



DRAFT DEVELOPMENT PLAN SUBMISSION

**DRAFT FINGAL DEVELOPMENT PLAN 2023-2029
(STAGE II CONSULTATION)**

**Proposed Re-zoning to "RA - Residential Area" of
Lands at Beau, Lusk, co. Dublin**

Client: Gannon Homes

May 2022

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FINGAL DEVELOPMENT PLAN 2023-2029

DRAFT PLAN
24TH OF FEBRUARY 2022

WRITTEN STATEMENT

EXECUTIVE SUMMARY

This submission is made by Downey, on behalf of our client, Gannon Homes, in relation to proposed re-zoning of the lands at Beau, Lusk, co. Dublin to “RA – Residential Area”. This is submitted to Fingal County Council in the context of the Draft Fingal County Development Plan 2023-2029, which is currently on public call for submissions. The grounds and justifications to the following submission are summarised as follows:

- *Demographic profile of Lusk illustrating an ever-growing population since 1991;*
- *Unchanged development boundaries of the town over the last three development plans including the draft Development Plan which is in contrast to the growing population and housing demand;*
- *Spatial distribution of recent developments in Lusk and pattern of growth in the town which expands in the northerly and easterly direction;*
- *Lusk’s strategic location and existing development pattern which enables it to be capable of accommodating future development and support the sustainable and compact growth of the town, as well as the economy of the surrounding area (especially rural clusters) which will benefit from the anticipated population growth.*
- *Consider the sequential extension of the existing boundary of Lusk to allocate additional lands zoned for future development in order to allow a compact and more sustainable growth of the town in a northern, eastern and southern pattern, given the town’s proximity to high quality public transport, employment bases, and existing services, as well as to a wide array of amenities and several parks (with a regional park within close proximity of the town).*
- *Encourage a compact sustainable growth of existing settlements at an appropriate density, with the provision of high-quality new housing served by an appropriate quantum of public spaces and community infrastructure.*
- *Consider the appropriateness of future housing provision within existing settlements located alongside the ‘Dublin-Belfast Economic Corridor’ and within approximately 1km of high-capacity public transport, in accordance with the policies and objectives of the Development Plan and national and regional planning policies such as the NPF and RSES.*
- *Noting the population distribution trend within Fingal and future cycle and open space provision, it is considered appropriate that the development boundary of Lusk be extended, and additional lands be zoned for future residential development.*



Location of the Lands

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DOWNEY

This planning submission is made in response to the statutory review of the Fingal County Development Plan. Stage 2, known as the 'Draft' stage, requires submissions to be of a site-specific nature. Accordingly, this submission has been prepared in the context of "Draft Fingal Development Plan" which sets out the vision for how Fingal should develop over the life of the Plan while ensuring compliance with national and regional policy. The Development Plan presents an opportunity for the general public to shape Fingal for the future when it comes to important issues such as housing, economic development, community and heritage. We would therefore respectfully request that Fingal County Council consider the content within this planning submission. Downey Planning would like to thank the Council for the opportunity to make this submission, on behalf of our clients whom are strategic landowners, business operators and residents of Fingal.

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1.0 INTRODUCTION

Downey, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this submission to the Draft Fingal County Council Development Plan 2023-2029. This submission is made on behalf of our client, Gannon Homes, in relation to the zoning objectives of the lands at Beau, Lusk, Co. Dublin.

This written submission is made in response to an invitation for comments from interested parties by Fingal County Council. This submission is being made within the specified timeframe for submissions i.e., 12th May 2022, as set out on the Draft Development Plan's public notice.

2.0 LEGISLATIVE BASIS

Section 9 of the Planning and Development Act 2000 (as amended) provides that, subject to the requirements set out in Section 9, 10 and 11 of the Act, that a planning authority must adopt a new Development Plan every six years. The contents of the Development Plan are set out within Section 10 of the Planning and Development Act 2000 (as amended) and must include a strategy for the proper planning and sustainable development of the area of the Development Plan and shall consist of a written statement and a plan or plans indicating the development objectives for the area in question. The process for the preparation of the draft Development Plan is contained within Section 11 of the Planning and Development Act 2000 (as amended) which states:

"11.—(1) Not later than 4 years after the making of a development plan, a planning authority shall give notice of its intention to review its existing development plan and to prepare a new development plan for its area.

(2) A notice under subsection (1) shall be given to the Minister, any prescribed authorities, any adjoining planning authorities, the Board, any relevant regional authority and any town commissioners and city and county development boards within the functional area of the authority and shall be published in one or more newspapers circulating in the area to which the development plan relates and shall—

(a) state that the planning authority intends to review the existing development plan and to prepare a new development plan,

(b) indicate that submissions or observations regarding the review of the existing plan and the preparation of a new development plan may be made in writing to the planning authority within a specified period (which shall not be less than 8 weeks),

(c) indicate the time during which and the place or places where any background papers or draft proposals (if any) regarding the review of the existing plan and the preparation of the new development plan may be inspected.

(3) (a) As soon as may be after giving notice under this section of its intention to review a development plan and to prepare a new development plan, a planning authority shall take whatever additional measures it considers necessary to consult with the general public and other interested bodies.

(b) Without prejudice to the generality of paragraph (a), a planning authority shall hold public meetings and seek written submissions regarding all or any aspect of the proposed development plan and may invite oral submissions to be made to the planning authority regarding the plan.

(c) In addition to paragraphs (a) and (b), a planning authority shall take whatever measures it considers necessary to consult with the providers of energy, telecommunications, transport and any other relevant infrastructure and of education, health, policing and other services in order to ascertain any long-term plans for the provision of the infrastructure and services in the area of the planning authority and the providers shall furnish the necessary information to the planning authority.

(4) (a) Not later than 16 weeks after giving notice under subsection (1), the manager of a planning authority shall prepare a report on any submissions or observations received under subsection (2) or (3) and the matters arising out of any consultations under subsection (3).

(b) A report under paragraph (a) shall—

(i) list the persons or bodies who made submissions or observations under this section as well as any persons or bodies consulted by the authority,

(ii) summarise the issues raised in the submissions and during the consultations, where appropriate,

(iii) give the opinion of the manager to the issues raised, taking account of the proper planning and sustainable development of the area, the statutory obligations of any local authority in the area, and any relevant policies or objectives for the time being of the Government or of any Minister of the Government, and (iv) state the manager's recommendations on the policies to be included in the draft development plan.

(c) A report under paragraph (a) shall be submitted to the members of the planning authority, or to a committee of the planning authority, as may be decided by the members of the authority, for their consideration.

(d) Following the consideration of a report under paragraph (c), the members of the planning authority or of the committee, as the case may be, may issue directions to the manager regarding the preparation of the draft development plan, and any such directions must take account of the statutory obligations of any local authority in the area and any relevant policies or objectives for the time being of the Government or of any Minister of the Government, and the manager shall comply with any such directions.

(e) Directions under paragraph (d) shall be issued not later than 10 weeks after the submission of a report in accordance with paragraph (c).

(f) In issuing directions under paragraph (d), the members shall be restricted to considering the proper planning and sustainable development of the area to which the development plan relates.

(5) (a) The manager shall, not later than 12 weeks following the receipt of any directions under subsection (4)(d), prepare a draft development plan and submit it to the members of the planning authority for their consideration.

(b) The members of a planning authority shall, as soon as may be, consider the draft development plan submitted by the manager in accordance with paragraph (a).

(c) Where the draft development plan has been considered in accordance with paragraph (b), it shall be deemed to be the draft development plan, unless, within 8 weeks of the submission of the draft development plan under paragraph (a), the planning authority, by resolution, amends that draft development plan."

This submission to the pre-draft of the Development Plan is being made in accordance with Section 11(2)(b) and 3(b) of the Planning and Development Act 2000 (as amended) and is being submitted within the specified timeframe (12th May 2022) as set out in the Draft Fingal Development Plan 2023-2029 public notice.

3.0 SITE LOCATION & DESCRIPTION

The subject lands, which extend to approximately c.10.72 hectares, are located on the eastern side of Lusk. The lands are bounded to the north by the R128 Road, to the south and east by greenfield and to west by Rush and Lusk Train Station along with some one-off housing type residential dwellings.

The lands are also in close proximity to the Rush-Lusk train station, which is just circa 550m away and is a 2-minute driving distance via R128 and 3-minute cycling distance from the site.



Figure 1. Aerial View of the Application Site (approximate boundaries of the subject site outlined in red)

4.0 PLANNING HISTORY

Downey have carried out a detailed examination of the planning history of the subject site, which determined that there have been one planning application made on the subject lands and one adjacent to the lands. The details of these applications have been summarised as follows:

- **Reg. Ref. F07A/0187-** By order dated 9th November 2007, Fingal County Council granted permission for Conversion of house (a Protected Structure) to one 4-bedroom two storey dwellinghouse and two 3 bedroom apartments with internal alterations, removal of lean-to greenhouse to eastern end and demolition, extension and alteration of western end of existing structure to include a single storey conservatory with associated external alterations and repaving of forecourt for car parking. Change of use and alteration and extension of farm buildings comprising demolitions, single and two-storey extensions and insertion of windows, other facade alterations, re-roofing and re-rendering of walls, replacement of windows to contain 4 self-contained two-storey dwelling houses one with 3 bedrooms, two with 4 bedrooms and one with six bedrooms. Associated siteworks and external areas including communal car parking. Demolition of part of single-storey gate lodge, construction of new extension, external alterations, re-roofing, replacement windows, to provide a single storey 2-bedroom dwelling house with associated external works and landscaping. Re-opening of existing vehicular service road from main road, widening entrance and service road to provide new internal driveway including associated demolition of certain farm walls and construction of new boundary walls, internal wall and associated landscaping. Installation of mechanical sewage treatment plant and percolation bed with associated external works.

