provision and will provide for the efficient use of well-located lands, which have capacity to comfortably absorb additional development. The proposed zoning amendment responds to a recognised need, at national level, for residential accommodation and for the growth of our smaller towns and villages in a compact and sustainable manner. The proposal is consistent with policy in this regard. Moreover, the additional provision of residentially zoned lands at this location, will provide for residential development on lands that are contiguous to the existing built-up area of Dublin City and its suburbs and will aid in realising the key national policy objectives set out hereunder.

4.4 Regional Spatial and Economic Strategy (2019-2031)

The Regional Spatial and Economic Strategy for the Eastern and Midland Region (RSES) was published in 2019. A Regional Spatial & Economic Strategy (RSES) is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. At this strategic level it provides a framework for investment to better manage spatial planning and economic development throughout the Region. The principal statutory purpose of the RSES is to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Regions.

At the core of the RSES is the consideration of a settlement hierarchy for the Region, which outlines the key locations for population and employment growth, coupled with investment in infrastructure and services to meet those growth needs. The RSES build on the foundations of Government policy in Project Ireland 2040 and replaces the current Regional Planning Guidelines (RPGs). One of the key objectives for the Growth Strategy for the Eastern and Midland Region, as per the RSES is to:

‘Deliver sustainable growth of the Metropolitan Area through the Dublin Metropolitan Area Strategic Plan (MASP)’

As indicated in the below map extract, Kilbarrack is located within the ‘Dublin City and Suburbs’ area which was home almost to 1.2 million people in 2016, and accounts for approximately half of the Region’s population or a quarter of the national population, as well as being the largest economic contributor in the state. The Metropolitan Area Strategic Plan (MASP) as included in Chapter 5 of the RSES sets out a strategy to achieve 1.4 million people in Dublin City and suburbs by 2031 through the delivery of large-scale strategic development areas.



Figure 13.0 Map extract from the RSES indicating the location of Ashtown within the Metropolitan Area.

The RSES confirms that local authorities, in developing their core strategies and settlement hierarchies will consider the following growth enablers for every part of the Region to meet its potential including:

‘Compact Sustainable Growth – Promote compact, sequential and sustainable development of urban areas from large to small to realise targets of **at least 50% of all new homes** to be built, to be within or contiguous to the existing built up area of Dublin city and suburbs, and a target of **at least 30% for other urban areas.**’

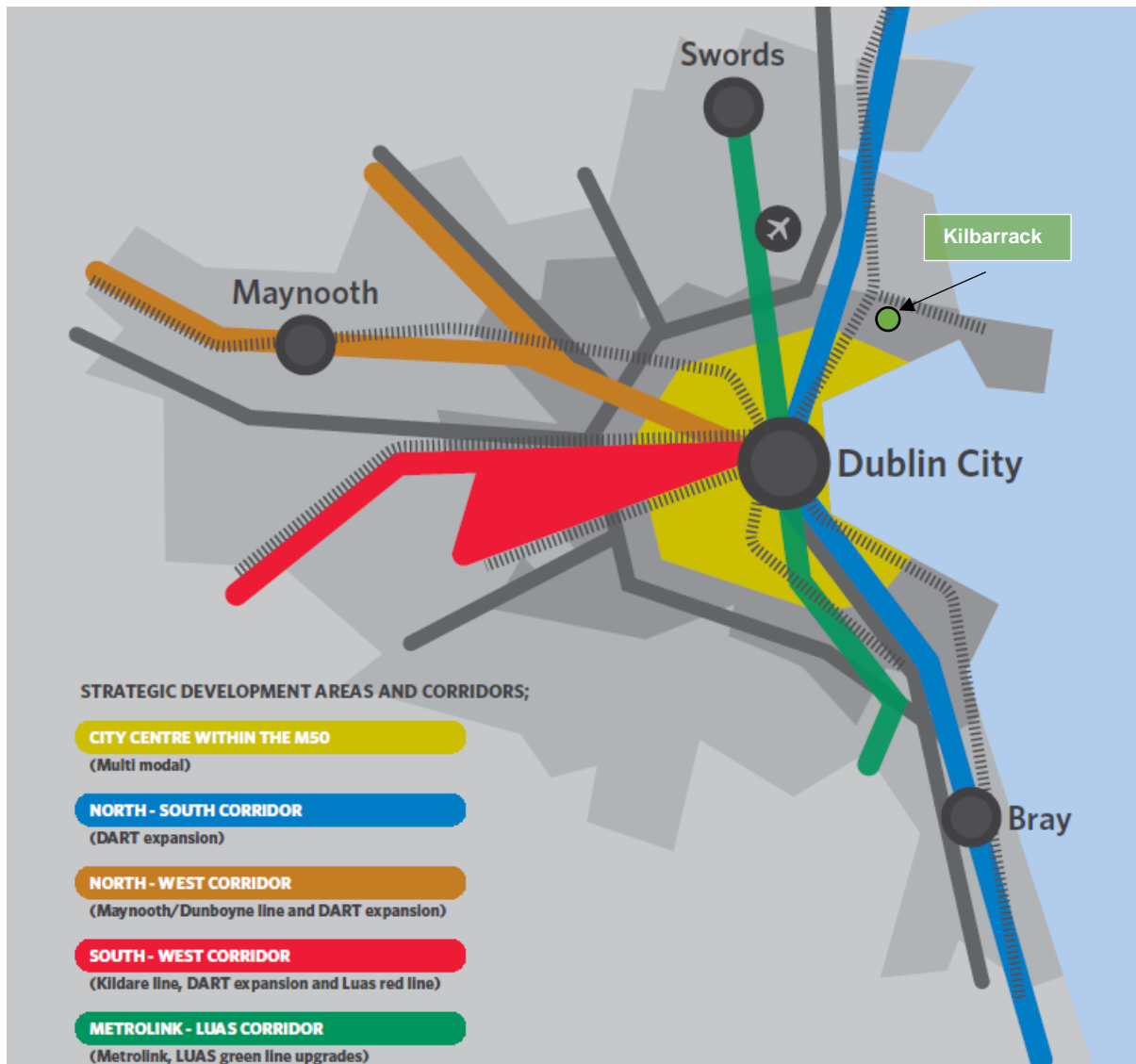


Figure 14.0 Map extract from the RSES showing the various transport corridors proposed under the plan. The subject lands are located within close proximity to the proposed DART expansion and are also located along an existing rail-line.

As indicated in the above map extract, the submission lands are located along an existing rail line and just east of the 'Emerging preferred Route' for the North-South Corridor expansion Line extension, which will create improved public transport connection to the north as far as Balbriggan. Furthermore, the site sits immediately adjacent to the Howth Junction and Donaghmede stations which provide frequent commuter and DART services.

