

# TOWN PLANNING SUBMISSION



## DRAFT FINGAL COUNTY DEVELOPMENT PLAN 2023-2029

Lands located at Coolquay,  
Co. Dublin

May 2022

Submitted on behalf of:  
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## 1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2 have been instructed by our clients, Dean Swift Property Holdings Unlimited Company, to make a submission on the proposed Draft Fingal Development Plan 2023-2029, with respect to lands located at Coolquay, Co. Dublin. The lands which are the subject of this submission are located to the west and north-west of the rural village of Coolquay. The lands are zoned objective 'RU – Rural' as per the provisions of the current Fingal Development Plan 2017-2023 and the recently published Draft Fingal Development Plan 2023-2029.

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

- We request that the Planning Authority considers including a location specific local objective pertaining to the submission lands located at Coolquay which states the following:

### Local Objective – Coolquay Feasibility Study

**It is the objective of Fingal County Council to:**

**Carry out a feasibility study in respect of lands at Coolquay, to the north and north-west of Coolquay Rural Village. This feasibility study shall include a full investigation of requirements in terms of infrastructure, water, access, drainage and shall provide guidance on the future development potential of the landbank and inform the future designation of these lands for development.**

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

Coolquay is a linear rural settlement strategically located within the Dublin Metropolitan Area. The settlement is located to the eastern side of the M2 along the R135 close to the Dublin-Meath border. The village contains a number of one-off dwellings in the immediate surrounds and has a number of local services including a filling station, pub and restaurant along with Kilcoskan National School. Coolquay has a current population of approximately 100 people. In terms of its wider locational context, Coolquay is situated approximately 11km west of Swords, 7.5km north-west of Dublin Airport and c. 18km north-west of Dublin City Centre.

The Council has identified this area of rural Fingal as appropriate for growth in designating a substantial portion of lands (over 200 acres) at the Ward Cross as the National Food Centre (zoned Objective 'FP: - 'Food Park'). This area is straddled by land to the west zoned 'RB' - *Provide for and facilitate rural-related business which has a demonstrated need for a rural location.*

As per the provisions of the current Fingal Development Plan 2017-2023, the Zoning Objective relating to the area of Coolquay is Rural Village 'RV', the objective of which is to '*Protect and promote the character of the Rural Village and promote a vibrant community in accordance with an approved Local Area Plan, and the availability of physical and community infrastructure*'. A small parcel of land to the south of the village on the R135 is zoned 'GE – General Employment' - *Provide opportunities for general enterprise and employment*. The submission lands are located to the north and primarily west of Coolquay village of approximately 52 hectares of undeveloped land zoned Rural 'RU' to - *Protect and promote in a balanced way, the development of agriculture and rural-related enterprise, biodiversity, the rural landscape, and the built and cultural heritage*. The roadway installed by the Irish Prison Service makes up the western boundary of the submission lands and shall be discussed further below.

As part of the now abandoned Thornton Hall Prison Facility project, P.J. Hegarty & Sons were awarded the Design & Build contract for the services infrastructure upgrade along a 4.9km route on the R135 road (formerly the N2 Dublin-Ashbourne Road) to the proposed prison site. The scope of works involved the design and construction of a 300mm/450mm diameter watermain, 200mm diameter foul main & 4 no. telecommunications ducts in a combined trench on a 4.9km section of the south bound carriageway from Coldwinters Pump Station north to the proposed prison site at Coolquay Cross. The works commenced on site in February 2011 and were completed by September of the same year. Whilst plans for the prison site were shelved shortly after the completion of the above works, a national article published in the Irish Examiner in April 2022 indicated that the state is to get a new valuation for the sit in an effort to determine its future use.