5.0 PLANNING CONTEXT

5.1 Project Ireland 2040: National Planning Framework

The National Planning Framework (NPF) is *“the Government’s high-level strategic plan for shaping the future growth and development of our country out to the year 2040”*. It is a Framework to guide public and private investment, to create and promote opportunities for our people, and to protect and enhance our environment- from our villages to our cities and everything in between. It is stated within the NPF that, *“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 NPF states that, *“the long-term vision for Ireland’s housing future aims to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future.”* The NPF acknowledges the unique and complex nature of Ireland’s urban structure and accordingly suggests the need for a range of complementary strategies in the context of planning for future growth.

In order to achieve more balanced and sustainable development, some settlements will need to attract increased population, whereas others will need more jobs, amenities or better transport links. The policy document goes on to add that some of settlements require a combination of these, but all

will require a tailored approach, that can be appropriately linked to investment. As per, the NPF supports:

- There is a need to encourage population growth in towns of all sizes that are strong employment and service centres, where potential for sustainable growth exists, also supported by employment growth;
- There is a need to reverse the stagnation or decline of many smaller urban centres, that may include the identification and establishment of new roles and functions and enhancement of local infrastructure and amenities;
- There is a need to address the legacy of rapid unplanned growth in expanded commuter settlements of all sizes, by facilitating amenities and services catch-up, jobs growth and/or improved sustainable transport links to the cities, together with a much slower, more sustainable rate of population growth than in recent decades;
- In more self-contained settlements of all sizes, with a good balance of people and jobs, there is a need to continue balanced population and employment growth.

Outlined in **NPO 7**, it is therefore an objective of NPF to:

“Apply a tailored approach to urban development, that will be linked to the Rural and Urban Regeneration and Development Fund, with a particular focus on:

- *Dublin;*
- *The four Cities of Cork, Limerick, Galway and Waterford;*
- *Strengthening Ireland’s overall urban structure, particularly in the Northern and Western and Midland Regions, to include the regional centres of Sligo and Letterkenny in the North-West, Athlone in the Midlands and cross-border networks focused on the Letterkenny-Derry North-West Gateway Initiative and Drogheda-Dundalk-Newry on the Dublin-Belfast corridor;*
- *Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth;*
- *Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities;*
- *Addressing the legacy of rapid unplanned growth, by facilitating amenities and services catch-up, jobs and/or improved sustainable transport links to the cities, together with a slower rate of population growth in recently expanded commuter settlements of all sizes;*
- *In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.”*

Outlined **NPO 18a**, it is an objective of the NPF:

“To 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.”

Additionally, a key planning policy of the NPF for the Eastern and Midland Region (pg. 35) seeks:

“Enabling the complementary development of large and county towns in the wider Greater Dublin Area and Midland areas on the key strategic and public transport routes in a regionally co-ordinated manner, with an enhanced emphasis on measures to promote self-sustaining economic and employment-based development opportunities to match and catch-up on rapid phases of housing delivery in recent years”.

With respect to the above, the proposed re-zoning of the lands to provide for housing delivery in Lusk is suggested to be consistent with the NPF by the reason of location and close proximity to Rush and Lusk Train Station which provides high quality high-capacity travel to Dublin City.

5.2 Project Ireland 2040: National Development Plan 2021-2030

Project Ireland 2040 National Planning Framework (NPF), which sets the overarching spatial strategy for the next twenty years, includes the National Development Plan, which sets out the ten-year investment strategy. The recent Review of the NDP was led by the National Investment Office in the Department of Public Expenditure and Reform and was structured in two phases with associated outputs.

The review was founded upon a strongly evidence-based approach, building upon the extensive data and analyses that have been produced by the NIO and by the work of IGEES and other policy units across other Government Departments and agencies, including other newly commissioned and targeted research. The NDP sets out funding to underpin key Government priorities. Specifically, allocations will support the realisation of critical goals laid out in Housing for All and will enable a step-change in investment to ameliorate the effects of climate change.

Outlined in the NDP, the key achievements of NPF over 2018-2021 and in relation to housing includes delivery of over 63,000 homes and 26,256 new social housing homes. To underpin NPF population targets, a detailed assessment of structural housing demand identifies demand for almost 400,000 new homes in Ireland between 2020 and 2031, or 33,000 new homes per annum. At city and county level, this is broken down to form a Housing Supply Target (HST) for each local authority area, to guide planning for future development.

The NPF housing supply target has been refined to reflect recent (2020) ESRI research based on NPF population growth, taking into account both existing demand and a legacy of undersupply to date. There is now a need to accommodate around 600,000 new households by 2040, with the Department of Housing planning to deliver an average of 33,000 homes per annum to 2030 including an average of 10,000 new social homes each year and an average of 6,000 affordable homes each year.

Set out in the NDP, public capital investment must, as a top priority, support the delivery and location of the homes that society will need over the next decade and beyond, while also ensuring that in the future the pattern of housing development underpins the development of more compact higher-density cities, towns, and other areas. It is also a priority to enable infill development, with up to 50% of future housing in our cities and major urban centres and 30% elsewhere to be provided within existing built-up areas serviced by existing facilities and along high-capacity public transport corridors.

With respect to the above-mentioned, the re-zoning of the subject lands which inherently appears as the next destination of development in the eastern fringe of Lusk, is considered to keep with the NDP, i.e., by assisting in delivery of housing target within an active area in terms of construction.

5.3 Housing for All: A New Housing Plan for Ireland

The Housing for All: A New Housing Plan for Ireland states that Ireland's housing system is not meeting the needs of enough of our people, and therefore, it needs to increase new housing supply to an average of at least 33,000 new units per year over the next decade. This will include over 10,000 social homes each year over the next five years, with 9,500 of these being new-builds, and an average of 6,000 affordable homes for purchase or rent. As per, Housing for All provides four pathways to achieving four overarching objectives:

- Supporting home ownership 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.

Outlined in the Plan, the State must act decisively to increase supply of both private and public housing. An average of 33,000 homes must be provided every year between now and 2030. Increased housing output is needed in all sectors - private, affordable, and social - to meet the needs of people in a wide variety of circumstances.

It is submitted that the provision for residential units on the subject lands would help the Government to achieve the objectives of the Housing for All Plan by unlocking lands in an area with an active profile of construction and residential developments. Thus, it is submitted that the proposed development is consistent with the development framework in this regard.

5.4 The Housing Agency Statement of Strategy 2022-2024

Launched in late January 2022, the Housing Agency's Statement of Strategy, outlines how more affordable housing, increasing the supply of social and private homes and addressing social inclusion issues such as homelessness and ageing will be the priorities for the work of The Housing Agency over 2022-2024. The Statement of Strategy frames the work of The Housing Agency under three broad themes:

- Being a centre for housing knowledge;
- Bridging housing supply and demand; and,
- Building capacity for housing.

It also outlines how, over the coming years, the Housing Agency will use research, informed policy insights and data to work *“to achieve a housing system that meets the housing needs of the nation and promotes viable, sustainable communities”*.

The Housing Agency’s Strategic Plan 2022-2024 has been framed in the context of supporting Housing for All, the Government’s housing plan for Ireland and key trends in the housing system including:

- Diverse and changing housing needs for people living in Ireland.
- Long-term government policy and strategic planning for the Irish housing system.
- A continuing focus on building inclusive, sustainable communities.

It is submitted that the evidence-based approach outlined in Section 7 of this submission is consistent with the overarching strategy of the Housing Agency, where sequential development of Lusk on its eastern fringe is suggested by bringing forward the lands with greater potential with regards to the context and its wider surrounding, locational attributes, and deliverability of the lands over the lifetime of the Development Plan.

5.5 Regional Spatial and Economic Strategy 2019-2031 (RSES)

The Regional Spatial and Economic Strategy (RSES) was published by the Eastern and Midland Regional Assembly. The RSES outlines the long-term regional level strategic planning and economic framework in support of the National Planning Framework for the period 2019-2031, by identifying regional assets, opportunities, pressures and constraints and providing a framework for investment to better manage spatial planning and economic development throughout the Eastern & Midland Region.

With a vision *“to create a sustainable and competitive Region that supports the health and wellbeing of our people and places, from urban to rural, with access to quality housing, travel and employment opportunities for all”*, the RSES, in conjunction with the NPF, predicts Dublin City and suburbs to experience continued population growth over the period 2019-2031 with a predicted increase of 220,000.