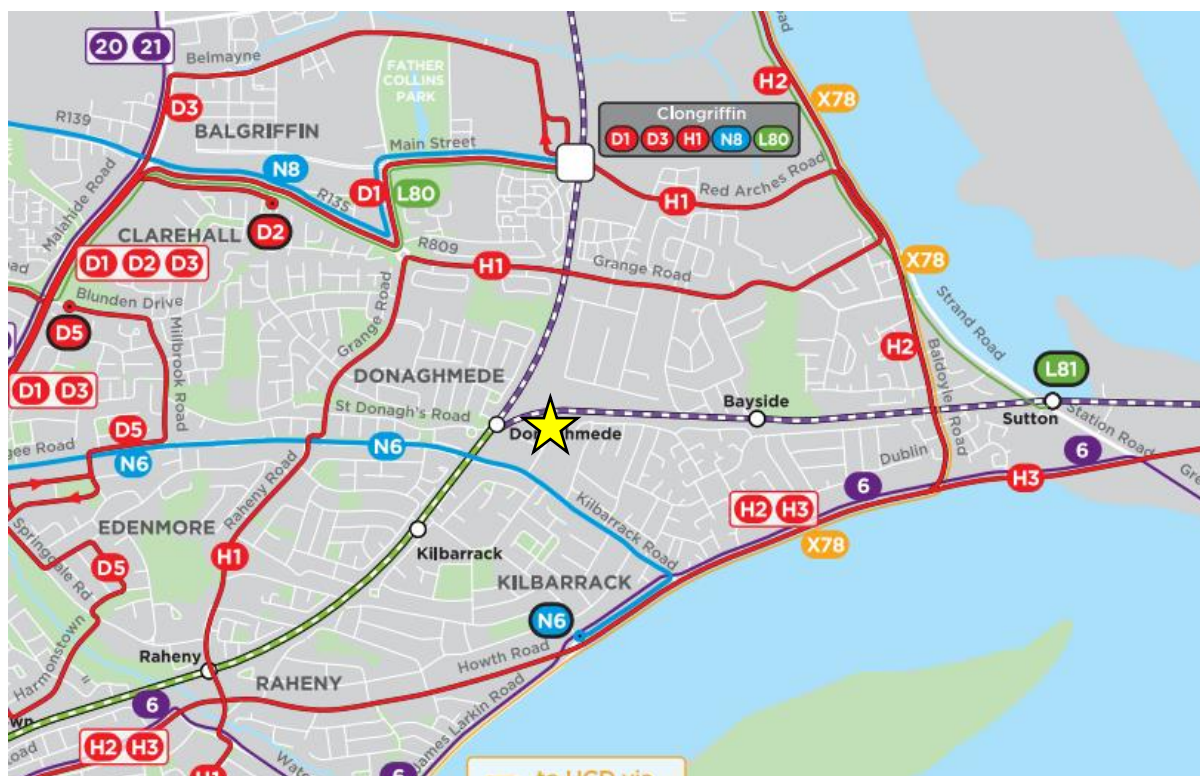


Figure 15.0 Extract from the BusConnects map indicated the submission lands (yellow star) in proximity to proposed bus services and along a railway line.

It is also highlighted within the RSES that Dublin plays a key role in attracting internationally mobile talent and investment and combines vibrant urban living, rich heritage and character and access to nature including Dublin Bay, the coastline and Dublin-Wicklow mountains. The Metropolitan Area Strategic Plan (MASP) in Chapter 5 sets out a strategy to achieve growth of 1.4 million people in Dublin City and suburbs and 1.65 million people in the Dublin Metropolitan Area by 2031 through the delivery of large-scale strategic development areas, an increase of 250,000 people or 18% from 2016. A number of the Key Growth Enablers of the Dublin City and Metropolitan Area, which are considered to be of relevance are listed in turn below:

- *To sustainably manage Dublin's growth as critical to Ireland's competitiveness, achieving growth to 1.4 million people in Dublin City and Suburbs and 1.65 million people in the Dublin Metropolitan Area by 2031.*
- *To realise ambitious compact growth targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built up area of Dublin city and suburbs and a target of at least 30% for other metropolitan settlements, with a focus on healthy placemaking and improved quality of life*

The Metropolitan Area Strategic Plan (MASP) as included within the RSES provides that, in accordance with the growth targets set out within the NPF, an approximate housing target of at least 7,500 units per year are to be provided within the metropolitan area to 2040. The Strategy supports a sequential approach to development, supported by selected metropolitan settlements that have the capacity to achieve higher residential densities, in tandem with the provision of public transport, infrastructure and services.

In addition to the above, the following Regional Policy Objectives (RPO's) are considered to be of relevance:

RPO 3.2 *Local authorities, in their core strategies shall set out measures to achieve compact urban development targets of at least 50% of all new homes within or contiguous to the*

built up area of Dublin city and suburbs and a target of at least 30% for other urban areas

- RPO 4.3** *Support the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.*
- RPO 4.83** *Support the consolidation of the town and village network to ensure that development proceeds sustainably and at an appropriate scale, level and pace in line with the core strategies of the county development plans.*
- RPO 5.3** *Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe and attractive street environment for pedestrians and cyclists.*
- RPO 5.5** *Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs and the development of Key Metropolitan Towns as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental factors.*

The inclusion of additional residentially zoned lands as part of the subject landholding will allow for the full potential of the lands to be realised. Given the location of the subject lands, within close proximity to Dublin City, it is contended that the provision of additional residential development at this location supports and accords with the policy requirements of the RSES which seek the consolidation and intensification of Dublin's suburbs and surrounding towns and villages, the facilitation of sustainable travel patterns, and the delivery of additional homes within or contiguous to existing built-up areas.

5.0 Local Planning Context

This section of the submission will examine the relevant local planning frameworks that inform the use and development of the submission lands. Documents include the Fingal County Development Plan 2017-2023 and the Draft Fingal Development Plan 2023-2029. Each of the aforementioned documents will be discussed in turn in the proceeding sections of this report.

5.1 Fingal Development Plan 2017-2023

The Fingal Development Plan 2017-2023 is the relevant statutory development plan for the area. The Development Plan is a guidance document created by the Council to help inform their Planners as well as the public, as to the types of development they would like to see in each area, as well as outlining qualitative standards all developments have to meet. This section will discuss in detail the policies which will form part on an argument as to why a development of this scale is acceptable on this site.

