

TOWN PLANNING SUBMISSION



DRAFT FINGAL COUNTY DEVELOPMENT PLAN 2023-2029

Garrai Linn Residential Development
Darcystown, Balrothery, 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 client's, 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 Darcystown, Balrothery, Co. Dublin.

In its entirety, the submission lands comprise an area of approximately 2.89 hectares (c. 7.14 acres), and are located off Ringfort View in Balrothery. The lands form part of a strategically located land bank east of the M1 within the 'Core Region' of the Eastern and Midland Region. From the outset, we highlight that the submission lands, previously formed part of a larger landbank (c. 3.62 hectares), including lands to the north of the submission lands, however planning permission was successfully obtained by in December 2013 under **Reg. Ref. F13A/0322**, for the construction of 10 no. dwellings with associated public open space, internal road infrastructure and all ancillary works. This permission has been fully enacted, and is referred to throughout this submission as Garrai Linn, Phase 1.

The lands which are the subject of this submission comprise the Garrai Linn Phase 2 lands. We note that planning permission has been previously been obtained under **Reg. Refs. F14A/0488, F14A/0488E1 and F16A/0550** in respect of these lands for the construction of 42 no. dwellings which will connect with the as built Garrai Linn Phase 1 scheme, and will comprise public open space, road infrastructure and all ancillary works necessary to facilitate the development. The lifetime of the parent permission (**Reg. Ref. F14A/0488**) has been extended until **23rd December 2025**. We note that enabling works have been undertaken in respect of the Phase 2 scheme, with its completion anticipated ahead of December 2025.

As per the provisions of the current Fingal Development Plan 2017-2023 and the recently published Draft Fingal Development Plan 2023-2029, the submission lands are subject to the 'RS – Residential' land-use zoning, the primary objective of which is to 'Provide for residential development and protect and improve residential amenity'. The purpose of this submission is thus to confirm to the Planning Authority that the construction of the Garrai Linn Phase 2 scheme is imminent and, as such the existing 'RS – Residential' land-use zoning pertaining to the lands should be maintained in its entirety, in accordance with the proper planning and sustainable development of Balrothery.

In the context of the above, this submission is made 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 and requests that that Fingal County Council considers the following ahead of the adoption of the upcoming development plan:

- *We request that the forthcoming Fingal Development Plan 2023-2029 maintains the existing 'RS- Residential' land-use zoning of the submission lands, the objective of which is to 'Provide for residential development and protect and improve residential amenity', in order to facilitate the construction of the approved Garrai Linn Phase 2 residential 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

This submission relates to approximately 2.89 hectares (c. 7.14 acres) of lands located to the south-east of Balrothery village centre. The immediate area surrounding the submission lands is characterised by residential development to the north and west and by agricultural fields to the south and east. There are also some one-off rural dwellings within proximity to the site, these are mainly concentrated in linear patterns along the local road network.

With respect to the site's wider locational context, it is noted that the centre of Balrothery village is located within a 900m (10-minute) walking distance of the lands, which is home to a number of services, amenities and educational facilities, including, a pharmacy, local shop, pub/restaurant and a national school. There are also other commercial establishments within the village which offer important services

for the surrounding catchment. In terms of existing recreational facilities and open spaces, Balrothery Park is located to the south of the village on the eastern site of the R132 Regional Road, this public park is bound to the south and west by the more recently developed Balrothery playground and Astroturf pitch, the Balrothery Tennis club grounds, all of which are within a comfortable walking distance of the submission lands. The neighbouring town of Balbriggan is located to the north-east of the submission lands with access available within in 9-minutes via the 101 Bus Eireann service. The coastal town of Skerries is situated approximately 7km south-east of the site. Both towns offer a range of additional amenities, services, and facilities which are easily accessible from the key residential areas of Balrothery.



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

The more recently completed, Phase 1 Garrai Linn residential development adjoins the lands to the north, which was developed by our clients and their associated companies, providing high-quality residential dwellings to serve the growing population of Balrothery and in turn supporting the sustainable development of the village. The Phase 1 scheme comprises a total of 10 no., two-storey, 4-bedroom, detached dwellings and has been completed to an impeccably high standard. This permission is significant as it establishes the development approach to the submission lands in terms of access and location of the required public open space. The southern boundary of the submission lands comprises mature and semi-mature trees and hedge lines which are of varying quality. The lands are generally level with gentle undulations from the south-western portion of the site to the east.



Figure 2.0 Aerial image indicating the submission lands (red outline) in the context of its immediate surrounds.



Figure 3.0 Aerial image showing the completed Garrai Linn Phase 1 scheme (left) and image showing one of the completed dwellings featuring within the development (right)



Figure 4.0 Street view image indicating the completed and currently occupied dwellings featuring within the Garrai Linn Phase 1 development (left) and street view image showing the existing vehicular and pedestrian access of Darcystown Road.

The 'Ringfort' housing estate is located immediately to the northwest of the submission site. This Fingal County Council development includes traditional two storey housing with some houses accessed directly from the Darcystown Road to the north. This permission is significant as it establishes the development approach to the subject in terms of access and location of the required public open space. Other residential estates of note which are within the immediate vicinity include Rose Park, Knightswood and Balruddery Grove.



Figure 5.0 Aerial image showing the submission lands in proximity to adjacent residential estates



Figure 6.0 Aerial image illustrating the location of recreational amenities relative to the subject site (red outline).

Regarding public transport, there is a Bus Éireann stop in the centre of Balrothery with the 101 service providing a frequent connection from the town between Drogheda and Dublin city centre to Bus Áras where connections can be made to the Red Line Luas to the south-west of the county as well as the DART to south of the County. The closest rail station to the submission lands is located within Balbriggan (c. 3.1km) north. In terms of road infrastructure, access to the M1 is available to the west of the submission lands via the R132 which leads into the M50 at Junction 1 at the airport. Evidently, the

site is well served by existing road and public transport infrastructure, is within easy reach of Dublin City Centre and the neighbouring towns of Balbriggan and Skerries, making it an ideal location for the provision of additional residential development.



Figure 7.0 Aerial image showing the submission lands in proximity to existing bus stops serving Balrothery

The above extracts clearly demonstrate that the submission lands are ideally located within walking distance of Balrothery and are within close proximity a range of services and amenities, to support the provision of residential development at this location. It is noted that the lands retain their 'RS – Residential' zoning objective, which is welcomed by our clients. However we would also request that this zoning objectives remains in place in the final iteration of the Draft Development Plan in order to facilitate the delivery of already permitted and much needed homes to accommodate the anticipated population growth for Balrothery over the plan period.

3.0 Planning History

This section provides an overview of the planning history for the subject as well as planning precedents for medium scale residential 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 permission relating to the subject lands. The details of this applications are outlined below and overleaf:

Darcystown, Balrothery, Co. Dublin (Garrai Linn Phase 1)

Reg. Ref. F13A/0322 Planning permission granted by Fingal County Council on 20th January 2014 for the demolition of 2 no. derelict single storey former dwellings and the construction of 10 no. two storey, four bedroom detached dwellings, new vehicular access, internal roads, footpaths and cycle tracks, public open space, landscaping, boundary treatments, lighting, SUDS drainage, piped and other services, ESB substations and ancillary site development works necessary to facilitate the development.