The NPF targets 50% of all housing to be provided within or contiguous to the built-up area of Dublin city and suburbs. In order to combat and provide for compact residential development, the RSES outlines a number of key Regional Policy Objectives (RPOs) that pertain to the NPF targets. The key Regional Policy Objectives applicable to this submission are as follows:

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 3.3: *“Local authorities shall, in their core strategies, identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the ‘Sustainable Residential Development in Urban Areas’, ‘Sustainable Urban Housing;*

Design Standards for new Apartments Guidelines’ and the ‘Urban Development and Building Heights Guidelines for Planning Authorities’.”

The RSES states that, “a key National Strategic Outcome (NSO 1) in the NPF and Regional Strategic Outcome (RSO 2) in the RSES is the need to achieve ambitious targets for compact growth in our urban areas”. In order to achieve these targets and the delivery of new homes within the footprint of existing settlements, active land management responses are required to ensure that land and building resources within existing settlements are used to their full potential. This includes settlements within the Core Region, such as Lusk.

As per the RSES, “the Core Region includes the peri-urban ‘hinterlands’ in the commuter catchment around Dublin, which covers the Mid-East counties of Louth, Meath, Kildare and Wicklow, extending down the East Coast and into parts of the Midlands”, with more than 550,000 people residing in the Core Region (Census 2016). It is of worth noting that this Region “enjoys access to a high-quality environment, rich heritage and key tourism assets and attractions such as the coastline, the Royal and Grand Canals, the Boyne and Barrow Blueways, Tayto Park, UNESCO site at Bru na Boinne and Wicklow Mountains National Park.”

Furthermore, this Region “contains a strong network of county and market towns that have a good level of local employment, services and amenities, which serve not just their resident populations but a wider catchment area”, including Balbriggan and Drogheda, with towns having the capacity for continued sustainable growth to become more self-sustaining. In this regard, growth enablers for the Core Region include:

- To promote continued growth at more sustainable rates, while providing for increased employment and improved local economies, services and functions to allow towns to 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.
- ‘Catch up’ investment to promote consolidation and improvement in the sustainability of those areas that have experienced significant population growth but have a weak level of services and employment for their residents.
- Diversification and specialisation of local economies with a focus on clustering, smart specialisation, place making and urban regeneration to create the quality of life to attract FDI and indigenous investment and increase high value knowledge-based employment including second site and relocation opportunities.

These growth enablers are critical to Self-Sustaining Towns, particularly Lusk, a town capable of accommodating an influx of population, thus is able to provide ample opportunities for sustainable and compact growth, as well as benefitting from a strategic location within the Core Region noting the proximity to high quality infrastructure and diverse amenities, including a rich cultural heritage worthy of preservation.

As previously stated, the town of Lusk is served by a railway station, i.e., Rush and Lusk Train Station, benefits from a well-defined historic town centre and urban structure, as well as access to a wide range of amenities in the area, including regional parks, open spaces and recreational areas. As it stands, it is submitted that future residential development would be of great benefit to the town and surrounding environs, given the town's strategic location in the 'Dublin-Belfast Economic Corridor' which is identified as a strategic connection for the Region and represents the largest economic agglomeration on the island of Ireland.

5.6 Fingal Development Plan 2017-2023

Lusk is within the current Development Plan designated as a "Moderate Sustainable Growth Town", which as per the same, these settlements "*rely on the provision of quality local services and also serve as commercial nodes for their immediate rural environs as their location is more remote from higher order centres*".

However, in relation to retail offerings as reiterated in the Development Plan, "*it will be a priority to supplement the retail and local services offering in Lusk in order to provide for population growth in the town*". Outlined in **Objective SS20** of the Development Plan, the Council seeks to:

"Manage the development and growth of Lusk, Rush and Skerries in a planned manner linked to the capacity of local infrastructure to support new development."

Also, stated in the Development Plan, Lusk is an historic settlement with notable built heritage and a distinctive character which its long history of continuous settlement from pre-historic times resulted in a wealth of archaeology, traditional vernacular buildings, and medieval street pattern around the town core that is designated as ACA.

Considering the substantial population growth of Lusk, with rail connectivity to Dublin City effectively changing the demographic profile of the area, the dichotomy between preserving the historical core of Lusk and expansion of population put forward the consolidation of this settlement within its development boundaries. According to the **Objective LUSK 7** of the Development Plan, the Council seeks to:

"Ensure that existing and future development is consolidated within well-defined town boundaries to maintain the distinct physical separation of Lusk and Rush."

Therefore, the consolidation of Rush and the distinct physical separation of Rush and Lusk as separate towns is a fundamental principle of the development strategy as noted in the Development Plan.

With a remaining capacity of 43ha lands zoned to potentially deliver up to 1,218 no. dwellings from the previous Plan period, the current Development Plan does not provide for additional residential land, proposing an overall total of 38ha which is suggested to potentially deliver up to 1,020 no. dwellings.

Town/Village	Remaining Capacity (hectares)	Remaining Residential Units	Metropolitan Core % Land	Metropolitan-Core % Units
Metropolitan Area				
Key Town				
Swords	481	14,799		
Dublin City and Suburbs				
Blanchardstown	260	9,306		
Howth	14	436		
Baldoyle/Sutton	29	1,498		
Other Settlements*	66.5	2,320		
Other Metropolitan Areas				
Portmarnock	43	1,116		
Self Sustaining Growth Towns				
Donabate	101	3,532		
Self Sustaining Town				
Malahide	75.5	956		
Towns/Villages				
	92	844		
Total Metropolitan	1,162	34,806	76%	81%
Core Area				
Self-Sustaining Towns				
Balbriggan	134	3,805		
Rush	51.5	1,771		
Lusk	38	1,020		
Skerries	32.7	883		
Towns & Villages				
	101	818		
Total Core	357	8,298	24%	19%
TOTAL Fingal**	1,519	43,104	100	100

Figure 2. Total Residential Capacity provided extracted from the Fingal Development Plan 2017-2023 (Variation 2)

In terms of specific objectives regarding Lusk, **Objective LUSK 11** of the Development Plan seeks to: "Prepare and/or implement the following Masterplans during the lifetime of this Plan:

- North Lusk Masterplan (see Map Sheet 6A: MP 6.A)
- Minister's Road Masterplan (see Map Sheet 6A: MP 6.B)
- Station Road Masterplan (see Map Sheet 6A: MP 6.C)"

The Development Plan goes on to introduce the main elements of each Masterplan mentioned above.

The use classes which are principally permitted under RU zoning objective are summarised in the Table below, extracted from the Development Plan.

Agricultural Buildings ⁶	Agri-Tourism	Bed and Breakfast ³
Boarding Kennels ³	Burial Grounds ²⁹	Childcare Facilities ³
Community Facility ²	Extractive Industry/Quarrying	Farm Shop ²⁰
Golf Course	Guest House ³	Health Practitioner ³
Holiday Home/Apartments ⁷	Office Ancillary to Permitted Use	Open Space
Research and Development ¹⁴	Recreational Facility/Sports Club ²	Residential ⁴
Restaurant/Café ¹³	Sustainable Energy Installation	Utility Installations
Veterinary Clinic ²¹	Campsite ²⁵	

Figure 3. Use Classes Permitted in Principle under RU Zoning Objective

5.7 Lusk Vision 2030; Lusk for Life

‘Lusk Vision 2030: Lusk for Life’ is a community-led action plan for Lusk town. It was commissioned by Lusk Community Council in late 2020, with an initial submission to the Fingal Development Plan 2023-2029 consultation process in May 2021. It provides strategies and projects to deliver a positive future for all of the citizens of Lusk and will help guide and shape development in the next critical decade. Considering the non-statutory nature of this document, the reason to include it in the following submission is that the document touches upon recent developments in Lusk and by mapping out the opportunity sites across the town which can potentially contribute to the housing target of the settlements, provides a baseline for this submission.

As can be seen in the Figure below extracted from this document, central Lusk has been identified as an Architectural Conservation Area (ACA) and the void between ACA and development boundaries of the town has been filled up with mostly low-density residential estates.



*Figure 4. Left Photo: Location of Housing Estates Outside Town Core (ACA);
Right Photo: Over 700 no. Dwellings under Construction/in the Planning Process*

Outlined in the document, regional and national demand for increased housing supply has resulted in rapid growth of housing estates, and pressures to re-zone land for residential use continue in the current Development Plan consultation. Developer-led housing schemes have dominated the delivery of housing in the State, but towns such as Lusk suffer as community infrastructures- physical and social have not kept pace with the speed of housing expansion. In Lusk, this developmental pressure has seen a drive to continually revise the town boundary extending the town into its agricultural hinterland.



Figure 5. An Indicative Map of Lusk Developmental Pressures

The findings of this document are submitted to inform the following submission, and this is further discussed in the Section 7, where grounds to this re-zoning proposal have been outlined.