The following development plan objectives are considered to be of relevance to this submission:

- Objective SS15** ***Strengthen and consolidate existing urban areas adjoining Dublin City** through infill and appropriate brownfield redevelopment in order to maximise the efficient use of existing infrastructure and services.*
- Objective SS16** ***Examine the possibility of achieving higher densities in urban areas adjoining Dublin City where such an approach would be in keeping with the character and form of existing residential communities, or would otherwise be appropriate in the context of the site.***

5.1.1 Land-Use Zoning

As demonstrated in the zoning map extract below, the current land-use zoning designation pertaining to the submission lands is 'GE' – *General Employment*, the objective of which is to 'Provide opportunities for general enterprise and employment.'

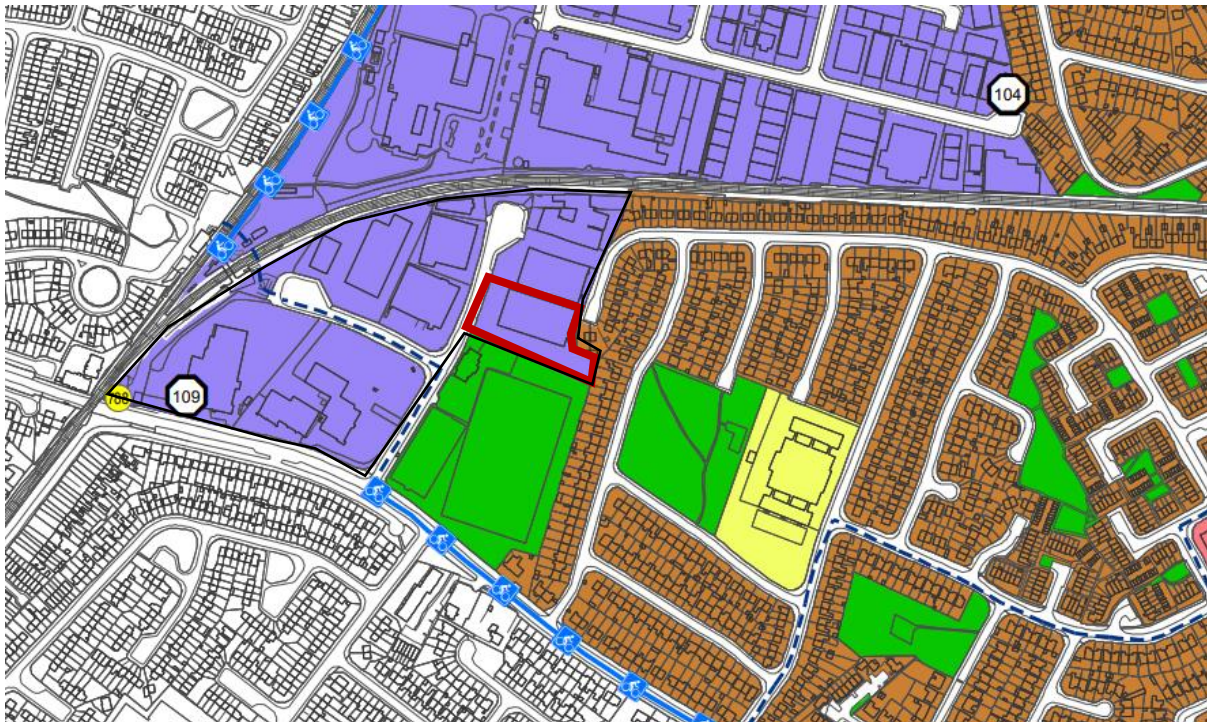


Figure 16.0 Extract from the Zoning Map (Map 10) from the Fingal Development Plan 2017-2023 showing the submission lands, outlined in black, on 'GE' zoned lands. Our clients' lands are also outlined in red.

The current development plan states that the vision for the 'GE' – General Employment zoning objective is as follows:

GE – General Employment Vision

'Facilitate opportunities for compatible industry and general employment uses, logistics and warehousing activity in a good quality physical environment. General Employment areas should be highly accessible, well designed, permeable and legible.'

The zoning matrix included in the development plan indicates 'permitted' and 'not permitted' uses in all designated zones. Permitted in principle uses are generally acceptable subject to the normal planning process and compliance with the relevant policies and objectives, standards and requirements set out in the Development Plan. The following are permitted in principle uses for sites located in the 'GE' – General Employment designation.

Permissible Uses – GE – General Employment Technology

A permissible use is one which is generally acceptable in principle in the relevant zone, but which is subject to normal planning consideration, including policies and objectives outlined in the plan. Permissible uses within 'GE' zoned lands include the following:

Permitted in Principle: 'GE' – General Employment		
<i>Builders Provider/Yard</i>	<i>Civic Waste Facility</i>	<i>Enterprise Centre</i>
<i>Food, Drink and Flower Preparation/Processing</i>	<i>Fuel Depot/Fuel Storage</i>	<i>High Technology Manufacturing</i>
<i>Industry – General</i>	<i>Industry – Light</i>	<i>Logistics</i>
<i>Office Ancillary to Permitted Use</i>	<i>Open Space</i>	<i>Petrol Station</i>
<i>Research and Development</i>	<i>Restaurant/Café⁵</i>	<i>Retail - Local < 150 sqm nfa⁵</i>
<i>Road Transport Depot</i>	<i>Sustainable Energy Installation</i>	<i>Telecommunications Structures</i>
<i>Training Centre</i>	<i>Utility Installations</i>	<i>Vehicle Sales Outlet - Small Vehicles</i>
<i>Vehicle Sales Outlet - Large Vehicles</i>	<i>Vehicle Servicing/Maintenance Garage</i>	<i>Warehousing</i>
<i>Waste Disposal and Recovery Facility (Excluding High Impact)</i>	<i>Wholesale</i>	

⁵ To serve the local working population only

Table 2.0 Table of permissible uses for sites zoned 'GE' – General Employment.

5.2 Draft Fingal Development Plan 2023-2029

As noted in the preceding sections of this report, the new Draft Fingal Development Plan 2023-2029 was published by Fingal County Council on 24th February 2022. This Draft plan sets out the overall strategy for the proper planning and sustainable development of the functional area of Fingal over a 6-year period between 2023 and 2029.

This section of the draft plan also recognises the strategic location and development potential of lands at Dunsink, which present a *'unique opportunity to significantly consolidate the Dublin Gateway in a sustainable manner underpinned by high quality public transport given the site benefits from close proximity to the existing heavy rail network at Ashtown and the proposed extension to the Luas to Finglas.'* It is further clarified that the Dunsink landbank could facilitate approximately **7,000 residential units**, having great potential to provide high quality new housing and commercial development within the County. Notwithstanding this, it is suggested within the draft plan that it is likely the regeneration of these lands will be over a longer time frame than the Plan and the overall impact on the Core Strategy for this Plan is non-existent.