Figure 8.0 Extract from the approved site layout plan under Reg. Ref. F13A/0322 (Garrai Linn Phase 1)

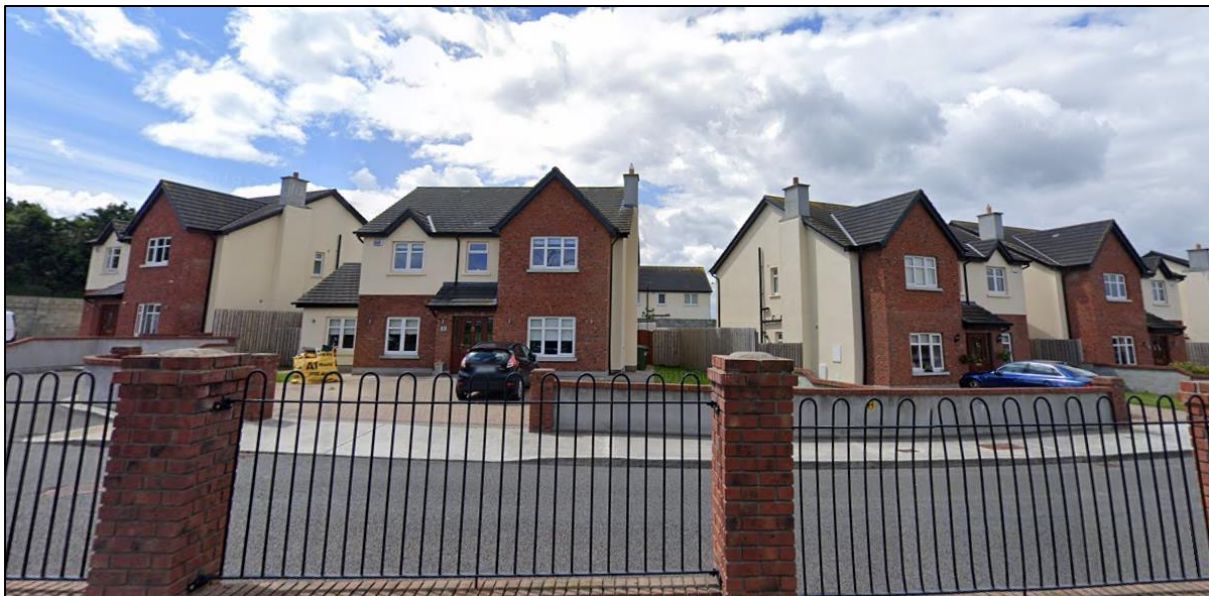


Figure 9.0 Street view image from Darcystown Road showing the completed Garrai Linn Phase 1 development

The Chief Executive's Report dated 3rd December indicated that the development of 10 no. residential units at this site was acceptable in principle, having regard to the zoning objective on site and the relevant provisions of the development plan.

Darcystown, Balrothery, Co. Dublin (Garrai Linn Phase 2)

Reg. Ref. F14A/0488 Planning permission granted by Fingal County Council on 30th June 2015 for the construction of 42 no. two storey dwellings (12 no. semi-detached three bedroom and 30 no. four bedroom detached houses), forming Phase 2 of the Garrai Linn development, a new vehicular access from the Darcystown Road serving 7 no. four bedroom detached dwellings, vehicular and pedestrian access to Garrai Linn, internal roads, footpaths, public open space, landscaping, boundary treatments, street lighting, SUDS drainage, piped and other services, ESB substations and all other ancillary site development works necessary to facilitate the development, all on lands south of the Garrai Linn development currently under construction (Reg. Ref. F13A/0322) and adjacent to the Ringfort housing estate.



Figure 10.0 Aerial image delineating the application site relating to Reg. Ref. F14A/0488 and ABP Ref. 245229 & F16A/0550 in the context of the overall submission lands.

We note the positive commentary included in the Planner's Report prepared by Fingal County Council which looks favourably on the Phase 2 development:

*'The applicant has addressed the outstanding issues. The Planning Authority considers that the proposed development by virtue of its scale and design would not unduly impact on the amenity of the surrounding residential area and accords with the applicable development plan policy. **It is therefore considered that the overall development is considered acceptable** subject to condition'.*

The decision of the Council was subsequently appealed to An Bord Pleanála under **ABP Ref. PL0F.245229**. On 10th November 2015 the Board issued a decision upholding the decision of Fingal County Council.

'Cognisance being had to the Urban Regeneration Housing Act 2015 and critical shortage of housing in the Dublin Region I consider that the proposal for residential development is in line with National Policy'.

‘Having regard to the zoning, planning history and pattern established in the area, it is considered that, subject to compliance with the conditions set out below, the proposed development, would not seriously injure the amenities of the area, would not adversely affect the character of the area, would be acceptable in terms of density, layout and design, traffic safety and foul and surface water drainage would not, therefore, be contrary to the proper planning and sustainable development of the area’.

We note that the development proposed at the subject site has been looked on favourably by both An Bord Pleanála and the Council and it is submitted that the proposed development makes appropriate use of underutilised lands, facilitating the growing need for housing throughout Dublin. It is clear from the above approvals that the principle of residential development on the submission lands is established. Ensuring that the lands remain zoned RS – Residential is vital in supporting the proposed development and will see an additional **42 no. dwellings being provided** to the local housing stock.

It is noted that the development has been subject to an extension of duration application which was also granted by Fingal County Council on 22nd May 2020 under Reg. Ref. **F14A/0488/E1**. This in effect extends the parent permission (Reg. Ref. F14A.0488) until **23rd December 2025**. However it is anticipated that the development will be completed in full in advance of then.



Figure 11.0 Drawing extract from the approved Garrai Linn Phase 2 site layout plan

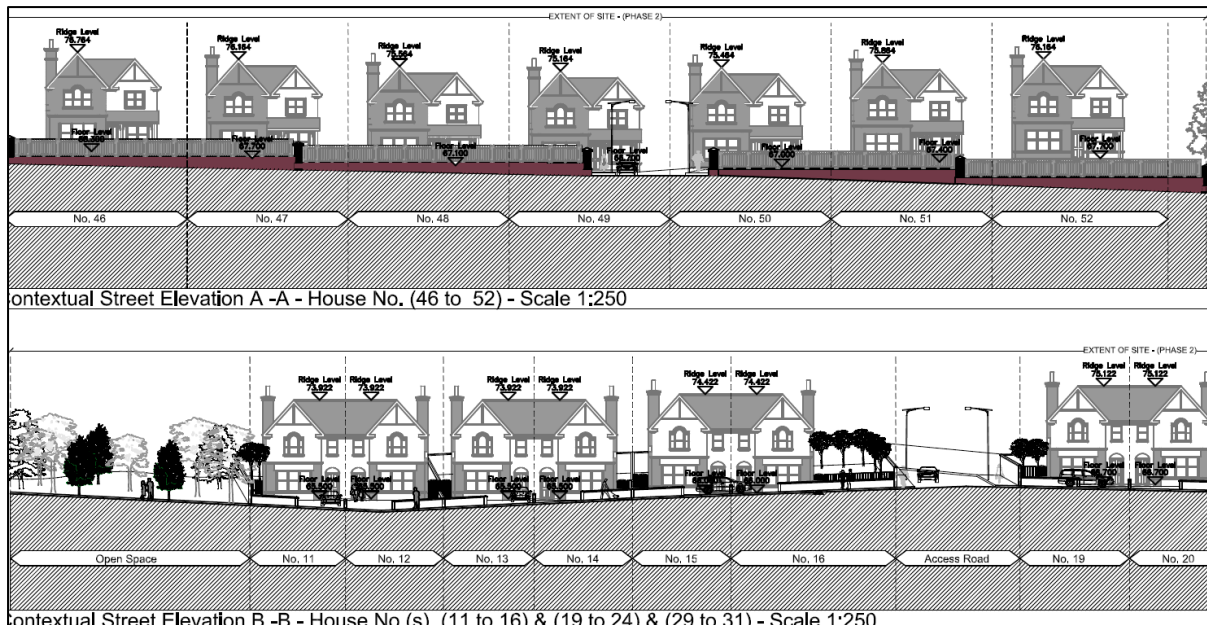


Figure 12.0 Drawing extract showing the approved dwelling elevations featuring as part of the Garrai Linn Phase 2 development