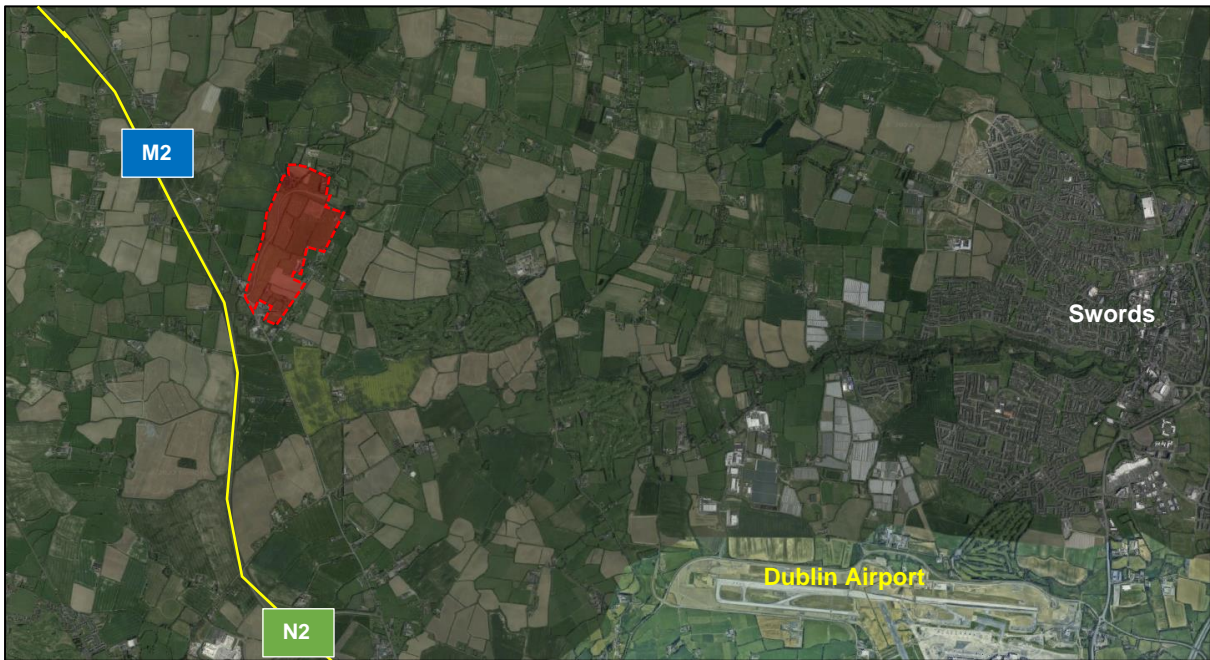


Figure 1.0 Aerial image indicating the submission lands (red outline) in the context of its wider environment