Having regard to the above, it is considered that the submission lands, the site of Murdock Builders Merchants, Kilbarrack, are more suitably located to accommodate residential development, in that it is much more proximate and in fact has direct access to the Howth Junction and Donaghmede Train Station, and is directly adjacent to serviced bus stops.

In light of the above, it is considered that the proposed rezoning the subject lands from *'GE – General Enterprise'* to *'RA – Residential Area'* would provide for the logical and compact growth of the urban footprint of Dublin City, providing for additional residential accommodation at this highly accessible location, and increasing the population in the area which will in turn support the delivery and sustainability of essential services and commercial enterprises within area. It is submitted this request is in accordance with the general objectives as comprised within the Draft Plan regarding sequential and compact growth.

As previously mentioned, the submission lands are situated within the Dublin City and Suburbs Consolidation Area, with the below extract from the Core Strategy indicating the estimated population growth for the administrative area as a whole, to the years 2026 and 2029. As is evident from Figure 37.0 below, the population of Fingal is to increase from 296,200 in 2016 to 359,000 in 2029, representing an increase of **c. 21.2%**.

2016 (CSO)	2026 Low	2026 high	2029
296,200	334,745	342,245	346,298

Figure 17.0 RSES Population Projection for the Fingal County Council Area 2016-2031 (adjusted to apply headroom).

2016 (CSO)	2026 Low	2026 high	2029
296,200	334,745	342,245	359,000

Figure 18.0 RSES Population projections, adjusted to 2029 and to comply with NPO69.

Settlement Type	Settlement Name	CSO 2016 Population	Estimated 2023 Population	Estimated 2029 Population	Extant Permission	Land Availability (Ha)	Residential Yield
Metropolitan Area							
Dublin City and Suburbs Consolidation Area	Blanchardstown	107,931	124,121	138,098	1,745	150	5,742
	Baldoyle/Sutton	13,402	14,474	15,335	675	13	706
	Howth	8,294	8,875	9,336	704	14	209
	Other Settlements	15,211	16,428	17,405	467	57	1,970

Figure 19.0 Core strategy for Draft Fingal Development Plan 2023-2029, showing the projected population and land availability for the Dublin City and Suburbs Consolidation Area within which the submission lands are included.

As demonstrated in the above table the Core Strategy for the draft plan sets indicates that the population of the Dublin City and Suburbs Consolidation Area is anticipated to grow to 163,898 in 2023 (an increase of c. 13.16% from 2016) and to 180,174 in 2029 (an increase of c. 24.4% from 2016). The plan further stipulates that there is an existing land availability of 234 hectares, equating to a residential yield of 8,627 no. dwellings, this figure appears to exclude the recently zoned residential lands at Dunsink. In considering the potential land yield identified above, and taking into account the average national household size according to the 2016 census of 2.75 persons per household, the anticipated population growth for the Dublin city consolidation area to 2029 of 180,174 persons, an additional 35,336 persons on the 2016 population figures, would result in a requirement of approximately **12,849.45 no. dwellings**. In accordance with the table presented in Figure 38.0 above, the Dublin City and Suburbs Consolidation Area has a total land capacity approximately **234 hectares**, equating to a residential yield of **c. 8,627 no. dwellings**. **This represents a shortfall of c. 4,222.45 dwellings.**

Taking into consideration the total number of extant permissions as per the core strategy of 3,591 no dwellings. This would still result in a dwelling **requirement shortfall of 631.45 no. dwellings**, which needs to be urgently addressed as part of the forthcoming development plan. This will be discussed in further detail in section 7.0 of this report.

We also note the following policies as included within the draft plan in respect of compact and sustainable growth:

Policy CSP12 – NPF and RSES

Promote compact growth in line with the NPF and RSES through the inclusion of specific policies and targeted and measurable implementation measures that:

- *Encourage infill / brownfield development,*
- *Focus growth on the County's designated strategic development areas identified in the Metropolitan Area Strategic Plan (MASP),*
- *Promote increased densities along public transport corridors.*

Policy CSP19 – Compact, Sequential and Sustainable Urban Growth

*Promote **compact, sequential and sustainable urban growth to realise targets of at least 50% of all new homes to be built, within or contiguous to the existing built-up area of Dublin city and suburbs** and a target of at least 30% for other metropolitan settlements, with a focus on healthy placemaking and improved quality of life.*

It is considered that the proposed rezoning, requested as part of this submission and the subsequent development of the subject lands for residential purposes would fully accord with the key objectives of the draft plan in respect of compact and consolidated growth and will aid in realising the ambitions growth targets as set out within the NPF and RSES for at **least 50% of all new homes to be built, to be within or contiguous to the existing built up area of Dublin city and suburbs.**

5.2.1 Land-Use Zoning (Draft Fingal Development Plan 2023-2029)

In accordance with the provisions of the Draft Fingal Development Plan 2023-2029, it is noted that the subject lands retain the same zoning provisions as per the current 2017 plan, with the submission lands being zoned 'GE' – *General Employment*, the objective of which is to 'Provide opportunities for general enterprise and employment.'

One of the most significant changes put forward as part of the Draft Plan is the inclusion of the submission lands within a Framework Plan.



Figure 20.0 Extract from the Zoning Map (Map 10) from the Draft Fingal Development Plan 2023-2029 showing the submission lands outlined in black, zoned 'GE'. The lands are within an area designated for a Framework Plan.

The vision for 'GE' – General Employment zoned lands as per the Draft Plan is as follows:

GE – General Employment

'Facilitate opportunities for compatible industry and general employment uses, logistics and warehousing activity in a good quality physical environment. General Employment areas should be highly accessible, well designed, permeable and legible..'

Similar to the current plan, the new Draft Development Plan 2023-2029 sets out a number of 'permitted' and 'not permitted' use classes for each land-use zoning designation. The permissible uses for 'GE' zoned lands as per the draft plan, are as follows:

Permitted in Principle: 'GE' – General Employment		
<i>Builders Provider/Yard</i>	<i>Civic Waste Facility</i>	<i>Enterprise Centre</i>
<i>Food, Drink and Flower Preparation/Processing</i>	<i>Fuel Depot/Fuel Storage</i>	<i>High Technology Manufacturing</i>
<i>Industry – General</i>	<i>Industry – Light</i>	<i>Logistics</i>
<i>Office Ancillary to Permitted Use</i>	<i>Open Space</i>	<i>Petrol Station</i>
<i>Research and Development</i>	<i>Restaurant/Café⁵</i>	<i>Retail - Local < 150 sqm nfa⁵</i>
<i>Road Transport Depot</i>	<i>Sustainable Energy Installation³⁵</i>	<i>Telecommunications Structures</i>
<i>Training Centre</i>	<i>Utility Installations</i>	<i>Vehicle Sales Outlet - Small Vehicles</i>
<i>Vehicle Sales Outlet - Large Vehicles</i>	<i>Vehicle Servicing/Maintenance Garage</i>	<i>Warehousing</i>
<i>Waste Disposal and Recovery Facility (Excluding High Impact)</i>	<i>Wholesale</i>	

⁵ To serve the local working population only

³⁵ Ancillary to main use and of an appropriate scale

Table 3.0 Table of permissible uses for sites zoned 'GE' – General Employment (Draft Fingal Development Plan 2023-2029).