Darcystown, Balrothery, Co. Dublin (Garrai Linn Phase 2)

Reg. Ref. F16A/0550 Planning permission granted by Fingal County Council on 6th June 2017 for alterations to previously approved development (**Reg. Ref. F14A/0488-An Bord Pleanála Ref. No. PL 06F.245229**). The proposed alterations consist of minor revisions to the approved site layout only. No increase in unit numbers or change to approved house types is proposed. The development will consist of 42 no. two storey dwellings (18 no. semi-detached three bedroom and 24 no. four bedroom detached houses) forming Phase 2 of the Garrai Linn development, a new vehicular access from the Darcystown Road, vehicular and pedestrian connection to Garrai Linn, internal roads, footpaths (including link to Balruddery Grove), public open space, landscaping, boundary treatments, street lighting, SUDS drainage, piped and other services, ESB substations and all other ancillary site development works necessary to facilitate the development.

The above application proposed a minor alteration to the boundary of the site in order to reflect the ownership of the lands.

Whilst the above approvals are relatively recent and will support the growth and sustainable development of Balrothery, there are no noted recent planning permissions for medium or larger scale residential developments within the area surrounding Balrothery village. This highlights the importance of the delivery of the Garrai Linn Phase 2 development, in light of the population growth envisaged for the area over the plan period. Moreover, the previous approvals by Fingal County Council give rise to a legitimate expectation on the part of our clients that the complete build out of the above permissions is acceptable.

4.0 Planning Context of the Subject 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, The National Planning Framework (NPF) and the more recently published Housing For All – A New Housing Plan for Ireland. Each of the afore referenced documents will be discussed in turn in the proceeding sections of this report.

4.1 Relevant National and Regional Policy Content

4.1.1 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 13.0 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.'*

National Policy Objective	Eastern and Midland
1. Growing Our Regions	+ 490,000 - 540,000 people (2.85m total) +320,000 in employment (1.34m 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
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

Figure 14.0 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.'*

It is considered that the delivery of the Garrai Linn Phase 2 residential development will aid in meeting the above targets in that it will provide an additional 42 no. residential dwellings within the built-up footprint of Balrothery.

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

- National Policy Objective 3a** *Deliver at least 40% of all new homes nationally, within the built up footprint of existing settlements.*
- National Policy Objective 3b** *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.*
- National Policy Objective 4** *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.*
- National Policy Objective 5** *Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.*
- National Policy Objective 6** *Regenerate and rejuvenate cities, towns and villages of all types and scales as environmental assets, that can 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 medium 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 larger urban settlements.

Having regard to the location of the submission lands, within a short walking distance of the Balrothery village, and within close proximity to larger towns such as Balbriggan and Skerries, it is strongly contended that the submission lands present a unique opportunity for the planned and compact growth of this north Dublin village, directing development to an area which benefits from the availability of physical, social and transport infrastructure, having the capacity to accommodate further residential development accommodating the county's growing population.

The submission lands currently comprise mainly of a greenfield landbank and Phase 1 of the Garrai Linn residential development with Phase 2 pending completion having been granted under Reg. Ref. F14A/0488 and further extended under Reg. Ref. F14A/0488/E1. On the basis of the above, it is respectfully requested that the 'RS' zoning objective pertaining to the submission lands as per the provisions of the Draft Fingal Development Plan 2023-2029 remains in place over the lifetime of the plan period in order to ensure the proposed phase 2 Garrai Linn residential development is completed as per the plans and particulars submitted to Fingal County Council.

4.1.2 National Development Plan 2018—2027

The National Development Plan 2018—2027 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 development of the submission lands, in accordance with the approved plans and particulars, is considered to reflect the type of sustainable development which is sought throughout national policy in regard to the appropriate development of underutilised sites. The provision of the proposed 42 no. dwellings at the subject site as part of the overall Garrai Linn residential development will help to accommodate the growing population of the County therefore alleviating the pressures placed on the current housing system.

4.1.3 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 overleaf.



Figure 15.0 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 a sequential zoning approach should be adopted and Fingal County Council should maintain residential zonings whereby it is the clear intent of the land owner to develop the lands over the plan period, thus facilitating development as opposed to precluding it.

The delivery of the Phase 2 Garrai Linn development will provide for 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 16.0 Figure indicating the pathway to Increasing New Housing Supply

We submit that the proposed development is consistent with the above policy as it facilitates the provision of an appropriate quantum of residential accommodation on a serviceable site which is within easy reach of essential services and amenities. The provision of residential units on site also 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 cities and suburbs 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 within the residential zoned boundary of Balrothery, assisting its future growth.

4.1.4 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).

As indicated in the below map extract, Balrothery is located within the ‘Core Region’ which includes the peri-urban hinterlands in the commuter catchment around Dublin, which covers the Mid-East counties of Louth, Meath, Kildare and Wicklow.