6.0 DRAFT FINGAL DEVELOPMENT PLAN 2023-2029

Lusk is within the draft Development Plan designated as a “Self-sustaining Town”, which as per the same, requires “*contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery. RSES envisages that population growth in these towns shall be at a rate that seeks to achieve a balancing effect and shall be focused on consolidation and inclusion of policies in relation to improvements in services and employment provision. Self-Sustaining Towns within Fingal are located in both the Metropolitan and Core Areas and comprise, Malahide, Portmarnock, Balbriggan, Rush, Lusk and Skerries.*”

The following provides those policies of the draft Development Plan concerning Self-sustaining Towns, including Lusk:

“Policy CSP33 – Consolidate Growth of Self-Sustaining Towns Consolidate the growth of Self-Sustaining towns including Malahide, Balbriggan, Lusk, Portmarnock, Rush and Skerries as set out in the Settlement Strategy for RSES and by encouraging infill development and compact growth rather than greenfield development and by intensification at appropriately identified locations.”

Policy CSP37 – Malahide, Balbriggan, Lusk, Portmarnock, Rush and Skerries Consolidate development and protect the unique identities of the settlements of Malahide, Portmarnock, Balbriggan, Lusk, Rush and Skerries.”

As detailed in the Core Strategy, with a remaining capacity of 27ha lands zoned to potentially supply 760 no. dwellings from the current Development Plan, the draft Development Plan proposes no change to the quantum of residential lands from the previous Plan period. It is noted that as per the Settlement Strategy of the draft Development Plan, this is to correspond to a population growth anticipated to be c. 324 persons over 2023-2029 to reach a population of 9,095 persons for Lusk by 2029. This is submitted to be c. 2.5% of the overall population estimated for Fingal by 2029.

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
	Rush		10,359	10,877	11,279	284	43	1,631
	Lusk		8,353	8,771	9,095	124	27	760
	Skerries	includes Loughshinny	10,266	10,779	11,178	180	15	373
Other Core Towns and Villages	Towns and Villages	includes Ballyboughal, Oldtown, Ballymadun, Garristown, Naul, Balscadden	4,439	4,617	4,753	90	80	745
Rural			7,121	7,263	8,650			

Figure 6. Total Residential Capacity provided extracted from the draft Fingal Development Plan 2023-2029

The draft Development Plan also highlights the historical background and distinctive character of the town, seeking to:

“Objective CS055 (Historic Core of Lusk) – Protect and conserve the special character of the historic core of Lusk including the area of archaeological notification in the centre of the town having regard to the physical and social character of the core area particularly in the vicinity of St. MacCullin's Church and Main Street, and to promote a conservation-led approach to the consolidation and redevelopment of the town core.

Objective CS058 (Maintenance of Distinct Physical Separation) – Lusk, Rush and Malahide Ensure that existing and future development within the settlements of Lusk, Rush and Malahide is consolidated within well-defined town boundaries to maintain their distinct physical separation.”

Also, the draft Development Plan introduces the Framework Plans, as non-statutory documents to be prepared for numerous areas throughout the County over the lifetime of the Plan. It is envisaged that the Framework Plans will include objectives and a programme of actions to maximise the development potential of these areas. It is noted that Lusk is one of the settlements subject to have a Framework Plan over the course of 2023-2029.

In relation to the proposed zoning objective of the lands in the draft Development Plan, similar to the current Development Plan, the lands are zoned as “RU – Rural” which seeks 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”*. As iterated in the Development Plan, the vision for this zoning objective is to:

“Protect and promote the value of the rural area of the County. This rural value is based on:

- *Agricultural and rural economic resources*
- *Visual remoteness from significant and distinctive urban influences*
- *A high level of natural features*

Agriculture and rural related resources will be employed for the benefit of the local and wider population. Building upon the rural value will require a balanced approach involving the protection and promotion of rural biodiversity, promotion of the integrity of the landscape, and enhancement of the built and cultural heritage.”

The use classes which are principally permitted under RU zoning objective are summarised in the Table below, extracted from the Development Plan

Agricultural Buildings ⁶	Agri-Tourism	Bed and Breakfast ³
Boarding Kennels ³	Burial Grounds ²⁹	Campsite ²⁵
Childcare Facilities ³	Community Facility ²	Farm Shop ²⁰
Golf Course	Guest House ³	Health Practitioner ³
Holiday Home/Apartments ⁷	Industry – Extractive / Quarrying	Office Ancillary to Permitted Use
Open Space	Research and Development ¹⁴	Recreational/Sports Facility ²
Residential ⁴	Restaurant/Café ¹³	Utility Installations
Veterinary Clinic ²¹		

Figure 7. Use Classes Permitted in Principle under RU Zoning Objective

7.0 JUSTIFICATIONS & GROUNDS OF SUBMISSION

This submission is proposing a re-zoning of the lands located off Skerries Road, Lusk, Co. Dublin to “**RA - Residential Area**” which seeks to “**Provide for new residential communities subject to the provision of the necessary social and physical infrastructure**”. The following provides the grounds and justifications to the proposed submissions.

7.1 Demographic Profile of Lusk

According to Census data, Fingal remains the third most populous local authority in Ireland (after Dublin City and Cork County) with a total of 296,020 residents in 2016 and accounting for 22% of Dublin's overall population. Between 2006 and 2016, the population of Fingal increased by 23.3% or by just over 56,000 people. The county saw a population growth of 8% since the preceding Census in 2011 (22,029 persons), a growth rate which was considerably higher than the national average growth rate of 3.8% for the same period.

The NPF estimates that the population of the county will grow by 490,000-540,000 by the year 2040. In line with this, the EMRA RSES has a projected target growth for Fingal of between 340,000-349,000. Since the publication of the RSES, EMRA has allocated Fingal a population (high) of 369,000 for 2031 as per the MASP transitional population document. This includes the MASP allocation of an additional 20,000 for Swords. This will see Fingal's population increase to 369,000 by 2031.

The aforementioned upwards trend is also present in the Electoral Division of Lusk (ED 028), where the population recorded an ever-increasing trend since 1991. As it can be traced in the Figure below, the population of Lusk increased from 7,022 in 2011 to 7,786 in 2016, which provides for a growth rate of 10.9% over the intercensal period (1.8% annual growth rate).

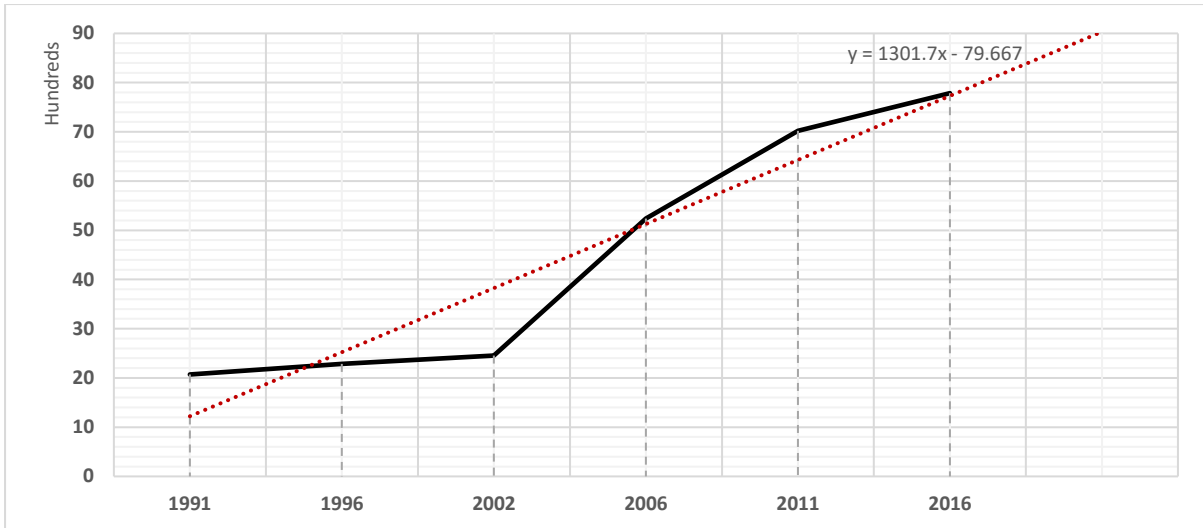


Figure 8. Population and its Changing Trends in Lusk since 1991

From the existing demographic trends, it is evident that there is a steadily growing demand for housing in Lusk. Utilising a linear population projection model and assuming a continuation of 2011-2016 population growth providing for a growth rate of 1.8% per annum, as specified below, an overall total of 9,835 persons is anticipated to reside in Lusk by 2029. This is submitted to be +740 persons above what is projected in draft Development Plan (9,095 persons by 2029).

Table 1. Projected Population for Lusk when Utilising a Linear Projection Model

Year	Population	Annual Population Increase during Year	Annual Population Increase 2023-29	Total Population Increase 2023-29	Total Population Increase 2017-29
2011	7,022	-	-	-	-
2016	7,786	10.9%	764	-	-
2017	7,927	1.8%	141	-	-
2018	8,071	1.8%	144	-	-
2019	8,217	1.8%	146	-	-
2020	8,366	1.8%	149	-	-
2021	8,518	1.8%	152	-	-
2022	8,672	1.8%	154	-	-
2023	8,830	1.8%	157	-	-
2024	8,990	1.8%	160	-	-
2025	9,153	1.8%	163	-	-
2026	9,319	1.8%	166	-	-
2027	9,488	1.8%	169	-	-
2028	9,660	1.8%	172	-	-
2029	9,835	1.8%	175	1,163	2,049

Moreover, the spatial distribution of population residing in Lusk, as mapped out below, shows a semi-radial pattern of growth, primarily formed around the core area of the town and then framed by the Lusk Ring Road (R127) to the east. The development is then spreads out in the western boundaries of the town with notably lower densities, which appears as contrary to the principals of compact growth and sustainable development underpinned by the development plans. The map also reveals a more moderate density per square kilometre for the town centre (1,668 persons/km²) and higher densities

in the outer layer (5,847 to 10,858 persons/km²), which is suggested to be primarily a result of already established areas in the town centre and the historical preservation of central Lusk which essentially restricts higher density developments in this area.