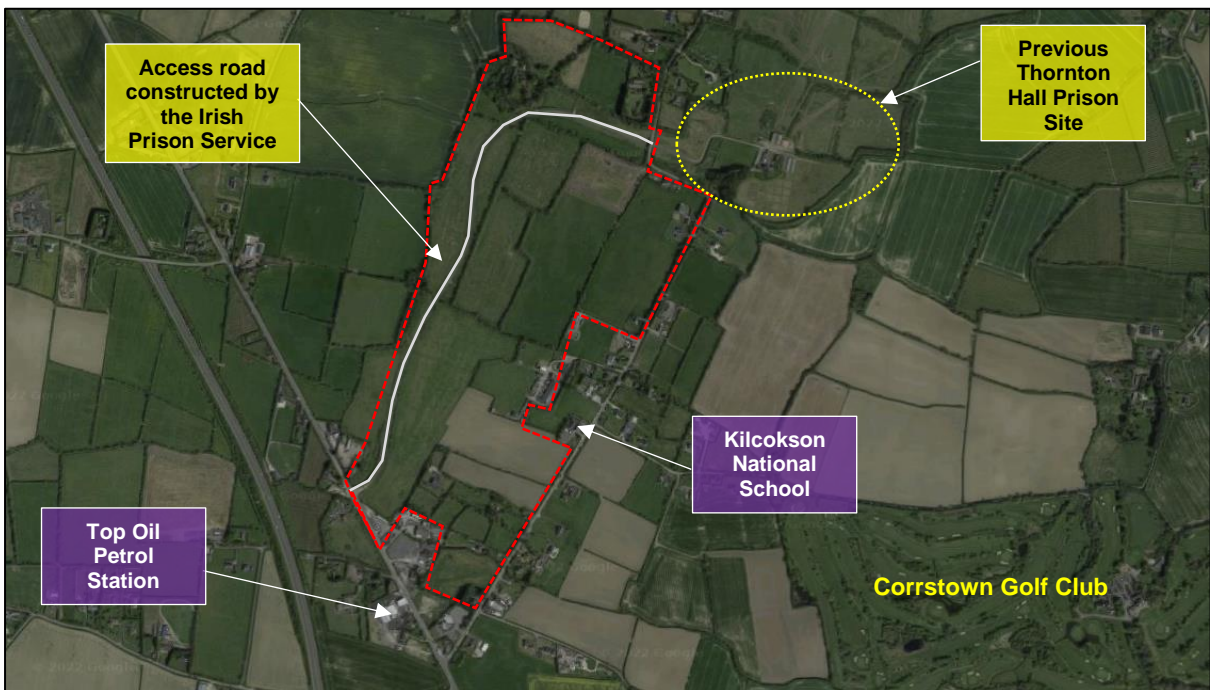


Figure 2.0 Aerial image showing the submission lands (outlined in red) in the context of its more immediate surrounds.



Figure 3.0 CGI showing the now redundant plans for the Thornton Hall prison site.

### 3.0 Planning Context of the Submission Lands

This section of the submission will examine the local, regional and national planning frameworks that inform the use and development of the subject lands. Documents of note include the Fingal Development Plan 2017-2023, the recently published Draft Fingal Development Plan 2023-2029, The Regional Spatial and Economic Strategy for the Eastern and Midland Regions 2019-2031, and The National Planning Framework (NPF).

#### 3.1 Relevant National and Regional Policy Context

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 extract below.

Some of the key shared goals which the plan aims to deliver upon include those of **Compact Growth**, and **Strengthened Rural Economies and Communities** both of which are considered to be of relevance to the requests of this submission. With respect to **Strengthened Rural Economies and Communities** it is recognised that rural areas play a key role in defining our economy and our high-quality environment must be an intrinsic part of the country's strategic development to 2040.



Figure 4.0 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 cities, towns and villages 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.'*

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.

In respect of the Eastern and Midland Region, the NPF also recognises the importance of the region as a major source of growth in the County over the plan period and affirms that:

*'The Eastern and Midland part of Ireland, will by 2040, be a region of around **2.85 million people, at least half a million more than today**.'*

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**.

Further to the above, Section 5.1 of the framework indicates that the NPF will place a major focus on rural areas in relation to:

- *Strengthening Ireland's rural fabric and supporting the communities who live there;*
- **Planning for the future growth and development of rural areas**, including addressing decline, with a special focus on activating the potential for the renewal and development of smaller towns and villages;
- *Putting in place planning and investment policies to support job creation in the rural economy;*
- *Addressing connectivity gaps; and*
- *Better co-ordination of existing investment programmes dealing with social inclusion, rural development and town and village renewal.*

In support of the above aims, we also refer to NPO 15 which provides the following:

**National Policy Objective 15**                      **Support the sustainable development of rural areas by encouraging growth** and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.

**National Policy Objective 18a**                      Support the **proportionate growth of and appropriately designed development in rural towns** that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.

**National Policy Objective 18b**                      Develop a programme for 'new homes in small towns and villages' with local authorities, public infrastructure agencies such as Irish Water and local communities to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages.

In light of the above objectives, we note that Coolquay is a village located within Dublin's metropolitan area, which has experienced extremely limited amounts of growth since its designation as a rural village in the 1999 Fingal Development Plan. In line with the policy direction at a national level, it is strongly considered that the forthcoming Fingal Development Plan 2023-2029 must provide pro-active plan led guidance in order to promote and facilitate its sustainable growth.

### 3.2 Regional Spatial and Economic Strategy for the Eastern and Midland Region 2019-2031

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.

One of the key enablers for growth across the Eastern and Midland Region as a whole, as comprised within Section 3.2 of the 'Regional Spatial and Economic Strategy for the Eastern and Midland Region'(RSES), is to support rural areas by harnessing natural resources to develop renewable, recreation and tourist opportunities, as well as promoting regeneration and revitalisation of small towns and villages. The RSES also reflects the key objectives of the NPF, which includes, enabling all parts of the Country – **both urban and rural**- to achieve their full potential.

Coolquay is situated within the Dublin Metropolitan Area. 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.