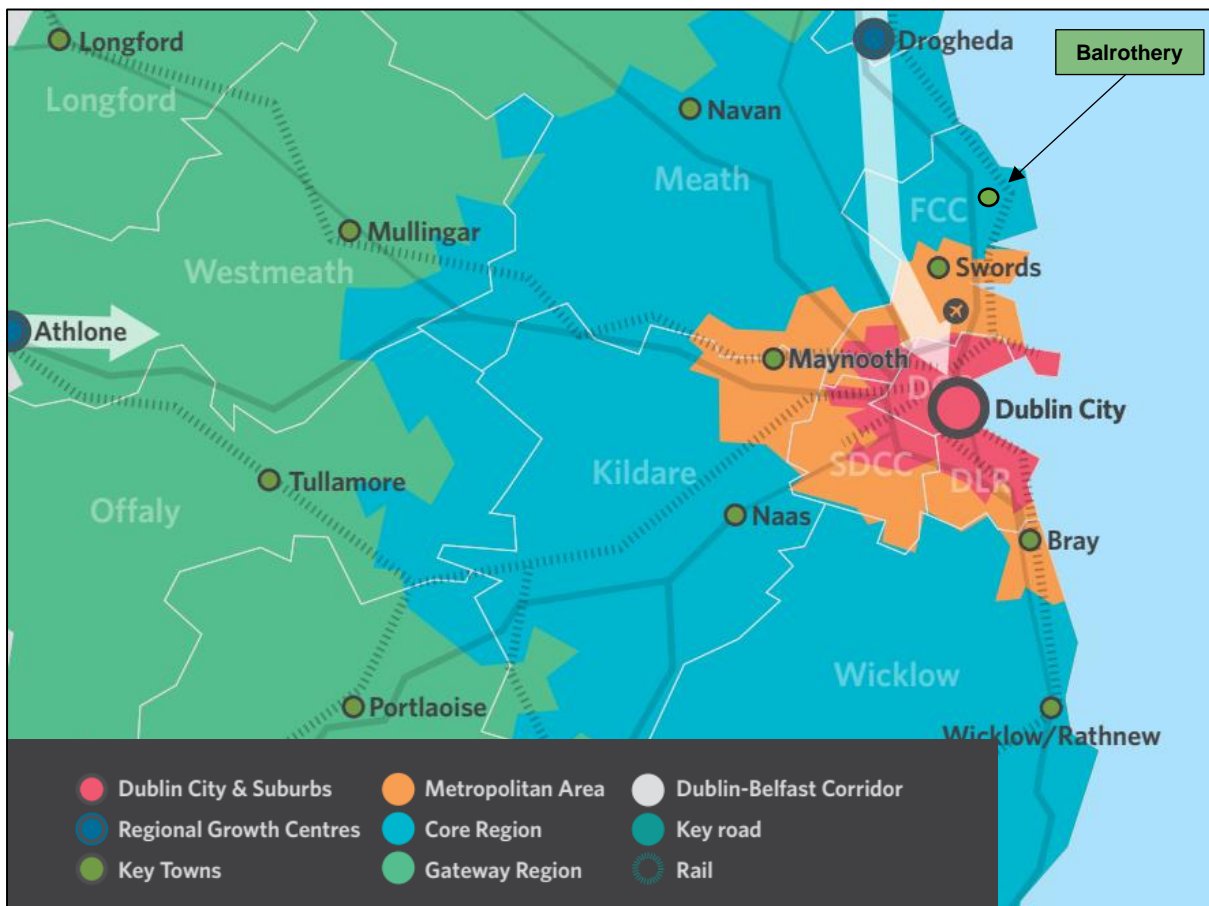


Figure 17.0 Map extract from the RSES indicating the location of Balrothery within the Core Area

It is highlighted within the RSES that in excess of 550,000 people resided in the Core Region in 2016, it is expected that this figure has subsequently increased. It is also indicated that the Core Region contains some of the youngest and fastest growing towns in the state.

The key growth enablers for the Core Region as per the RSES, include the following:

- **To promote continued growth** at more sustainable rates, while providing for increased employment and improved local economies, services and functions to allow towns become more self-sustaining and to create the quality of life to attract investment.
- Commensurate population and employment growth in Key towns, coupled with investment in enabling transport, infrastructure and services to facilitate the achievement of compact growth targets of at least **30% of all new homes to be within the existing built up area of settlements.**

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 4.78 *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.*

With regards to the above, it is considered that maintaining the submission lands current RS – Residential zoning as indicated in the Draft Plan is essential in facilitating the proposed development on the subject lands as part of the overall Garrai Linn residential development, and will aid in securing the compact and consolidated growth of Balrothery.

We would also note that facilitating housing is critical to ensuring the sustainability, vitality and viability our towns and villages. Over the past years, Balrothery has been subject to the sprawl of one-off housing within and outside of its core area, as such support for additional housing and compact 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.

5.0 Fingal Development Plan 2017-2023

The current Fingal Development Plan 2017-2023 categorises Balrothery as 'Other Hinterland Towns/Villages', noting that there is a set amount of zoning for the town and that this is in place to ensure the appropriate level of development. The Development Plan includes the following commentary with regard to this:

*'Balrothery and Loughshinny are different from the other villages in the County as both centres have been specifically identified for a limited level of additional housing development **and have the necessary residential zoning in place to facilitate this**'.*

It is further stated that Balrothery has seen extensive residential development over recent years however the natural boundary created by the surrounding greenbelt lands has restricted development to that as necessary. The submission lands are situated within the lands suitable for residential development and does not have a negative impact on the greenbelt lands which surround the village. Moreover the principle of residential development on the submission lands has already been well established by way of its associated planning history. It is submitted that the proposed development on these RS zoned lands ensures that Balrothery can develop in an appropriate manner while ensuring the footprint of the village does not become overly extensive, causing detriment to its character.

The following policy included in this section of the Plan has specific regard to development in Balrothery:

Objective SS21: *Ensure development in Balrothery and Loughshinny is sensitively designed and respects the unique character and visual amenities of these villages.*

Having regard to the above policy, it is considered that the future development of the subject lands, as approved under **Reg. Refs. F14A/0488, F14A/0488E1 and F16A/0550**, has been sensitively designed and respects the character of Balrothery village, It is submitted that the residential development will provide for the consolidation of residential development within an underutilised, well located, and serviceable site, which will aid in achieving the above goal and the stated aims and objectives of National and Regional policy documents in respect of urban compaction.

5.1 Land-Use Zoning

As demonstrated in the zoning map extract in Figure 18.0, the current land-use zoning designation pertaining to the submission lands is 'RS - Residential' the objective of which is to 'provide for residential development and protect and improve residential amenity'. The zoning map included below shows the location of the lands situated to the south-east of the Balrothery village centre. We note that the submission lands are situated adjacent to lands zoned as 'GB – Greenbelt' in the current Development Plan.