5.2.2 Sustainable Placemaking and Housing Growth

Section 3 of the Draft Fingal Development Plan 2023-2029 sets out the strategy to guide successful placemaking and ensure quality housing within Fingal over the lifetime of the draft plan and into the future. It is noted that the concept of placemaking and the provision of quality homes are not mutually exclusive and the success of both in providing for sustainable, resilient communities is inter-dependent.

The relevant policies and objectives as comprised within the draft plan, relating to housing are set out below:

Objective SPQHO8 – Consolidated residential development

Consolidate within the existing urban footprint, by ensuring of 50% of all new homes within or contiguous to the built-up area of Dublin City and Suburbs and **30% of all new homes are targeted within the existing built-up areas** to achieve compact growth of urban settlements, as advocated by the RSES.

Objective SPQHO9 – New residential development

Focus new residential development on appropriately zoned lands within the County, within appropriate locations proximate to existing settlement centres where infrastructural capacity is readily available, and along existing or proposed high quality public transport corridors and active travel infrastructure in a phased manner alongside the delivery of appropriate physical and social infrastructure.

Policy SPQHP29 – Social, Affordable and Cost Rental Housing

Promote the provision of social, affordable and cost rental housing in accordance with the Fingal County Council Housing Strategy, Part V of the Planning and Development Act 2000 (as amended) by the Affordable Housing Act 2021 and government policy as outlined by the Department of Housing Local Government and Heritage Housing for All Housing Plan to 2030

Policy SPQHP34 – Quality of Residential Development

Promote a high quality of design and layout in new residential developments at appropriate densities across Fingal, ensuring high-quality living environments for all residents in terms of the standard of individual dwelling units and the overall layout and appearance of developments. Residential developments must accord with the standards set out in the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas, DEHLG (2009) and the accompanying Urban Design Manual – A Best Practice Guide and the Design Standards for New Apartments (DHLGH as updated 2020) and the policies and objectives contained within the Urban Development and Building Heights Guidelines (December, 2018). Developments should be consistent with standards outlined in Chapter 14 Development Management Standards.

Objective SPQHO33 – Integration of Residential Development

***Encourage higher residential densities where appropriate** ensuring proposals provide for high quality design and ensure a balance between the protection of existing residential amenities and the established character of the surrounding area with a target minimum amount of 15% amount of green space, tree coverage and public space associated with every residential area.*

Policy SPQHP37 – Compact Growth, Consolidation and Regeneration

***Promote compact growth** in line with the NPF and RSES through the inclusion of specific policies and targeted and measurable implementation measures that:*

- ***Encourage infill/brownfield development***
- *Focus growth on the County's designated strategic development areas identified in the Metropolitan Area Strategic Plan*
- ***Promote increased densities along public transport corridors***

Objective SPQHO36

***Promote residential consolidation** and sustainable intensification at appropriate locations, through the consolidation and rejuvenation of infill/brown-field development opportunities in line with the principles of compact growth and consolidation to meet the future housing needs of Fingal.*

Objective SPQHO37

***Promote residential development at sustainable densities** throughout Fingal in accordance with the Core Strategy, particularly on vacant and/or under-utilised sites having regard to the need to ensure high standards of urban design, architectural quality and integration with the character of the surrounding area.*

It is noted that the redevelopment of the subject lands for residential purposes would accord with the above referenced planning policy which aims to consolidate residential development and promote the adoption of sustainable residential densities along transport corridors. The development of the lands for housing purposes would facilitate the compact growth and sustainable growth of Dublin City and its suburbs and provide for modern, high-quality housing, including social and affordable housing to accommodate anticipated population growth. Any proposed future development of the subject lands would be designed in an efficient manner in accordance with the vision, housing policies and development management criteria set out within the Draft plan.

6.0 Submission Request

The Draft Fingal Development Plan 2023-2029 seeks to support the proper planning and sustainable development of the county through the provision of adequate housing in strategic locations, within or contiguous to built-up areas, to consolidate the existing urban footprint and to promote compact growth. In light of these objectives, we would like to make a submission on the draft plan which requests the following:

- *We would request that the Planning Authority considers rezoning the submission lands from 'GE' – General Employment' to 'RA – Residential Area', the objective of which is to 'Provide for new residential communities subject to the provision of the necessary social and physical infrastructure.;*

It is submitted that the above requests are justified given the strategic location of the submission lands and would represent the logical and sustainable growth of the Dublin City and Suburbs Consolidation Area, as well as introducing a more suitable land-use on lands highly accessible lands which are surrounded to the east, north-east and south by large scale residential development. We refer to the map extract below which illustrates the proposed request in the context of the Draft Fingal Development Plan 2023-2029:



Figure 21.0 Extracts from the Fingal Development Plan 2017-2023 (Sheet 10)(left) and the Draft Fingal Development Plan 2023-2029 (Sheet 10)(right) showing the submission lands outlined in red located on 'GE' zoned lands. The lands are accessible from the surrounding existing road and rail network, are serviceable and readily available for development.

6.1 Justification and Grounds for Rezoning

This development plan submission proposes to have lands zoned 'GE' – *General Employment* in the Draft Fingal Development Plan 2023-2029 rezoned to 'RA' – *Residential Area*. This request is in keeping with the surrounding zonings of lands in the vicinity of the submission lands

The redevelopment of the subject lands is considered appropriate in the context of both regional and national guidance due to the recent refocus of national policy on compact and sustainable urban development. The future development of Fingal relies on strengthening the integration between high quality, high-capacity public transport routes and housing growth. It is essential that future development occurs in locations which are within or proximate to the Metropolitan area and well served by public transport links and recreational and social amenities.