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

**RPO 4.78** *Development plans should support the development of a 'new Homes in Small Towns and Villages' initiative which would augment the delivery of actions by local authorities, Irish Water, communities and other stakeholders in the provision of services and serviced sites to create 'build your own home' opportunities within the existing footprint of rural settlements to provide new homes to meet housing demand.*

**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.*

The preparation of a comprehensive feasibility study in respect of the submission lands, we believe will allow for the full potential of the lands to be realised and will enable the provision of additional community services and local infrastructure together with residential accommodation. Given the location of the subject lands, within close proximity to the Key town of Swords, it is contended that the village has significant potential to accommodate additional development.

We would also note that facilitating housing is critical to ensuring the sustainability, vitality and viability our towns and villages. Over the past years, Coolquay and its wider environs has been subject to the sprawl of one-off housing within and outside of its core village area, as such support for additional housing and population growth within this settlement will aid in acting as a viable alternative to urban generated one-off housing, contributing to the principle of compact growth.

## 4.0 Local Planning Policy

### 4.1 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 quantitative standards all developments have to meet.

The current development plan designates Coolquay as a rural village within Dublin's Metropolitan Area. The plan further categorises Coolquay as a commuter village, whereby the level of growth must be carefully managed to ensure a vibrant sustainable community **through the Local Area Plan process**. It is indicated that a Local Area Plan will be prepared for the village over the lifetime of the development plan (2017-2023), however we note that the publication of same has not yet been forthcoming.

As demonstrated in the map extract below, Coolquay is zoned 'RV – Rural Village', the objective of which is to 'Protect and promote the character of the Rural Village and promote a vibrant community in accordance with an approved Local Area Plan, and the availability of physical and community infrastructure.' It is also provided within the plan that the overarching vision for 'RV' zoned lands is to:

*'Protect and promote established villages within the rural landscape where people can settle and have access to community services. The villages are areas within the rural landscape where housing needs can be satisfied with minimal harm to the countryside and surrounding environment.*

*The villages will serve their rural catchment, provide local services and smaller scale rural enterprises. Levels of growth will be managed through Local Area Plans to ensure that a critical*



*mass for local services is encouraged without providing for growth beyond local need and unsustainable commuting patterns.'*

The applicable zoning designation relating to the submission lands is 'RU – Rural', the objective of which is to 'Protect and promote in a balanced way, the development of agriculture and rural-related enterprise, biodiversity, the rural landscape, and the built and cultural heritage.'

Fingal's Rural Settlement Strategy includes the following policy content ins respect of Rural villages, which is considered to be of relevance:

- Promote attractive and vibrant villages;
- Ensure the sustainable expansion and development at a level appropriate to and integrated with the existing village;
- Meet the socio-economic and civic aspirations of the community whilst at the same time affording maximum environmental protection; and
- Preserve the villages' distinctive character, heritage, amenity and local identity.