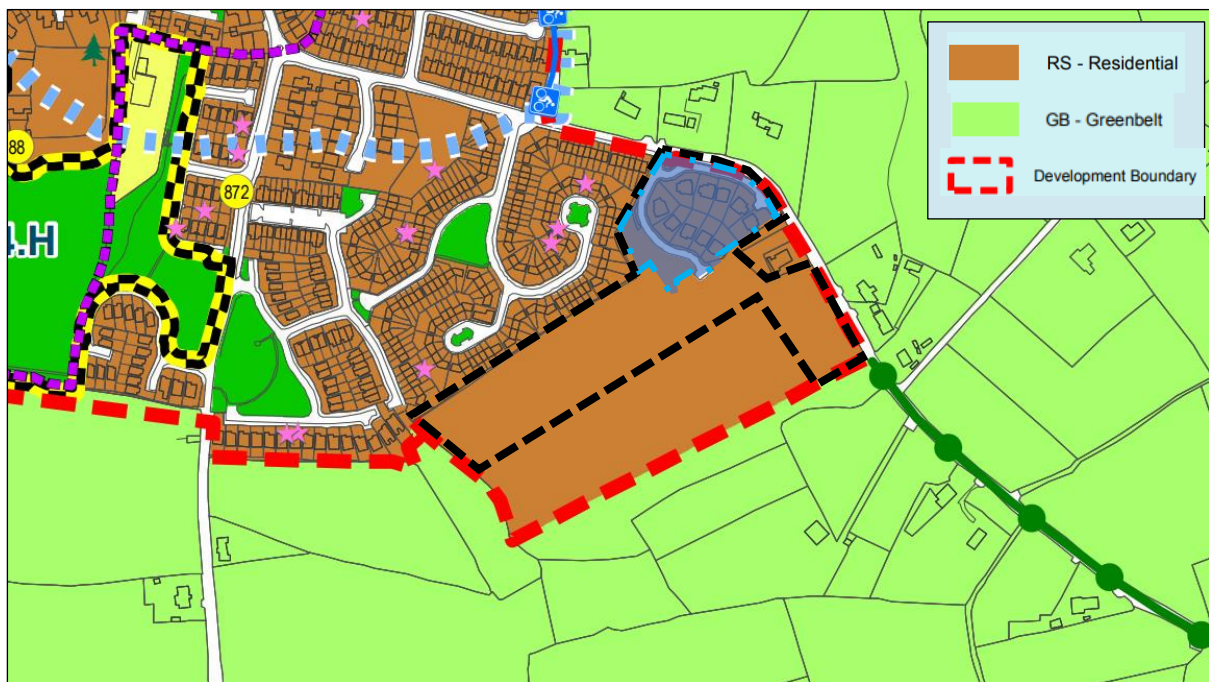


Figure 18.0 Extract from zoning Map Sheet No. 4 from the Fingal Development Plan 2017-2023 showing the subject site (outlined in black) zoned Objective 'RS' – 'Residential'.

The above map also shows other designations including an indicative cycle route to the east of Rosepark estate and preserved viewpoints along Darcystown Road.

The current development plan states that the vision for the 'RS' zoning objective is as follows:

RS – Residential

'Provide for residential development and protect and improve residential amenity.'

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 RS – Residential designation.

Permissible Uses – RS – Residential

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 'RS' zoned lands include the following:

Permitted in Principle: 'RS' – Residential		
<i>Bed and Breakfast</i>	<i>Childcare Facilities</i>	<i>Community Facility</i>
<i>Education</i>	<i>Guest House</i>	<i>Office Ancillary to Permitted Use</i>
<i>Open Space</i>	Residential	<i>Residential Car Home/ Retirement Home</i>
<i>Retirement Village</i>	<i>Sheltered Accommodation</i>	<i>Traveller Community Accommodation</i>
<i>Utility Installations</i>		

Table 1.0 Table of permissible uses for sites zoned 'RS' – Residential.

As indicated above, residential is a permitted use on RS zoned lands. As these lands have permission for 42 no. dwellings, it is critical that their current 'RS – Residential' zoning is maintained in the forthcoming 2023 development plan, to ensure the appropriate and sequential development of a high-quality residential scheme, providing much needed quality homes in the Dublin region.

6.0 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 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. 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 Plan identifies Balrothery as a Town within the Core area which has local service and employment functions. The Core Strategy of the sets out that the population of Balbriggan which includes Balrothery will have an estimated 2023 population of 25,949 no. persons (an increase in 1,922, or 8% no. from the 2016 census population results), further the estimated population for the area to the year 2029 is 27,492 no. persons (an increase in 3,465 or 14.42% from the 2016 census population results). The below table stipulates that there is a total land availability in Balbriggan and Balrothery of 116 hectares, equating to a residential yield of 4,151 no. dwellings, this figure excludes extant permissions.

Settlement Type	Settlement Name		CSO 2016 Population	Estimated 2023 Population	Estimated 2029 Population	Extant Permission	Land Availability (Ha)	Residential Yield
Core Area								
Self Sustaining Towns	Balbriggan	includes Balrothery	24,027	25,949	27,492	81	116	4,151

Figure 19.0 Core Strategy for the Draft Fingal Development Plan 2023-2029, showing the projected population and land availability for Balbriggan, including Balrothery.

Further on, the Plan identifies Balrothery as one of the 'Towns and Villages' of Fingal County which are defined as towns and villages with local service and employment functions.

Urban Capacity Assessment and Potential Residential Yield

In the context of the above, we also reference the Urban Capacity Assessment as prepared by HRA Planning which is included as part of the supplementary documentation to the Draft Plan. This assessment has been undertaken to provide the analysis to support a sustainable integrated land-use planning and transportation approach. The urban capacity assessment is based on analysis of future housing potential within the urban footprints of settlements. The map extract presented overleaf, outlines the existing undeveloped residentially zoned lands located within the Balrothery development boundary. The submission lands have been outlined in Blue for ease of reference.

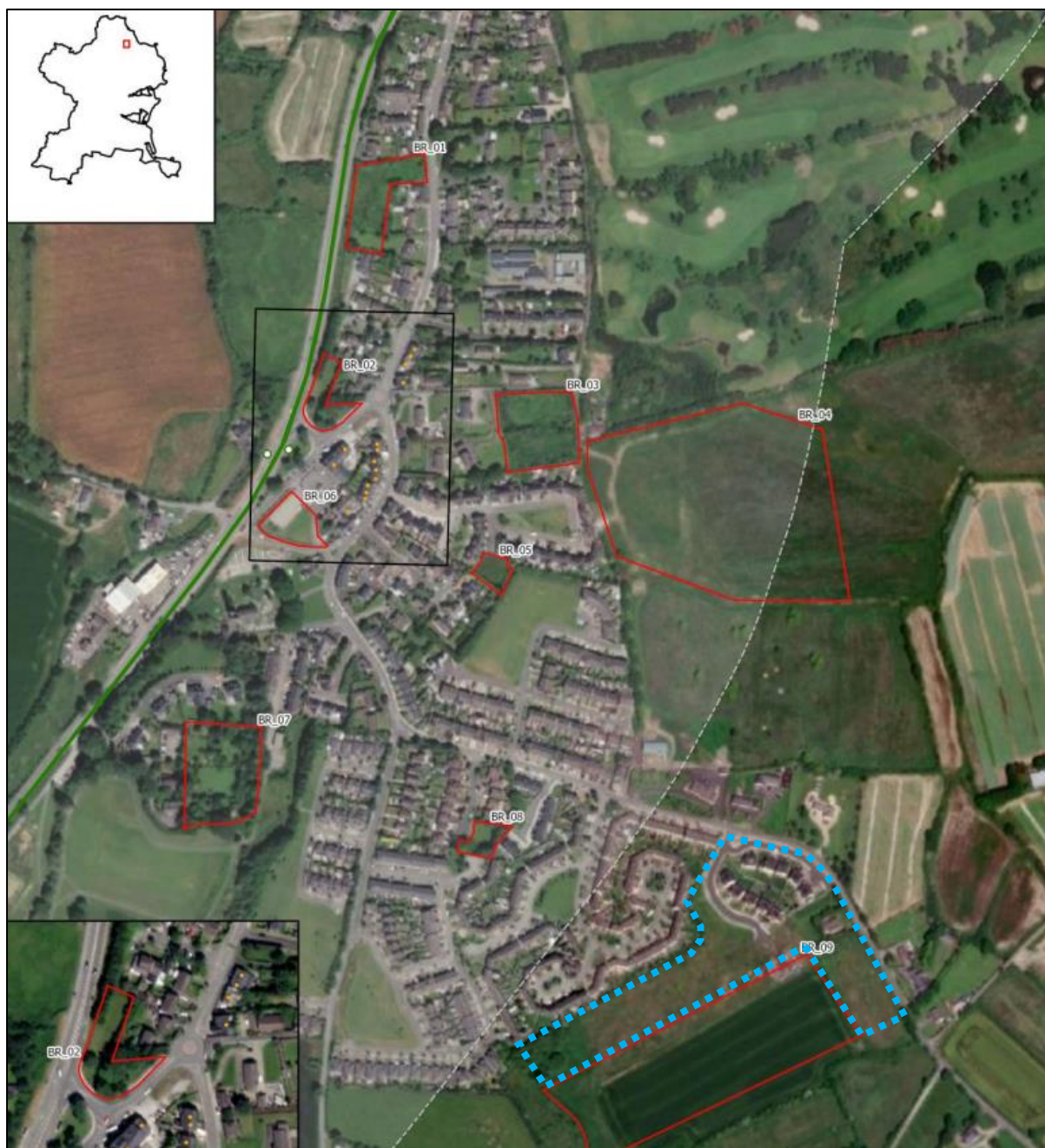


Figure 20.0 Map extract from the Urban Capacity Assessment (HRA Planning) showing the subject site outlined in blue