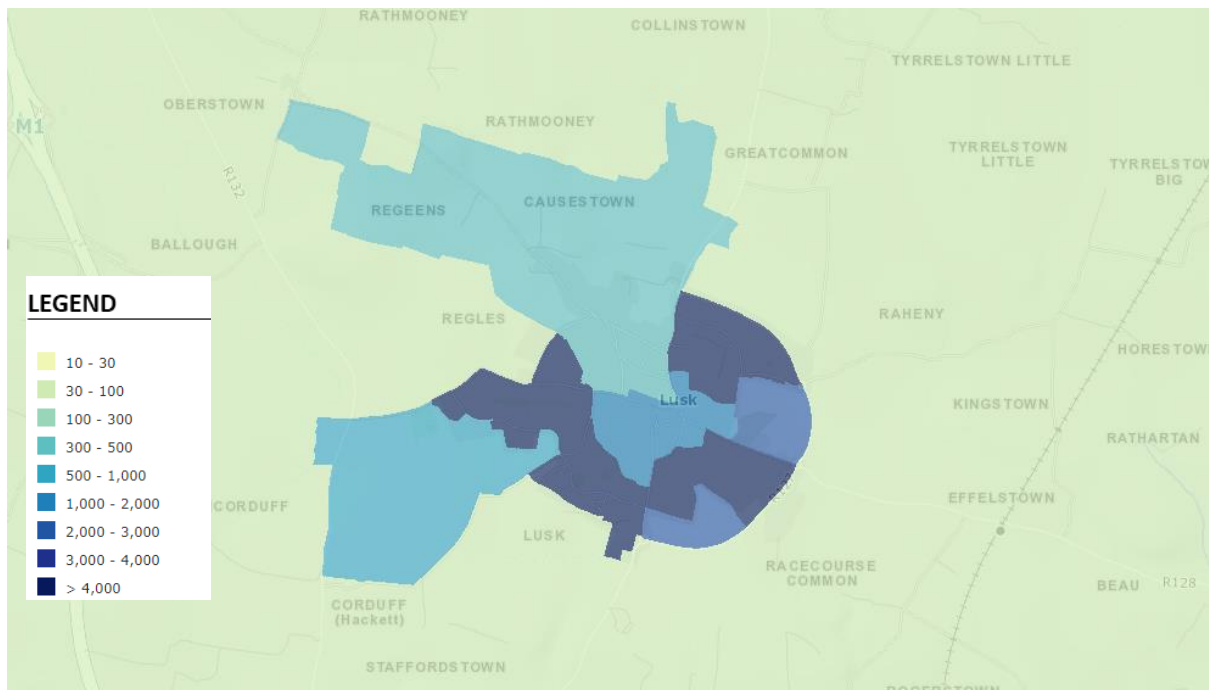


Figure 9. Spatial Distribution of Population Density per Km² in Lusk, 2016

As mentioned earlier, the draft Development Plan projects that Lusk population will stand at 8,771 people by 2023 and 9,095 people by 2029 which as can be seen are lower than what estimated here utilising a linear method. It is also noteworthy to mention as per the draft Development Plan table, the baseline population utilised in the estimation (Census 2016 result) is 8,353 people that is not clear where it is taken from. Extracted from the CSO StatBank (E2016), the population of Lusk in 2016 stood at 7,786 people. This indicates discrepancies in population projection for the town, which in the context of housing planning and considering the legacy of under-supply, can effectively skew the housing delivery in the town.

It is important to note that while these figures are useful indicators of past trends, they are entirely problematic when used to project future growth, in particular when considering the most recent changes, including occurrence of COVID-19 pandemic which effectively changed demographic movements and choice of accommodation in a long-lasting manner that is expected to reflect in the land use zoning and pattern of development in the coming years.

It is also noteworthy to mention that the most recent geo-political conflicts and massive displacement of the Ukrainian people is expected to have a further impact on the immigration levels to Ireland, surging the need for revising the population targets, housing demand, and means of delivering for this emerging need.

Thus, in the context of the soon-to-be-published 2022 Census, it is expected for these targets to be re-assessed to provide for real-time planning policy. To address these issues, Downey advises that the draft Plan should be revised to take account of the following points and any consequential

amendments to the housing strategy should be incorporated into the draft Plan during the Amended Draft Development Plan Stage (expected to be c. November 2022):

1. The 2022 Census is scheduled for full publication in April 2023 and, based on the current timetable for adoption ('early 2023'), the draft Plan will be brought into force without this up-to-date census information. This means that the Plan will fail to align with its demographic base over the vast majority of its plan period. To address this issue, the Plan's population figures should be assessed against the preliminary census information due to be published on 24th June 2022 and an early review of the Plan should be conducted to reflect the final census information. The Amended Draft Development Plan (scheduled for public consultation in November 2022) should build in the requisite flexibility to ensure this alignment.
2. Downey further notes that by the end of May 2022, it is estimated that 33,000 Ukrainian refugees will have arrived in Ireland and the Government has confirmed that there is no cap on the number of refugees that can enter the country. An interdepartmental government committee has been set up to manage the housing arrangements arising. The implications of the resettlement programme on the draft Plan should be tested, to assess the downstream impacts on the private housing market and considered as part of the Amended Draft Development Plan (November 2022).

7.2 Recent Developments & Direction of Growth

In recent years, there have been several notable developments approved and/or under construction within Lusk, as illustrated below, with a considerable quantum of additional residential units also currently being proposed and/or pending a decision.



Figure 10. Sequencing of Large-scale Residential Applications in the Area

An overview of the applications on housing provision in the area expects that an overall total of c. 837 no. units to be potentially delivered in Lusk by 2023. This includes Regles SHD providing for 312 no. dwellings (TA06F.313144 - pending decision), North Kilhedge Lane providing for 54 no. dwellings (F16A/0577), Dublin Road & Barrack Lane providing for 10 no. dwellings (PARTXI/004/20 - granted permission), Station Road SHD providing for 230 no. dwellings (PL06F.247787 - granted permission), Rathmore Road & Lusk North Park at Clonrath Avenue development providing for 84 no. dwellings (F20A/0523 - granted permission), Great Commons development providing for 17 no. dwellings (F15A/0111 - granted permission + granted extension of permission), Clonrath Avenue development providing for 39 no. dwellings (F18A/0646 - granted permission), Rathmore Road & Skerries Road development providing for 41 no. dwellings (F18A/0197 - granted permission), and Raheny Lane development providing for 50 no. dwellings (F18A/0645).

As shown above, most recent residential developments within Lusk are mostly directed towards north and northeast of Lusk, which considering the location of Lusk-Rush train station is suggested to be a more sustainable direction for future development of the town, as it facilitates mutual consistency of land use planning and transport planning by supporting modal shift. This is further discussed in the following.

7.3 Land Availability within Development Boundaries of Lusk

As stated in the RSES, *“Self-Sustaining Towns are towns that require contained growth, focusing on driving investment in services, employment growth and infrastructure whilst balancing housing delivery”*. In this regard, identification of available lands within legislative boundaries of settlements is suggested to be the first step towards achieving a compact and smart pattern of growth.







A review of the available lands for residential developments in Lusk, as illustrated below, shows that there is a limited quantum of zoned lands which are available for the provision of housing, however, the next step to ensure housing delivery in a timely manner is to determine dynamic of these lands.



Figure 11. An Audit of Available Lands within Development Boundaries of Lusk

The Figure above is suggested to be read in conjunction with the following Table, where relevant details of the available lands have been summarised.