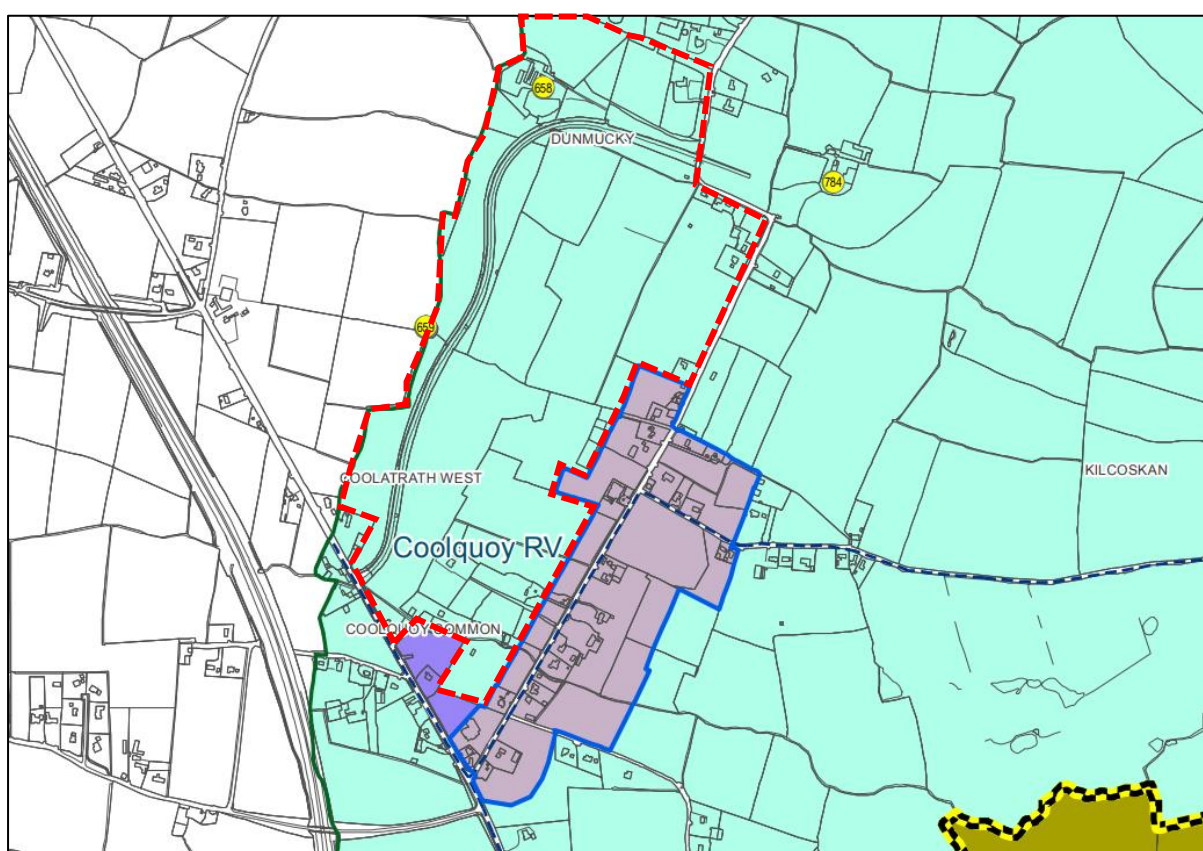


Figure 5.0 Extract from zoning Map Sheet No. 3 (Fingal Central) showing the submission lands (outlined in red) zoned Objective 'RU – Rural'

## 5.0 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 24<sup>th</sup> 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. As part of the Strategic Vision, the draft plan seeks to ensure that Fingal will continue to be a County of distinctive environmental, historical and cultural assets and local communities, with sustainable development fostering a high-quality of life for those who live, work and visit the area.

The Draft Fingal Development Plan 2023-2029 reiterates much of the key notes from the current plan. Objectives for the development of villages are set out in *Section 3.5.15.1 'Rural Villages'*. It is noted within the Draft Plan that in order to promote vitality and critical mass in relation to service provision within rural settlements, the Rural Settlement Strategy is not applicable to the Rural Villages and settlement is open to all. Coolquay is designated as a rural village within the Metropolitan area and it is stated that the rural economy is in fact driven by some of the minor towns and villages, including Coolquay.

The plan also acknowledges that future development of Fingal's villages needs careful consideration. Additionally, in the wider metropolitan area, villages need to be managed to ensure that their growth does not expand rapidly hence putting pressure on both local services and the environment thus creating a potential for unsustainable travel patterns.

Table 2.16 of the draft plan also notes that a Local Area Plan will be prepared for Coolquay within the lifetime of the Development Plan. It is our opinion that a Local Area Plan (LAP 3.B) for Coolquay incorporate the built infrastructure in already situated in close proximity to the village. The following development plan objectives relating to Rural Villages are also considered to be of relevance to this submission:

### **Policy SPQHP44 – Rural Housing**

*Provide viable options for the rural community through the promotion of appropriate sustainable growth of the rural villages and clusters, balanced by carefully controlled residential development in the countryside.*

### **Policy SPQHP51 – Growth of Rural Villages**

*Ensure that Fingal's Rural Villages accommodate additional growth in accordance with levels set out under the Housing Strategy in order to protect and enhance the character of existing settlements.*

### **Objective SPQHO55 – Rural Villages**

*Facilitate appropriate development within Rural Villages subject to compliance with the following:*