The Urban Capacity Assessment Analysis Table for Balrothery indicates that the village has a total capacity land capacity of 8.80 hectares and a potential residential yield of 119 no. dwellings, based on a density application of between 10-30 dwellings per hectare. This would indicate that 7.6% of the total land availability for the Balbriggan and Balrothery, is located within the confines of Balrothery. As indicated in the above map extract the submission lands are not identified as part of the Urban Capacity Analysis. There is no previous planning history associated with 6 no. of the 9 no. sites identified as part of the Urban Capacity Analysis table, indicating that the development of these lands is not anticipated or envisaged over the short term. In addition, Site no. BR_04, is indicated within the analysis table as having a potential housing yield of 29 no. dwellings, however it must be noted that this site is subject to Masterplan Area 4.B – Balrothery East. The Core Strategy of the plan clearly stipulates that the proposed Masterplan areas *'present substantial land-banks with significant redevelopment potential and regeneration potential, **requiring a long lead in time to develop a workable framework for delivery as well as significant social and physical infrastructure requirements.*** In light of this commentary, it is not anticipated that these lands will be developed in the short-term.

Further to the above, we refer to the past census population for Balrothery, which indicates that the village and its immediate hinterland had a population of 1,866 persons in 2011. The 2016 Census data demonstrates that the total population for Balrothery increased to 2,017 in 2016, representing an increase in 8.1% (an additional 151 no. persons). It is anticipated that this growth percentage will increase over the coming years, necessitating the delivery of an increased housing output. As above indicated the development of the more significantly sized sites identified within the urban capacity analysis, namely those of BR_04 and BR_09, does not appear to be forthcoming over the coming 2-3 years, given that there is no planning history pertaining to Site No. BR_09 and Site No. BR_04 is subject to the preparation of a Masterplan which does not appear to have been commenced. In light of this, our assessment would suggest that there is a need to progress residential development proposals for Balrothery over the short-term, particularly from the period of 2023-2025, to accommodate the anticipated population growth envisaged within the plan to the year 2023. In this regard, the submission lands are serviced and readily available for development. The site has the benefit of planning permission, which is in effect until December 2025, with some enabling works already being completed on site.

On the basis of the foregoing, we would strongly urge the Planning Authority to maintain the current *'RS-Residential'* zoning pertaining to the submission lands, as proposed in the Draft Fingal Development Plan 2023-2029, in order to facilitate the ongoing supply of quality homes to accommodate the anticipated population growth for Balrothery over the plan period.

6.1 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, the entirety of the subject landholding being zoned objective *'RS – Residential'*. The Draft Fingal Development Plan 2023-2029 states that the objective for *'RS'* zoned lands is to *'provide for residential development and protect and improve residential amenity'*.

As indicated in the zoning map extract above, the development boundary for Balrothery remains unchanged and terminates at the eastern, southern and western boundaries of the subject lands. It is note that the subject lands do not form part of an Architectural Conservation Area and do not contain any protected structures.

The vision for residential development for *'RS-Residential'* zoned lands as outlined within the Draft Written Statement is to:

'Ensure that any new development in existing areas would have a minimal impact on and enhance existing residential amenity.'

It is considered that the Garrai Linn Phase 2 development, as approved by Fingal County Council wholly accords with this vision.

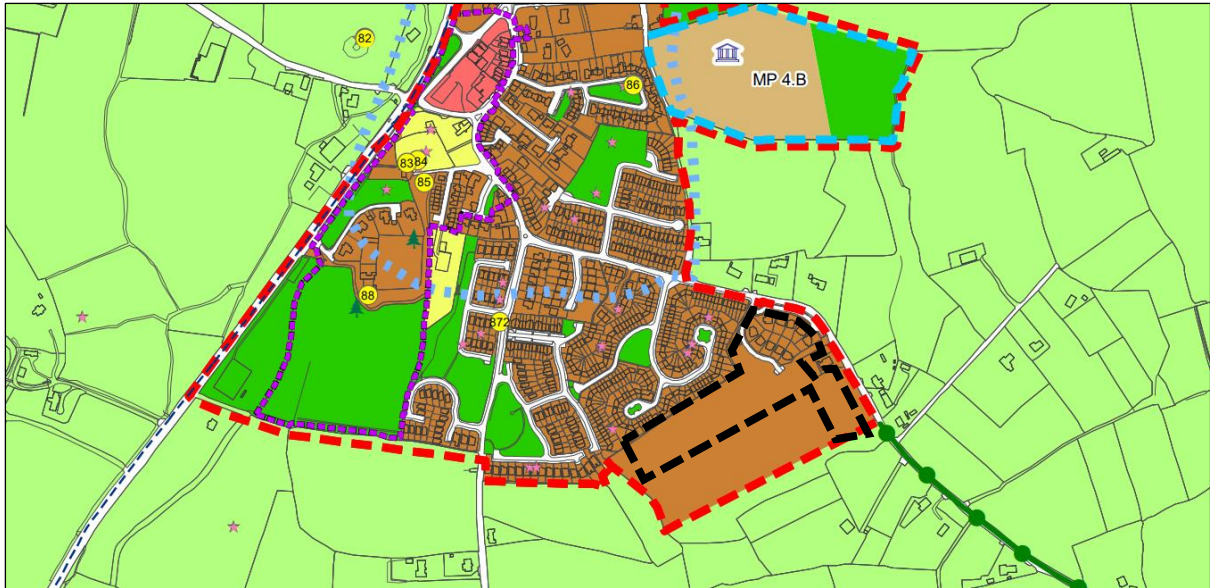


Figure 21.0 Extract from Map Sheet 4 – Balbriggan of the Draft Fingal Development Plan 2023-2029, showing the submission lands outlined in black

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 zone. The permissible uses for ‘RS - Residential’ zoned lands as per the Draft Plan, are as follows:

Permitted in Principle: ‘RS’ – Residential		
<i>Bed and Breakfast</i>	<i>Childcare Facilities</i>	<i>Community Facility</i>
<i>Education</i>	<i>Guest House</i>	<i>Office Ancillary to Permitted Use</i>
<i>Open Space</i>	Residential	<i>Residential Care Home/Retirement Home</i>
<i>Retirement Village</i>	<i>Sheltered Accommodation</i>	<i>Traveller Community Accommodation</i>
<i>Utility Installations</i>		

Table 2.0 Table of permissible uses for sites zoned ‘RS’ – Residential (Draft Fingal Development Plan 2023-2029)

In accordance with the use class matrices presented in Table 2.0 above residential developments is permitted use on ‘RS’ zoned lands, and as the site currently has the benefit of planning permission, we would emphasise the importance in ensuring the submission lands remain zoned as ‘RS’ to facilitate the development of **42 no. dwellings at these lands.**

Having regard to the site’s location, immediately adjacent to an established and growing residential area, proximate to existing services and facilities and within close proximity to larger towns such as Skerries and Balbriggan, it is considered that the subject lands should remain as a residential use. It is considered that the lands are currently underutilised and as planning permission of phase 2 of the Garrai Linn development has planning permission at the site, that a housing need can be met in an area where there is limited available RS zoned lands. Ensuring that these lands remain as residential lands will help to ensure that the growth of Balrothery does not sprawl out into the surrounding greenbelt zoned lands and in accordance with the proper planning and sustainable development of the area.