Table 2. Details of Available Lands Identified in Figure 13

MAP KEY	SITE NO.	REG. REF.	STATUS	NO. UNITS / DENSITY	SITE AREA
	1	F16A/0577 Applicant: Modelwave Limited	Permission Granted by Fingal County Council; 13 Sep 2017	51 no. dwellings (36.4 units/ha)	1.4 ha
	2	F18A/0200 (ABP Ref. ABP-302027-18) Applicant: Conor & Philippa O'Dowd Neé - White	Permission Refused by Fingal County Council and ABP; 08 Nov 2018	1 no. dwelling	0.1932 ha
	3	Regles SHD (TA06F.313144) Applicant: Dwyer Nolan Developments LTD	(1) Pending a decision	(1) 312 no. units (37.6 units/ha)	(1) 8.3 ha
	4	F18A/0551 Applicant: Paul Carroll	Permission Refused by Fingal County Council; 26 Jun 2019	40 no. dwellings (31.4 units/ha)	1.27 ha
	5	N/A	Available / 'RS – Residential' Zoning Designation	N/A	N/A
	6	N/A	Available / 'RS – Residential' Zoning Designation	N/A	N/A

	7	F18A/0646 Applicant: Rimford Developments Ltd.	Permission Granted by Fingal County Council; 19 Dec 2019	41 no. dwellings (12.9 units/ha)	3.18 ha
	8	N/A	Available / 'RS – Residential' Zoning Designation	N/A	N/A
	9	F18A/0645 Applicant: Station Construction Ltd.	Permission Granted by Fingal County Council; 19 Dec 2019	62 no. dwellings (12.3 units/ha)	5.038
	10	N/A	Available / 'RS – Residential' Zoning Designation	N/A	N/A
	11	F20A/0523 Applicant: Rimford Developments Ltd	Decision to Grant Permission by Fingal County Council; 30 Apr 2021	91 no. dwellings (26 units/ha)	3.5 ha
	12	N/A	Available / 'RS – Residential' Zoning Designation	N/A	N/A
	13	F15A/0565 (ABP Ref. PL06F.247787) Applicant: Station Construction Ltd.	Permission Granted by Fingal County Council and ABP; 21 Jul 2017	153 no. dwellings (21.2 units/ha)	7.2 ha

It is important to note that many of these permissions have commenced or are completed, including at Sites 7,9 and 13.

However, timelapse maps of Lusk since 2005, as shown below, indicates that despite availability of these lands which have been designated for housing delivery in the preceding development plans, there is a lack of progression. On the contrary, the pattern of growth mostly confirms a concentration of developments along the Lusk Ring Road (R127) in both northerly and easterly directions.



Figure 12. Timelapse Maps of Lusk since 2005

With respect to the foregoing, it is submitted that the historical and logical form of development in Lusk is to expand in the northerly and easterly direction in a planned manner to also to maintain the distinct physical separation of Lusk and Rush. As such, the subject lands are spatially sequential to the existing pattern of growth in Lusk.

7.4 Sequencing of Lusk Zoning Objectives

As a general principle, the zoning strategy aspires to promote the orderly development of a settlement within its legislative boundaries by eliminating potential conflicts to establish an efficient basis for investment in different sectors in a settlement. In the case of Lusk town, a thorough review of the sequencing of zoning strategy since 2005 Fingal Development Plan, as illustrated below, shows a notable change when moving forward from 2005 Development Plan to 2011 Development Plan, however, no substantial changes to the legislative boundaries of the town can be observed.

To be more precise the draft Development Plan maintains the same town boundaries as 2011 Development Plan, which considering the ever-growing population of the town, it appears as increased levels of residentially zoned lands in the preceding plans is a result of constant re-zoning of inner lands.

With respect to the profile of the town characterised as a commuter town that requires a tailored planning approach where achieving a balance of people and jobs is prioritised, it is suggested that cutting down non-residential lands within the town to provide for housing would not assist in a sustainable pattern of growth in Lusk.

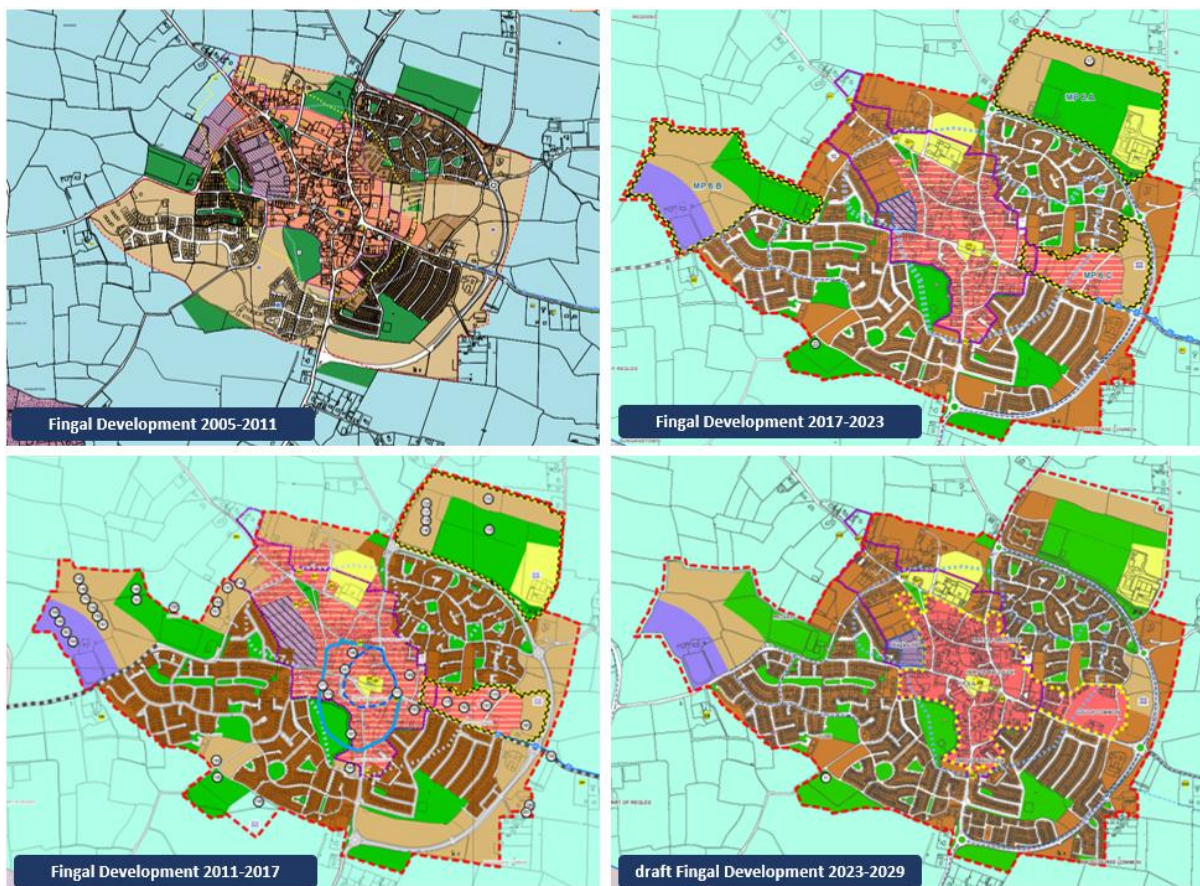


Figure 13. An Overview of Zoning Strategy in Lusk Since 2005 Development Plan

In light of the above, it is suggested that re-assessing the planning policy against land availability and deliverability in Lusk would provide for a revised legislative boundary where landowners are also actively seeking planning permissions. This not only serves zoning strategy of the Development Plan more efficiently, but also promotes accessibility to the Lusk-Rush train station which allow for an integrated town planning and transportation planning.

7.5 Accessibility, Connectivity & Zoning of Lands

When addressing the location of housing developments, *“the key purpose of the Core Strategy is to ensure that an appropriate amount of land is reserved in the right locations to meet housing and population targets”*. Future homes are required to be located where people have the best opportunities to access a high standard quality of life and can be built with the services and facilities to support them by ensuring that an appropriate quantum of zoned land is available at the right locations.

It is important to note that the Fingal Settlement Hierarchy supports the continued growth of Dublin as the Region’s economic engine advocated by the RSES. This hierarchy, alongside the compact growth objectives set out in national and regional policy, *“seeks to deliver sustainable growth of the Metropolitan Area through the Dublin Metropolitan Area Strategic Plan and to develop a number of key complementary growth settlements of sufficient scale to be drivers of regional growth”*.

The overarching hierarchy of settlements will then accommodate an agreed quantum of future development appropriate to its respective position in the hierarchy. In this regard, national and regional policy aim to prioritise the location of new housing provision in existing settlements as a means to maximising a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure.

It is also worth noting that the existing transport infrastructure in Lusk supports active travel and alternative sustainable modes of transport, such as railways. The town is served by the Rush & Lusk Train Station, forms part of the future provision of the Rush to Lusk Cycleway and benefits from accessibility to a wide range of local services. Additional housing provision to the immediate outskirts of the town would be of benefit to the area and support sustainable gradual growth.

The Strategic Issues Paper indicates that, *“providing well-serviced, well-connected towns, villages and communities is a key aim of Fingal County Council”*. It further states that, *“the next Development Plan will aim to promote ease of movement throughout Fingal by integrating and enhancing existing areas as well as those settlements identified for growth, by promoting high quality connectivity through the delivery of footpaths, segregated cycling facilities, public transport systems, and high-quality roads”*.

Improvements in the existing accessibility and connectivity within the Core Region are expected, given the planned infrastructure investments for Fingal (i.e., MetroLink, BusConnects, the Greater Dublin Area Cycle Network Plan, the DART+ programme, expansion of the LUAS network), this presents an opportunity to transform the existing relation between towns and promote active travel within Fingal.



Figure 14. Public Transport Network 2027 (NDP), Future Electric/Diesel Hybrid Rail for Lusk

It is also submitted that on foot of the draft Great Dublin Area Transport Strategy 2022-2024; Swords Development Area which is said to be adopted by December 2022, improved level of connectivity of Lusk is expected. This includes the X76 Xpresso route and the local L85 route along the M1 southwards to J4 at the intersection with the R132 and on the northbound stretch towards Lusk and Rush.