- i. The scale of new residential development shall be in proportion to the pattern and grain of the existing settlement and shall be located within the defined development boundary.*
- ii. Encourage and promote compact growth within Rural Villages including infill, brownfield development together with redevelopment of derelict/underutilised properties.*
- iii. All development shall enhance the existing village character and create or strengthen a sense of identity and distinctiveness for the settlement.*
- iv. New commercial development should be centrally located within the village and contribute positively to the streetscape and public realm.*
- v. Encourage new community and social facilities in conjunction with residential development*

### **Objective SPQHO60 – Rural Village Services**

*Promote the provision of essential services within Rural Villages to serve the local community including childcare, social infrastructure, employment and retailing services, health, recreation and leisure amenities.*

In light of the above objectives, it is clear that rural housing will be directed to Rural Villages and Rural Clusters over the lifetime of the upcoming plan, making them a more desirable location on account of the relaxation in respect of the requirement to demonstrate a rural housing need. In considered the population targets for the Metropolitan area in the coming years it is considered imperative that the future growth potential of Rural Villages such as Coolquay is closely examined as part of the new development plan, and accordingly their potential to accommodate a proportion of this growth.

The zoning map extract below indicates the location of the submission lands, adjacent to the 'RV- Rural Village' boundary for Coolquay.

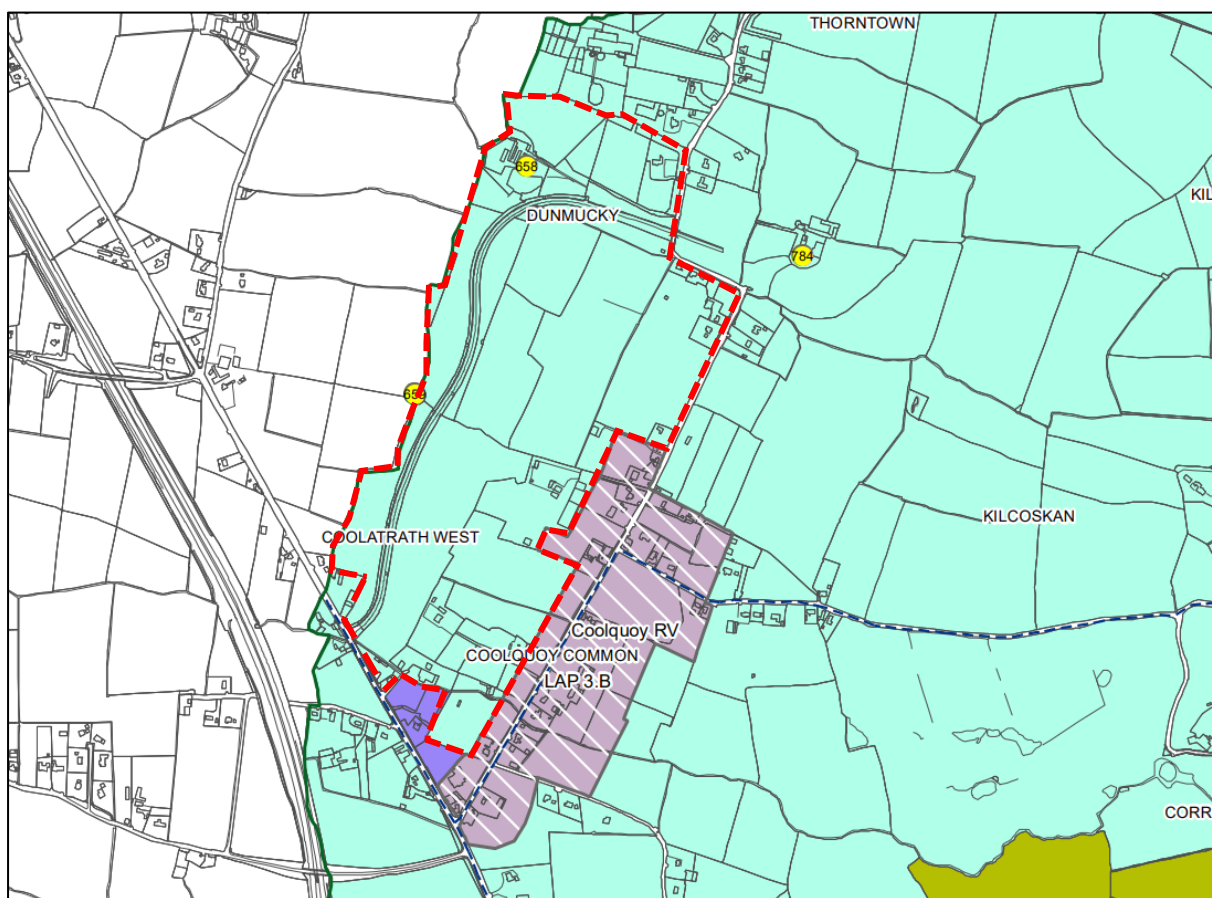


Figure 6.0 Extract from zoning Map Sheet 3 (Fingal Central) showing the submission lands (outlined in red) zoned Objective 'RU – Rural Village' (Draft Fingal Development Plan 2017-2023)

## **6.0 Submission Request**

The Draft Fingal Development Plan 2023-2029 seeks to support the proper planning and sustainable development of the county by ensuring the County continues to develop as a series of well-served, well-connected towns, villages and communities and a low carbon economy. As part of the Draft Plan, it is an objective of the Planning Authority to ensure that Fingal's Rural villages accommodate additional growth and have adopted a policy approach which promotes vitality and critical mass in relation to service provision within rural settlements. In light of these objectives, we would like to make a submission on the draft plan which requests the following:

- We request that the Planning Authority considers including a location specific local objective pertaining to the submission lands located at Coolquay which states the following:

**Local Objective – Coolquay Feasibility Study**

**It is the objective of Fingal County Council to:**

**Carry out a feasibility study in respect of lands at Coolquay, to the north and north-west of Coolquay Rural Village. This feasibility study shall include a full investigation of requirements in terms of infrastructure, water, access, drainage and shall provide guidance on the future development potential of the landbank and inform the future designation of these lands for development.**

The map extract below indicates the precise area which we believe should be the subject of the Feasibility Study as request above:

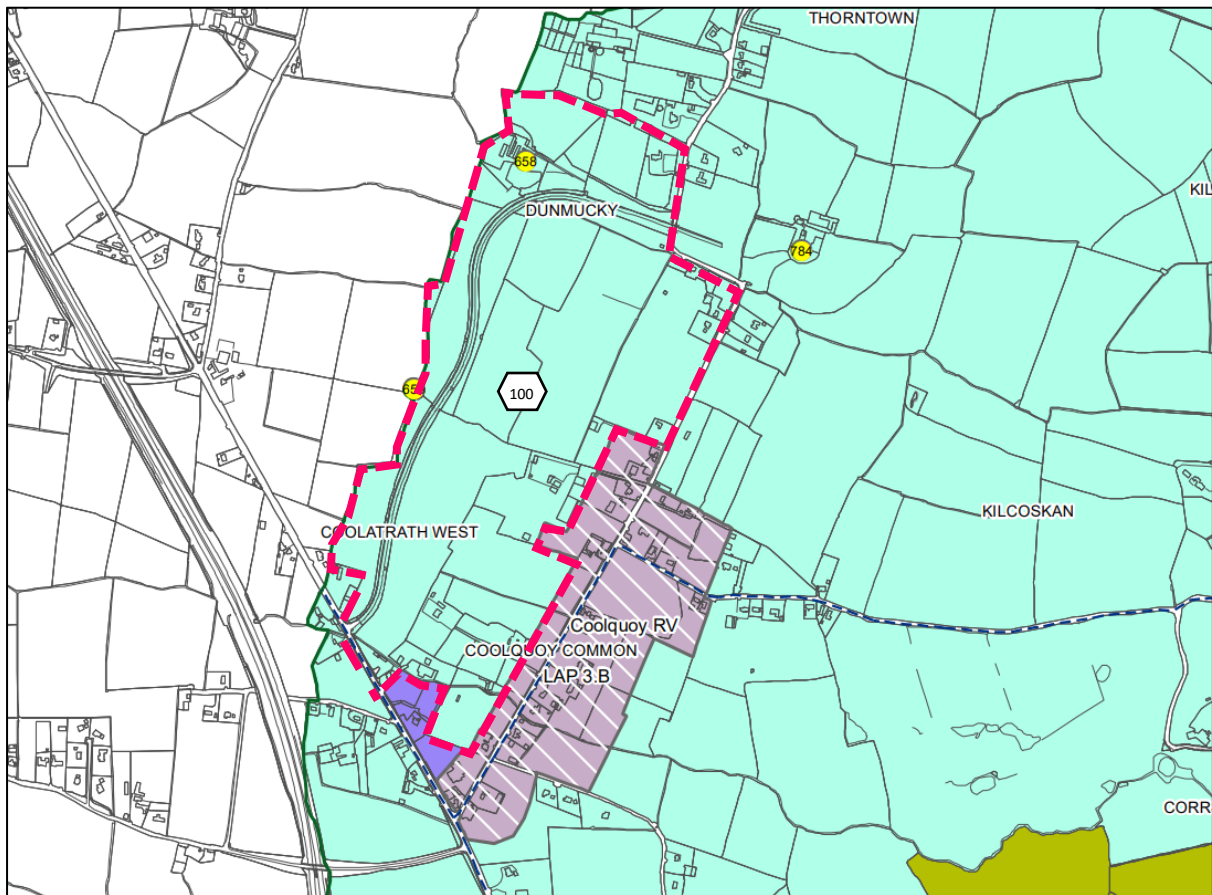


Figure 7.0 Extract from the Draft Fingal Development Plan (Sheet 3) showing the suggested lands which should be subject to a feasibility study to be prepared over the lifetime of the forthcoming plan.

This submission requests that Fingal County Council give strategic consideration to the future of Coolquay village itself and the lands in the vicinity of the former Irish Prison Services site, which benefited directly and indirectly from a significant state investment by way of the construction of a roadway with ancillary services. Enabling the use of this important infrastructure could have substantial benefit to the metropolitan village of Coolquay as many rural villages suffer vital development opportunities due to a lack of this available primary infrastructure.

Whilst both the current and draft development plans indicate that a Local Area Plan for the village will be prepared, it must be acknowledged that since the designation of Coolquay as a Rural village as part of the 1999 Development Plan, no such plan which guides the future development of the village appears to have been prepared, which in effect has delayed the development of available lands within the vicinity of the village core.

It must also be recognised that the Regional Spatial and Economic Strategy anticipates that the population of Dublin's Metropolitan Area, including its key towns and villages are set to grow to a population of 1.65 million people by 2031. In addition NPO 15 of the NPF advocates for the sustainable development of rural areas by encouraging growth. In light of these ambitious growth targets and objectives, it is inevitable that rural towns and villages comprised within the metro area will be required to accommodate a proportion of this projected growth. Despite this there is a distinct lack of guidance as part of the current and draft plan with regard to the future development and future development potential of lands at Coolquay. As such we consider it necessary for a local objective to be