We also make reference to the below policy objectives as included within the draft plan, which are considered to be of relevance to the approved development.

Policy CSP38 – Sustainable Expansion and Development

Promote sustainable expansion and development at a level appropriate to and integrated with the existing town or village, meeting the socio-economic and civic aspirations of the community, whilst preserving the settlements distinctive character, heritage, amenity and local identity.

Objective CSO64 – Scale of New Housing Developments in Towns and Villages

Ensure that the scale of new housing developments within Towns and Villages both individually and cumulatively, shall generally be in proportion to the pattern and grain of existing development.

Objective CSO67 – Compact, Organic and Sequential Development of Towns and Villages

The scale of new residential schemes within Towns and Villages shall be in proportion to the pattern and grain of existing development with a focus on delivering compact growth and providing for the organic and sequential development of the settlement. Infill and brownfield development shall have regard to the existing town or village character and create or strengthen a sense of identity and distinctiveness for the settlement.

The above-mentioned policy and objectives highlight the type of development which is appropriate for Fingal's Town and Villages. It is considered that the submission lands are consistent with this as the Garrai Linn Phase 2 development seeks to provide for housing within suitably zoned lands in a compact manner, ensuring no negative impact on the village centre character of Balrothery.

6.2 Sustainable Placemaking and Housing Growth (Draft Fingal Development Plan 2023-2029)

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 development of the subject lands for residential purposes, in accordance with the permitted layout as approved under **Reg. Refs. F14A/0488, F14A/0488E1 and F16A/0550** complies with the above referenced planning policy which aims to consolidate residential development and promote the adoption of sustainable residential densities. The development of the lands for housing purposes would facilitate the compact growth of Balrothery and provide for modern, high-quality housing, including social and affordable housing, to accommodate anticipated population growth targets set out within the NPF and RSES. It is submitted that the proposed development would be designed in an efficient manner in accordance with the vision, housing policies and development management criteria set out within the draft Plan.

7.0 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 request that the forthcoming Fingal Development Plan 2023-2029 maintains the existing ‘RS- Residential’ land-use zoning of the submission lands, the objective of which is to ‘Provide for residential development and protect and improve residential amenity’, in order to facilitate the construction of the approved Garrai Linn Phase 2 residential development.*

It is submitted that the above request is justified given the fact that there is currently a planning permission in place in respect of the submission lands which seeks to construct a further 42 no. dwellings at the Garrai Linn residential development site of which phase 1 has already been completed. The development will provide for much needed housing in an area which is well-served, is within a short-walking distance of many essential services and is well connected to the village centre of Balrothery as well as the neighbouring self-sustaining town of Balbriggan. It is therefore requested that Fingal County Council maintain the submission lands current zoning to facilitate its development, and in turn supporting the compact and sustainable development of the village.

7.1 Justification and Grounds for Maintaining RS Zoning

This Development Plan submission proposes that the lands which located to the south of the completed Garrai Linn Phase 1 residential development retain their ‘RS-Residential’ zoning as comprised within the recently published Draft Fingal Development Plan 2023-2029. Our client welcomes the contents of the Draft plan particularly with regard to the Garrai Linn residential lands and recognises Fingal County Council’s commitment to facilitating the future development of the submission lands.

We highlight that the submission lands already have the benefit of planning permission, which is in effect until 23rd December 2029. In this regard we note that the previous approvals pertaining to the lands under **Reg. Refs. F14A/0488, F14A/0488E1 and F16A/0550, permits the construction of 42 no. dwellings, public open space vehicular and pedestrian routes, together will all associated ancillary works necessary to facilitate the development.** Dean Swift and their associated companies, have also recently developed and completed the adjacent residential scheme to the north, referred to as Garrai Linn Phase 1. This first phase comprises of 10 no. dwellings which are now fully occupied. It is proposed that the Phase 2 scheme, will connect to the completed Phase 1 development with a combined road and pedestrian network, and will benefit from the existing service infrastructure in place to support the development such as foul water, mains water and energy connections. Whilst the extant permission relating to the subject lands is in place until 2025, some of the enabling works on-site have already been undertaken and it is anticipated that the Phase 2 section of the estate will be completed in advance of this date.



Figure 22.0 Extract from the approved site layout plan, showing the completed Garrai Linn Phase 1 development shaded in blue

We would also reiterate to the Planning Authority that our clients, Dean Swift Property Holdings and their associated companies, are reputable and astute property developers, building a strong rapport with both communities in the Fingal Area and Fingal County Council over the past number of years

through positive, consultative engagement. As a family run business, Dean Swift and their associated construction companies, have developed a large quantum of homes within the Fingal Area, particularly in the areas of Balbriggan, Balrothery and Howth, which demonstrate innovative designs of the highest standard. The company are committed to the communities they create. Some examples of developments completed by our clients in north Dublin include, Prospect Housing Estate, Balbriggan, Hampton Woods, Balbriggan, Garrai Linn, Balrothery, to mention a few, and are consistently bringing forward development proposals for bespoke residential schemes in the Fingal Area.



Figure 23.0 *Garrai Linn, Balrothery*



Figure 24.0 *Hampton Woods, Balbriggan*



Figure 25.0 *Prospect, Balbriggan*

In addition to the above, Crescent Park Properties (an associated company of Dean Swift) have previously obtained planning permission for an extensive residential development under **Reg. Ref. F08A/1329 and Reg. Ref. F08A/1329E1** for the construction of 532 no. dwellings on lands located in north-west Balbriggan, this development also includes a Class 1 public park, the Balbriggan C-Ring Road and Boulevard, public open space, internal vehicular and pedestrian infrastructure and all associated works necessary to facilitate the development. It is noted that works on the Class 1 Public Park and Boulevard road are complete, with the Boulevard Road being open and operational.



Figure 26.0 Drone image showing the completed Class 1 Pitch at Balbriggan north-west. It is noted that our clients are ready to initiate the taking in charge process for this aspect imminently with Fingal County Council

Our clients are currently engaging in pre-planning discussions with Fingal County Council as part of the recently adopted Large Scale Residential Development (LRD) application process in respect of lands in north-west Balbriggan and a formal planning application will be submitted in relation to same in due course. The newly proposed scheme on the submission lands will comprise approximately 200 no. apartment and duplex units and 393 no. two storey family homes. The images below provide a preliminary overview of the proposed scheme:



Figure 27.0 CGI of the proposed development at north-west Balbriggan



Figure 28.0 CGI of the proposed apartment units and dwellings on the Balbriggan north-west lands



Figure 29.0 CGI of the proposed apartment units on the Balbriggan north-west lands

It is also prudent to highlight that Dean Swift and their associated companies have been working extensively in partnership with Fingal County Council over the past years in respect of lands in the Balbriggan area. In fact, we note that our clients ceded to the Planning Authority, **at no cost**, the lands required for the construction of the Castlemill Link Road. In addition, Dean Swift and their associated companies, have also worked closely in conjunction with Fingal County Council to facilitate the delivery of the waste water scheme and waste water pumping station on lands within their ownership at north-west Balbriggan.