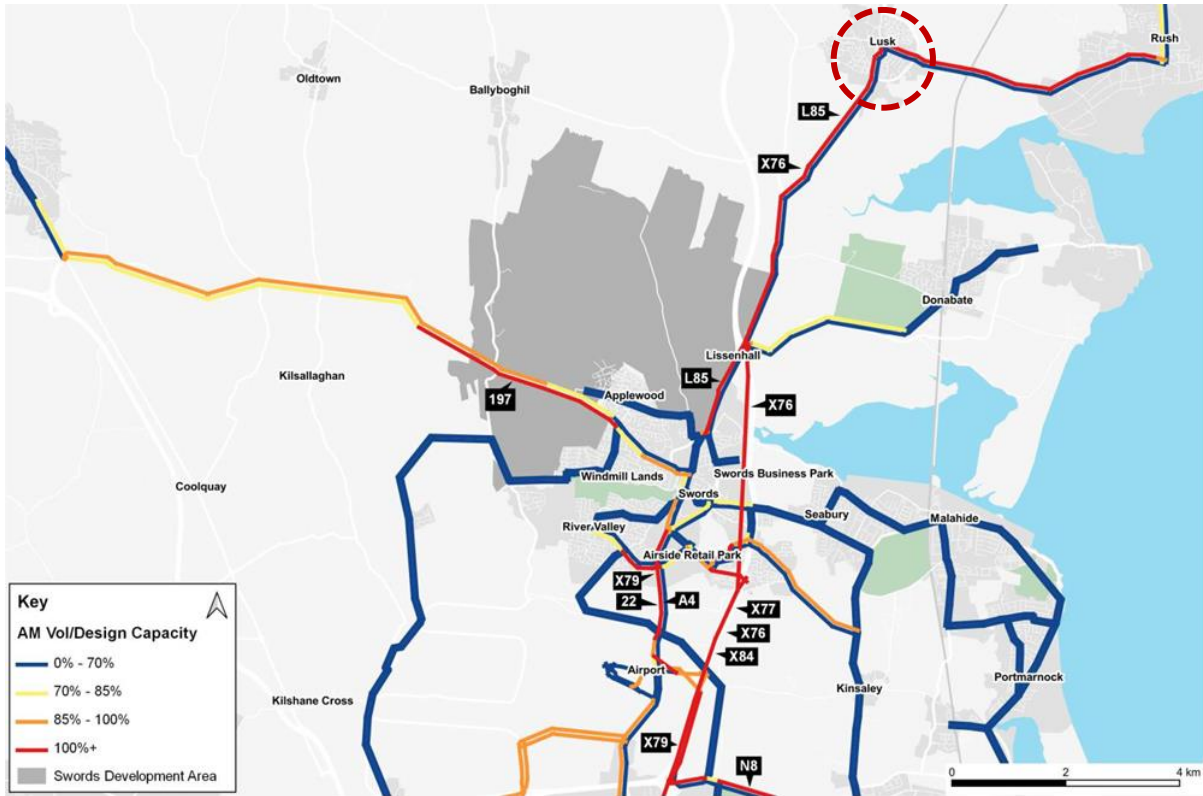


Figure 15. Proposed Capacity utilisation of Bus Routes extracted from the draft GDA Transport Strategy



Figure 16. Buffer Zones Determined from Rush & Lusk Train Station

As illustrated above, the Rush and Lusk Train Station is located c. 550m away from the development eastern boundary of Lusk. This is illustrated as a purple buffer zone on the existing street network. This would also confirm that pushing development boundaries of Lusk further to east and north would not have an adverse impact on consolidation of development boundaries for both Rush and Lusk and

still maintains the physical separation distance of both towns. In addition, the proposed cycle link within the current Development Plan, which facilitates connection between the train station and Lusk would allow for an integration of town planning and transportation planning in the area.

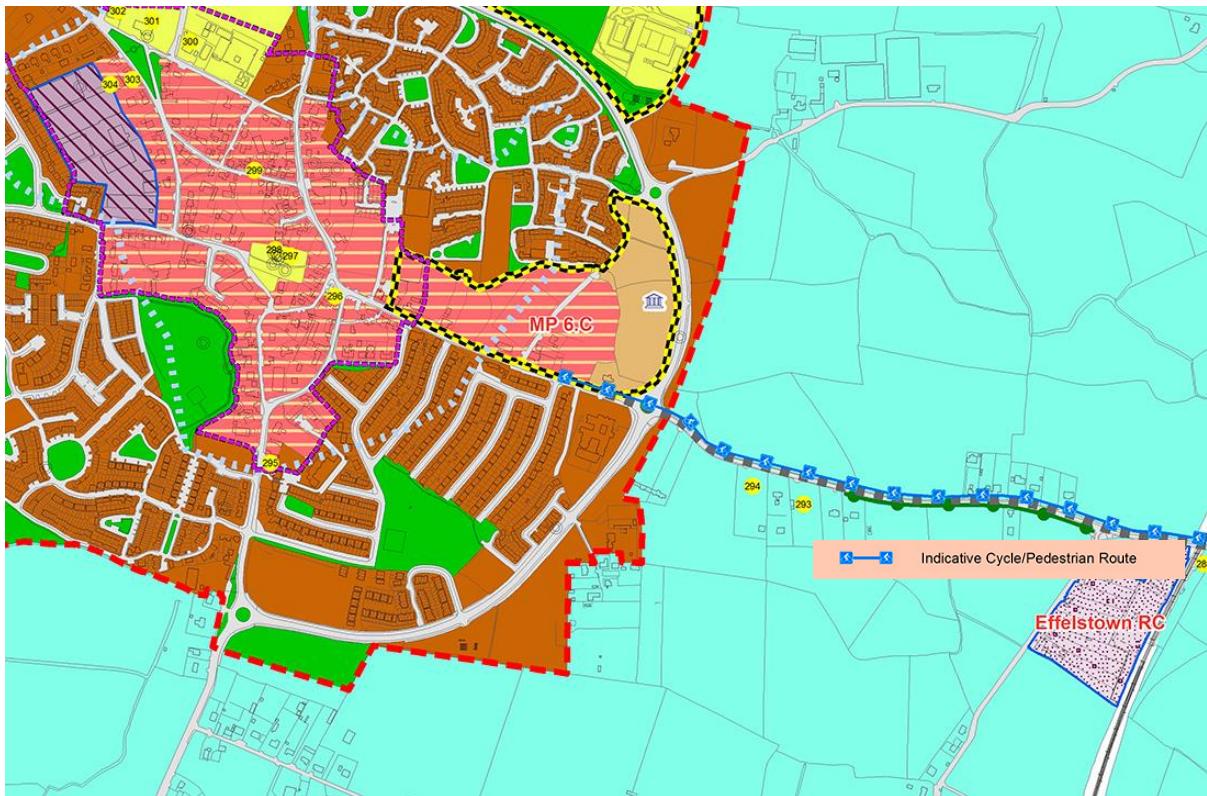


Figure 17. Fingal Development Plan 2017-2023, Rush to Lusk Cycleway fragment

In light of the above, Downey are of the professional opinion that Lusk has the potential to accommodate future development given its location close to high-capacity public transport, services and employment opportunities, and the provision of social and community infrastructure, as well as future infrastructure projects for the area. The provision of additional housing in accessible locations, such as within proximity to Rush and Lusk Train Station, will allow further people to access these services and further promote active travel, thus supporting Fingal's ambitious sustainable transport and active travel objectives.

7.6 Active Travel & Open Spaces

In addition to the increasing demand for housing in Fingal, it is of worth emphasising the transformation the County is undergoing. This needs to be taken into consideration for further allocation of land-uses across Fingal's towns and settlements, which are bound to see vital changes to the existing infrastructure for the next Plan period.

At a national level, cycle routes and greenways are being built to support active travel and provide increased permeability across towns, as well as promoting tourism and expanding the existing quantum of recreational areas and ancillary facilities. In this regard, the town of Lusk forms part of the Greater Dublin Area Cycle Network Plan and is located at a strategic point in close proximity to Rogerstown Park and coastal greenway, which will accentuate the town's attractiveness as a place to live, work and visit.