included within the final iteration of the Fingal Development Plan 2023-2029 which supports the preparation of detailed feasibility study for the Coolquay area over the lifetime of the plan in order to obtain further clarity regarding the development potential of lands surrounding the existing rural village designation, and in turn supporting the future growth of the area. As a result of the ongoing housing crisis and the overwhelming deficit in appropriately located housing, it is imperative that the development potential of lands within our towns and villages are unlocked and the future designation of such lands to alleviate the current shortage is considered over the plan period.

It is considered to be in the interests of proper planning and development of the County that the development plan specifically address the long term future of this area by enabling the use of existing infrastructure and through the preparation of a feasibility study which informs the future growth of Coolquay Village. We would also urge the completion of a Local Area Plan to accommodate the village of Coolquay to support the development and growth of the area.

## 7.0 Conclusion

To conclude, this submission requests the following:

- We request that the Planning Authority considers including a location specific local objective pertaining to the submission lands located at Coolquay which states the following:

### Local Objective – Coolquay Feasibility Study

**It is the objective of Fingal County Council to:**

**Carry out a feasibility study in respect of lands at Coolquay, to the north and north-west of Coolquay Rural Village. This feasibility study shall include a full investigation of requirements in terms of infrastructure, water, access, drainage and shall provide guidance on the future development potential of the landbank and inform the future designation of these lands for development.**

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 Balrothery village and its hinterland.



Kevin Hughes MIPI MRTPI  
Director For HPDC Ltd.