As per the provisions of the Core Strategy Table (Table 2.14) of the Draft Fingal Development Plan 2023-2029, the population of the Fingal administrative area is projected to increase to approximately **361,894 by 2029 from 296,214 in 2016**. Given the focus on increased residential density and the

optimal use of the capacity of sites in urban locations where transport, employment, services or retail development can achieve a requisite level of intensity for sustainability, as guided by the Urban Development and Building Heights Guidelines for Planning Authorities (2018), it is considered that the subject lands could accommodate a proportion of Fingal's population growth, both up until 2029, within the life of the new development plan

It is submitted that the rezoning of the land to 'RA' is justified in the context of its strategic location within the environs of Dublin City and its suburbs. We would highlight the targets set out within the National Planning Framework (NPF) and Regional Spatial and Economic Strategy for the Eastern and Midlands Region (RSES) which seeks for **at least 50% of all new homes to be built within or contiguous to the existing built up area of Dublin city and suburbs**, there is no doubt that this ambitious vision will necessitate the provision of a significant output of residential accommodation to accommodate such a level of growth. As such, it is submitted that the Council needs to consider further strategic rezoning.

We would also reiterate the clear policy direction at a national level and as included within the NPF which provides that Dublin needs to accommodate a greater proportion of the growth it generates within its metropolitan boundaries, requiring an added focus on large regeneration and redevelopment projects. It is contended that our The submission lands at Kilbarrack may be categorised as such underutilised lands with a significant capacity to accommodate additional development. Should the proposed rezoning of the submission lands be forthcoming as part of the Fingal Development Plan 2023-2029, it would facilitate the more efficient use of serviceable and well-connected lands, in line with the key objectives of national and regional planning policy. Should the rezoning of the subject lands be considered suitable as part of the Fingal Development Plan 2023-2029, it would enable our clients to secure the necessary funds relocate to an alternative more suitable location within the Fingal administrative boundary, thus maintaining its contribution to the local economy.

We strongly consider that the submission lands present an ideal opportunity to facilitate the continued and compact growth of Dublin city and its suburbs, having the potential and capacity to deliver a high quality, high-density residential scheme. The lands are within close proximity to Dublin City, and are approximately 500m north of the village of Raheny with provides for a number of services and facilities. The site is also proximate to a train station which provides regular services into the city.

National and regional planning policy calls for an alternative type of development to the urban sprawl that has occurred continuously over the past years, promoting a shift towards more efficient public transport orientated development which will deliver more compact development patterns and provide for an enhanced quality of life for residents. Given the highly accessible nature of the subject lands, it is strongly contended that the provision of additional residential accommodation on the subject lands would deliver the type of sustainable development that is sought at a national, regional and local level.

6.1.1 Population Projections for Dublin City and Suburbs

Hughes Planning and Development Consultants have undertaken an extensive review of the Core Strategy prepared as part of the Draft Fingal Development Plan 2023-2029. It is noted within the Core Strategy of the Draft Plan, that the overall population of Fingal is to estimated grow to 361,894 to the year 2029, in accordance with the population projection targets set out within the RSES. This represents a growth of 65,680 no. persons or an overall growth of 22.2% from 2016. This projected growth has thus been allocated to the towns, villages and settlements within the Fingal County Council administrative boundary, with the Dublin City and Suburbs Consolidation Area having a projected population of 180,174 no. persons to 2029, an increase of 35,336 no. persons from 2016, and equating to 53.80% of the overall population growth for the administrative area.

Projected Population the Dublin City and Suburbs Consolidation Area (Core Strategy 2023-2029)				
Area	2016 (CSO)	2029 (Core Strategy 2023-2029)	% Change from 2016-2029	Growth of Dublin City and Suburbs Consolidation Area as a % of overall growth of Fingal 2023-2029
Fingal	296,214	361,894	(65,680) = +22.17%	
Dublin City and Suburbs Consolidation Area	144,838	180,174	(35,336) = +24.4%%	
				$35,336 \div 65,680$ (x100) = 53.80%

Table 4.0 Projected Population Growth for Fingal and Dublin City and Suburbs Consolidation Area (Core Strategy 2023-2029).

In accordance with the above population projection figures for Fingal as a whole, the Core Strategy estimates that a total quantum of approximately 16,245 no. residential units would be required for the six year period from 2023-2029. We would however consider this to represent an underestimation in required units. Taking into account the projected population growth for Fingal to 2029 of 65,680 additional people to 2029 and taking the current average household size as per the 2016 Census of 2.75, this would result in a unit requirement of 23,883.64 no. residential units over the plan period. Furthermore, taking into account the ESRI's calculation for unmet need to from 2017 to 2023Q1 minus the taskforce completions, plus the present number of homeless families of 4,073 households, this would equate to a requirement in the region of 27,956.64 no. units. Subtracting the projected volume of housing delivered from 2017-2023 of 9,960 as per table 2.9 of the Draft Plan, this would result in a total requirement of 17,996.64 no. units, thus it would appear that the projected housing demand stipulated within the plan over the plan period of 16,245 no. units would represent a shortfall of approximately 1,751.64 no. units.

Housing Demand Calculation for Fingal – HPDC

Draft Plan 2023-2029 Estimated Housing Demand (Table 2.9) = 16,245

Core Strategy Draft Plan 2023-2029 – Total Population increase to 2029 = $65,680 \div 2.75$ (average national household size 2016) = c. **23,883.64 no. units required**

ESRI calculations for unmet need 2017 to 2023Q1 minus the taskforce completions) plus the present number of homeless families) (Table 2.9) - $3672+401=$ 4,073 ($23,883.64 + 4,073 =$ 27,956.64)

Projected volume of housing delivered from 2017 to 2021 (Table 2.9) = 9,960 ($27,956.64 - 9,960 =$ **17,996.64 total units required**)

Total units required (Core Strategy) – Actual Total units required (HPDC Calc.) = $16,245 - 17,889.64 =$ **1,751.64 (1,752 Total unit shortfall)**

Table 9.0 Housing Demand Calculation.

Notwithstanding the above, Table 2.14 'Core Strategy – 2023-2029 Fingal Development Plan' of the Draft Plan indicates that land availability within the administrative boundary stands at **868 hectares**, providing for a potential residential yield of **27,615 no. units**. Including extant permissions within the

Fingal Area (6,361) in this calculation would provide for a total potential residential yield of **33,976 no. units**. It must be noted that the actual housing yield analysis is likely to fluctuate above or below the calculated outputs depending on actual and achievable density which is only known at detailed design stage.

It is noted that the Core Strategy table indicates that the Dublin City and Suburbs Consolidation Area has a total land availability of 234 hectares with a potential residential yield of **8,627 no. units**. Including extant permissions (3,591) in this calculation, the total potential residential yield would equate to a total yield of **12,218 no. units**, representing c.36% of the total potential residential yield for Fingal.