Figure 30.0 Aerial image outlining the north-west at Balbriggan in red

The above clearly demonstrates our clients commitment to delivering sustainable neighbourhoods quality homes in the north-Dublin area as well as facilitating and working in conjunction with the Planning Authority in facilitating the delivery of key infrastructure to sustain the growing population of the area. Our clients overarching vision is to continually shape communities and apply their expertise to make the company an industry leader in residential development. The Garrai Linn Phase 2 scheme, as approved on the submission lands is no exception to this ethos, providing homes of the highest quality. As such we would ask the Fingal Council take cognisance of this and facilitate the development of the submission lands, through maintaining the current residential zoning pertaining to the lands.

Furthermore, we note that Hughes Planning and Development Consultants have been actively engaging with Fingal County Council's Housing Department with regard to Part V provision on the submission lands. It is noted that the need for social housing is growing with the population and so the development will assist in addressing the need for this type of housing. It would therefore be considered that the proposed development at the submission lands is essential in addressing the shortfall in such housing. We therefore would consider it necessary to maintain the submission lands current zoning which permits residential development.

7.1.1 Population Projections and Urban Capacity

As outlined in Section 6.0 of this submission, census population data for Balrothery demonstrates that the village and its immediate hinterland had a population of 1,866 persons in 2011. The 2016 Census data demonstrates that the total population for Balrothery increased to 2,017 in 2016, representing an increase in **8.1% (an additional 151 no. persons)**. It is anticipated that this growth percentage will increase over the coming years, necessitating the delivery of an increased housing output. Referring to the Urban Capacity Assessment for Balrothery which accompanies the Draft Plan, it is indicated that the village has a limited land availability of **8.80 hectares** and a potential residential yield of 119 no. dwellings based on a density application of between 10 and 30 dwellings per hectare.

That said, the more significantly sized sites identified within the urban capacity analysis, namely those of BR_04 and BR_09, does not appear to be forthcoming over the coming 2-3 years, given that there is no planning history pertaining to Site No. BR_09 and Site No. BR_04 is subject to the preparation of a Masterplan which does not appear to have been commenced to date. In fact, the ore strategy of the plan confirms that the proposed Masterplan areas *'present substantial land-banks with significant redevelopment potential and regeneration potential, requiring a long lead in time to develop a workable framework for delivery as well as significant social and physical infrastructure requirements.*' In light of this commentary, it is not anticipated that these lands will be developed in the short-term.

In considering the above, our assessment would suggest that there is a need to progress residential development proposals for Balrothery over the short-term, particularly from the period of 2023-2025, to accommodate the anticipated population growth envisaged within the plan to the year 2023. In this regard, the submission lands are serviced and readily available for development. The site has the benefit of planning permission, which is in effect until December 2025, with some enabling works already being completed on site.

We therefore 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. Due to the shortfall in lands zoned which can facilitate residential development in the short-medium term, it is considered important to maintain the residential zoning of the submission lands to facilitate residential development which addresses shortfalls in both public and private housing.

We also reference 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 overleaf:

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 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 waste water 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 Balrothery, being located in an area which benefits from existing public transport, existing and improved road infrastructure, whilst also benefitting from the service infrastructure that is in place to support the existing Garrai Linn phase 1 scheme such as foul water, mains water energy connections and road infrastructure.

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, as such the current 'RS – Residential' zoning is considered entirely appropriate and should be maintained in the final iteration of the Fingal Development Plan 2023-2029.

7.1.2 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 towns and villages located in north-Dublin, 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, 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:

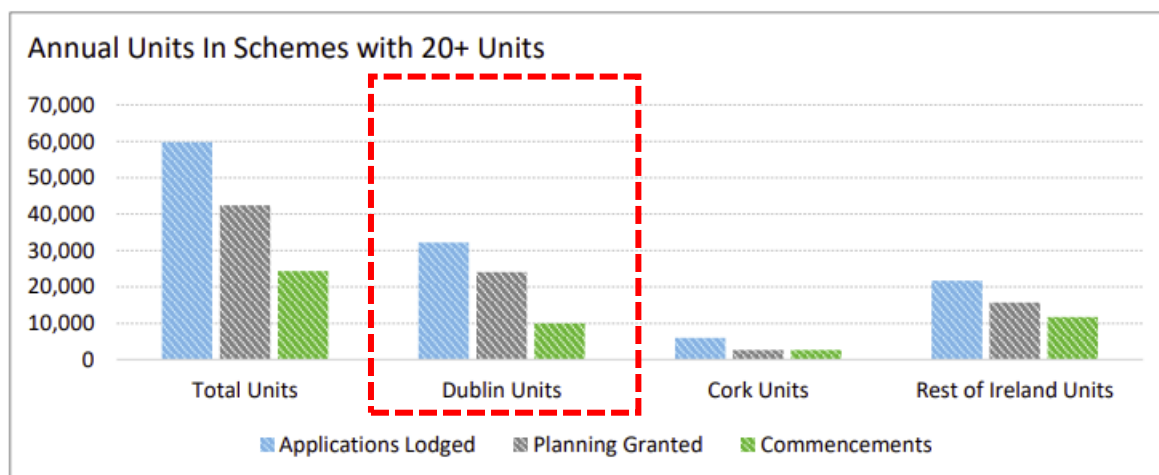


Figure 31.0 Extract from the recently published Deloitte Crane Survey Conference, March 2022 (Deloitte, 2022)

In the case of the submission lands, the site is readily available for development, with much of the required essential infrastructure already in place within the wider environs to serve the lands. Further to this, as the lands are zoned, with a planning application in place for 42 no. dwellings Our client's are committed to the delivery of the completed Garrai Linn scheme and have the necessary financing in place to facilitate this over the short term.

It is submitted that ensuring the zoning of these lands are maintained will in turn 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 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. We highlight that Hughes Planning and Development Consultants has engaged with Fingal County Council with regard to the provision of Part V housing and that the development will be completed as per the plans and particular included with the grant of permission under Reg. Ref. **F14A/0488 and as extended under Reg. Ref. F14A/0488/E1.**

8.0 Conclusion

This submission is prepared in response to the Draft Fingal Development Plan 2023-2027 in preparation for a new development plan for the county. Our client welcomes 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 request that the forthcoming Fingal Development Plan 2023-2029 maintains the existing 'RS- Residential' land-use zoning of the submission lands, the objective of which is to 'Provide for residential development and protect and improve residential amenity', in order to facilitate the construction of the approved Garrai Linn Phase 2 residential development.*

It is considered a reasonable and justified request that the subject lands maintain their current zoning for residential related uses in order to facilitate completion of the Garrai Linn residential development, and to allow for 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 Balrothery village and its hinterland.



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