Potential Residential Yield Dublin City and Suburbs Consolidation Area (Core Strategy 2023-2029)						
Area	Land Availability (Ha)	Extant Permission	Residential Yield (Excl. Extant Permissions)	Residential Yield as a % of overall Yield for Fingal (Excl. Extant Permissions)	Residential Yield (Incl. Extant Permissions)	Residential Yield (Incl. Extant Permissions) as a % of overall Yield for Fingal
Fingal	868 (100%)	6,361	27,615		33,976	
Dublin City and Suburbs Consolidation Area	234 (27%)	899	8,627	31.2%% of overall residential yield for Fingal;	12,218	35.96 % of overall residential yield for Fingal;

Table 10.0 Potential Residential Yield (Core Strategy 2023-2029).

The above table indicates that the land availability in the Consolidation Area only **represents 27% of the overall land availability for the administrative area as a whole, similarly it demonstrates that the c. 31% (excluding extant permissions) of the overall residential yield for Fingal has been designated to the core area**. This is substantially below the stated requirements as included within the NPF and in particular, does not accord with the requirements of National Policy Objective 3b which states that at least 50% of all new homes should be delivered within the built-up footprints of the five cities and suburbs.

We consider that an allocation of 31.2% of residential yield for the Dublin City and Suburbs Consolidation Area is simply too low and further would appear to directly contravene the provisions of Policy Objective SPQHO8 as included within section 3.5.3 of the Draft Plan which states that it is the policy of the Planning Authority to *'Consolidate within the existing urban footprint, by ensuring of 50% of all new homes within or contiguous to the built-up area of Dublin City and Suburbs and 30% of all new homes are targeted within the existing built-up areas to achieve compact growth of urban settlements, as advocated by the RSES.'*

Further to the above, the total population growth envisaged for the Consolidation Area to the year 2029 as per the Core Strategy is a total 35,336 no. persons (an increase of c. 53.80% from 2016). Taking into consideration the national average household size in 2016 of 2.75, this would necessitate the requirement of 12,849.26 no. units. As detailed in Section 6.0 of this submission, the Core Strategy Table included within the draft plan indicates that the Dublin City and Suburbs Consolidation Area has a total potential residential yield of 8,627 no. dwellings, with a total of 3,591 dwellings accounted for as extant permissions. Resulting in a total yield of 12,218 no. dwellings, representing a total shortfall of 631.26 no. units over the plan period.

The above represents a significant a substantial disparity which we believe should be comprehensively addressed ahead of the adoption of the forthcoming plan, further indicating that the Council needs to consider further strategic rezoning through strategic consolidated growth of readily available and serviceable sites within the core area, which are within easy reach of public transport services. The

submission lands are an ideal candidate in this regard. We would therefore request that in the interests of proper planning and sustainable development, that Fingal County Council consider the strategic benefits of further consolidating the growth of the existing built-up footprint of the city area, and the rezoning of our the submission lands to accommodate a new residential community. Such an approach would also address the clear under allocation of residential development as part of the core strategy to accommodate the anticipated population growth envisaged for the core area.

In the context of the above, it is considered that there is not a sufficient quantum of appropriately zoned lands within the Dublin City and Suburbs Consolidation Area to accommodate the anticipated population growth for the area over the plan period. The existing zoned lands we believe, will not adequately address the more immediate housing within the built-up area of Dublin more broadly, If the Dublin City and Suburbs Consolidation area is to be capable of accommodating the projected population growth and 50% housing growth as set out within the RSES and the recently published draft plan, there is a pressing need to unlock the potential of strategically located sites, which are serviceable and readily available for development, such as the submission lands. Our clients are eager and willing to develop their lands in a sustainable manner and have the appropriate capital in place to facilitate this over the short term.

6.1.2 Serviceability of the Submission Lands

The submission lands are located proximate to existing and planned public transport infrastructure, have along Kilbarrack Parade and are benefits from being served by any required essential services. Whilst it is fully acknowledged that the submission lands are currently in use, it is clear from the arguments set out above that the future growth and operation of MDM kilbarrack at this location is in the balance, on account of the future road upgrades and the continuous expansion of residential development in the area surrounding the lands, and as such our clients are actively seeking out alternative more suitable locations for their business elsewhere within the Fingal area. To obtain clarity on the future potential of the submission lands for a more appropriate land-use our client is seeking the beneficial rezoning of the lands to accommodate a greater mix of uses, including residential. We would reiterate that the submission lands are capable of accommodating high density development, whilst also being fully serviceable in the shorter term.



Figure 22.0 Extracts from the Fingal Development Plan 2017-2023 (Sheet 10)(left) and the Draft Fingal Development Plan 2023-2029 (Sheet 10)(right) showing the submission lands outlined in red located on 'GE' zoned lands. The lands are accessible from the surrounding existing road network, are serviceable and readily available for development.

We encourage the council to consider the strategic qualities of the submission lands and their potential to support the compact and sustainable growth of the area. The proposed zoning request will in a sense create a more balanced zoning pattern, and a future development pattern on either side of the existing Navan Road. We do not consider that there is any comprehensible justification as to why the submission

lands would not be deemed appropriate for rezoning in light of the rationale presented as part of this submission.

With regards to existing services and infrastructure, it is contended that the submission lands are located within an area which have the benefit of direct access to the existing foul drainage network, water supply network and surface water disposal schemes.

In this context, the National Planning Framework tiered zoning approach and phasing, and more specifically, **National Policy Objective 72a** which requires a local authority to differentiate between zoned lands that are serviced and zoned lands that are serviceable within the life of the applicable development plan period. The applicable descriptions of each category are provided below:

Tier 1: Serviced Zoned Land

This zoning comprises lands that are able to connect to existing development services, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which there is service capacity available, and can therefore accommodate new development.

These lands will generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands. The location and geographical extent of such lands shall be determined by the planning authority at a settlement scale as an integral part of the plan-making process and shall include assessment of available development services. Inclusion in

Tier 1 will generally require the lands to be within the footprint of or spatially sequential within the identified settlement.

Tier 2: Serviceable Zoned Land

This zoning comprises lands that are not currently sufficiently serviced to support new development but have potential to become fully serviced within the life of the plan i.e. the lands are currently constrained due to the need to deliver some or all development services required to support new development, i.e. road or footpath access including lighting, foul sewer drainage, surface water drainage, water supply and/or additional service capacity.

These lands may be positioned within the existing built-up footprint of a settlement, or contiguous to existing developed lands or to tier 1 zoned lands, where required to fulfil the spatially sequential approach to the location of the new development within the identified settlement.

The potential for delivery of the required services and/or capacity to support new development must be identified and specific details provided by the planning authority at the time of publication of both the draft and final development or area plan.

As above indicated the submission lands have access to the existing foul network, water supply network and wastewater disposal schemes in the area and as such have the capacity to accommodate future development through the sequential and compact growth of the built up area of Dublin and its suburbs. The location of the submission site is ideally located to facilitate the compact and sustainable growth of Dublin City and the immediate area, being situated in an area which benefits from existing and planned public transport, existing and improved road infrastructure, whilst also benefitting from the service infrastructure that is in place to support surrounding approved developments such as foul water, mains water and energy connections, supporting economies of scale in terms of shared resources.

On the basis of the foregoing, and having regards to the site's strategic location, it is submitted that the subject lands may be categorised as Tier 1 Serviced Lands and should be developed as a priority in the short term.

It is contended that the submission lands are well served in terms of local infrastructure and are highly sustainable given their location within walking distance and ease of access to high quality rail services and, due to this, the lands should be earmarked for development in the short term.

6.1.3 Shortfall in Housing Delivery

We also highlight that the economic recession experienced between c. 2008-2015 and the rising construction costs during the subsequent recovery, resulted in a substantial drop in the growth and supply of housing output. In addition, the halt in construction projects during the covid pandemic period from 2020-2021, as well as the associated unprecedented increase in construction costs would indicate that the previous housing allocation and delivery figures outlined in the previous core strategy were not achieved.

In this regard, it is noted that the built-up area of Dublin city and its surrounding suburbs, is an area where there is a high demand for residential units of varying sizes to accommodate a mix of tenures. On this basis, it is of critical importance that sufficient lands are zoned for residential purposes as part of the new Fingal Development Plan 2023-2029, to accommodate a growing demand. To this end, we would also highlight that whilst the Planning Authority are of the view that there is an adequate quantum of zoned lands available within its administrative boundary, it must be acknowledged that whilst other lands may currently be zoned for residential development under the current and draft Plans, there is an amount of same that will not be developed over the lifetime of the plan, be it due to financial constraints or infrastructural constraints. We would also highlight that whilst permission may be granted for a particular scheme this does not necessarily transpire into the development of a site, this is evident in the current disparity between the number of planning applications which are submitted and the actual commencements of schemes within the Dublin region in 2021. The below image provides a clear illustration of this:

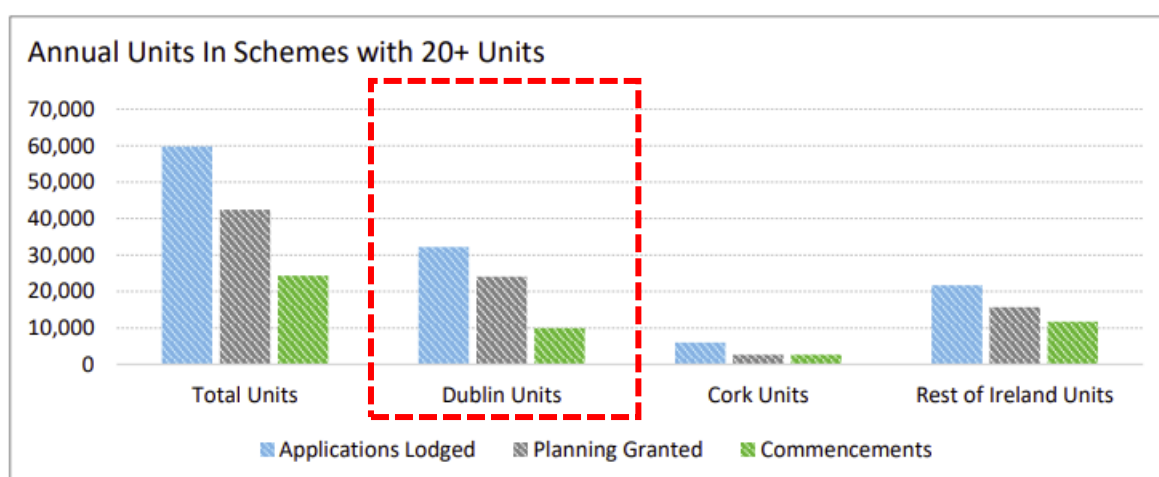


Figure 23.0 Extract from the recently published Deloitte Crane Survey Conference, March 2022 (Deloitte, 2022)

In the case of the submission lands, the site is readily available for a comprehensive redevelopment, with much of the required essential infrastructure already in place within the wider environs to serve the lands. The provision of additional 'RA – Residential Area' zoned lands at this location, as requested in this submission, will aid in meeting the current shortfall in housing input in the Dublin area and in meeting the housing delivery requirements as mandated by the NPF and other national policy documents. Notwithstanding this, the provision of a medium - high density residential development on the subject lands will involve the provision of a percentage of social and affordable housing which will help in the Government's aspiration to eradicate homelessness.

7.0 Conclusion

This submission is prepared in response to the Draft Fingal Development Plan 2023-2029. Our clients welcome the opportunity to contribute to the second stage of the development plan process for drafting the Fingal Development Plan 2023-2029 and trusts that Fingal County Council will consider the recommendations provided within this submission in preparation of the new Fingal Development Plan. In summary, this submission requests that Fingal County Council considers the following:

- *We would request that the Planning Authority considers rezoning the submission lands from 'GE' – General Employment' to 'RA' – Residential', the objective of which is to 'Provide for new residential communities subject to the provision of the necessary social and physical infrastructure.';*

For the reasons set out within this submission, it is considered that the subject lands present an opportunity to provide additional residential lands within the Fingal administrative boundary and more specifically the built-up area of Dublin to provide affordable family homes in a community setting with excellent services. The county and the wider Dublin area is suffering from a chronic shortage in housing with the most pressing need for new homes being within the confines of the existing urban footprint of Dublin city. The rezoning of the submission lands wholly supports the principles of compact and sustainable growth and will accord with the key aims and objectives of national and regional policy.

It is considered a reasonable and credible request that the subject lands are zoned for residential related uses in order to facilitate the creation of a legible high quality residential environment which accords with the key objectives of local, regional and national planning policy. It is submitted that the provision of additional housing at this location would allow for the sustainable and sequential development of the area in line with the key objectives of the National Planning Framework and the RSES, which seek to secure the compact and sustainable growth of Dublin city and its surrounding suburban area.

We trust that the Planning Authority will have regard to the contents of this submission in the adoption of the Fingal Development Plan 2023-2029 and we look forward to positive engagement with the Council and local communities in respect of the future development of the Dublin City and suburbs consolidation area.



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