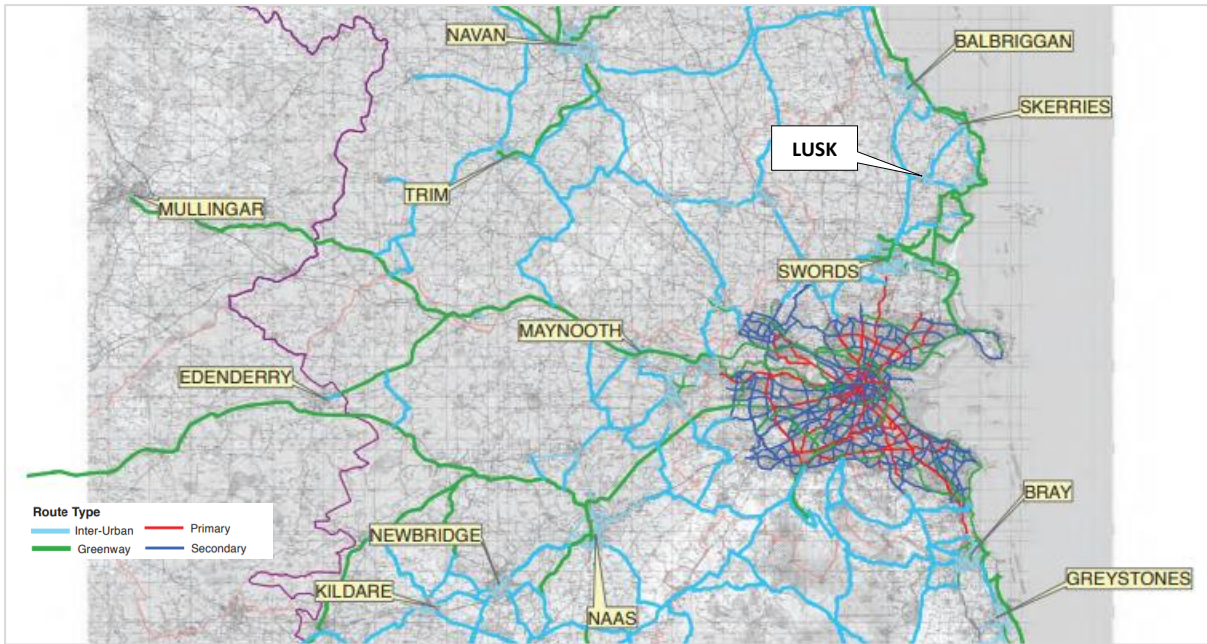


Figure 18. GDA Regional Cycle Route Network (NTA, 2013)

As shown in the Figure above, Lusk is identified for the provision of an Inter-Urban Route with direct connectivity to the Greenway and rest of the proposed cycle network. It is important to emphasise the close proximity of the town to the East Coast trail, which is part of the National Cycle Network Corridor 5 and would extend within the Greater Dublin Area from Arklow in the south to Drogheda in the north. Thus, further increasing the town’s connectivity, as well as the future demand for housing, infrastructure, and services.

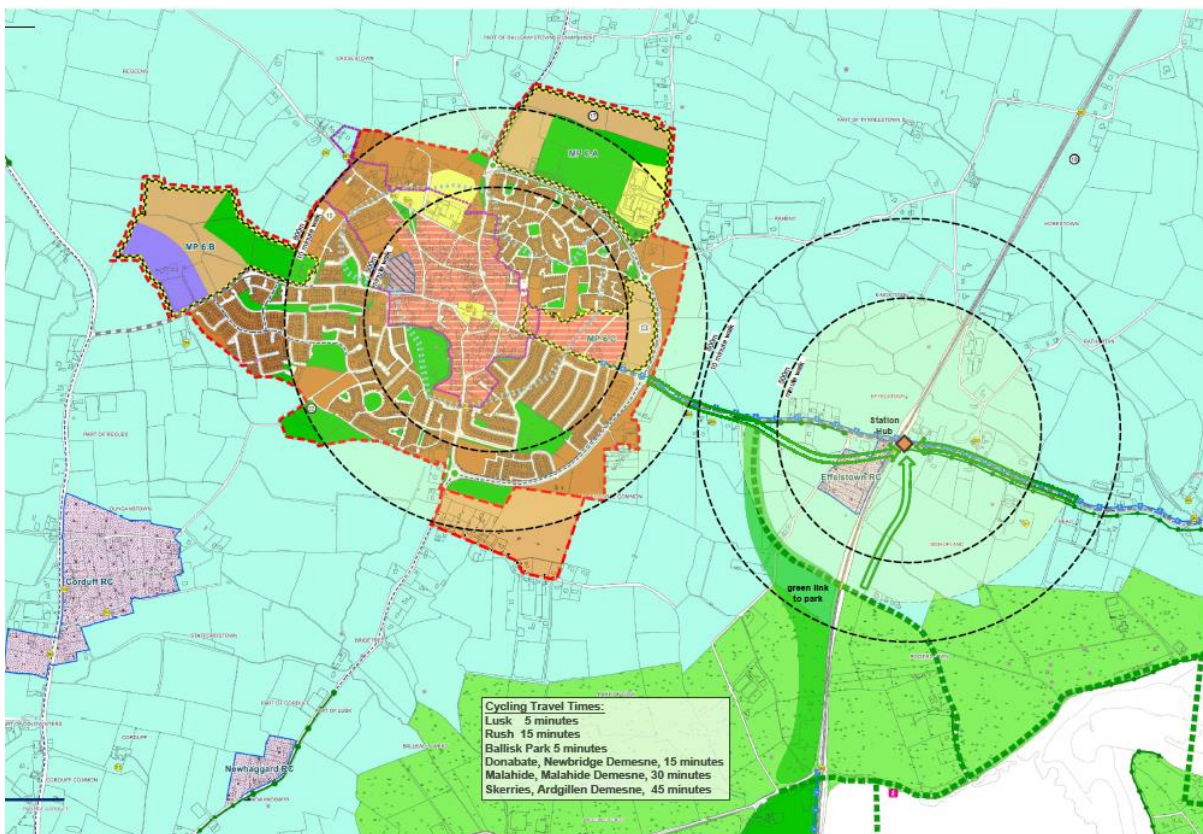


Figure 19. Cycle Links, Rush & Lusk Train Station

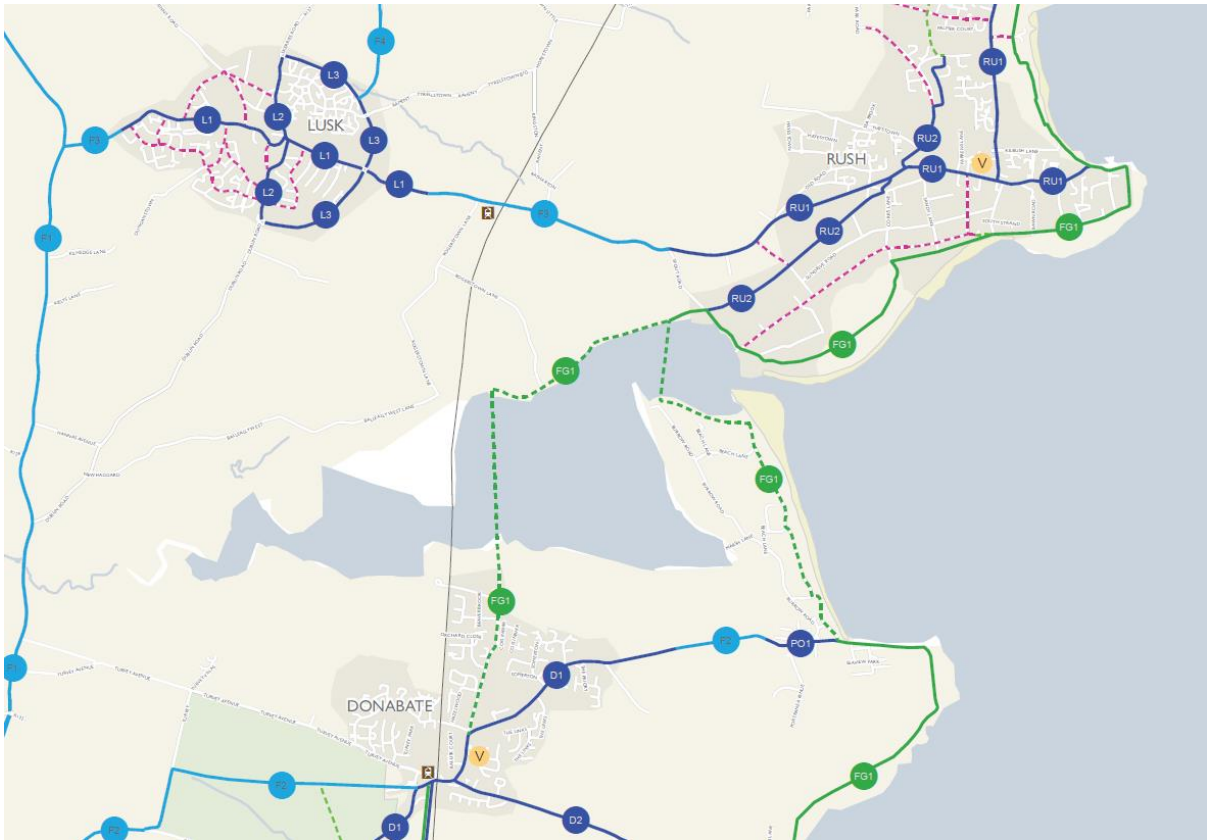


Figure 20. Proposed Cycle Route Network, Rush to Lusk Cycleway & Greenway connectivity.

Notwithstanding the above, it is also considered that the recently open Rogerstown Park to the south of the town (c.1.5 km) will transform the area in the coming years as it finalises the different stages for development. It will become one of the most important public amenities in the area and provide access to the fine landscape of Rogerstown Estuary and the Fingal coastline, and offer families, walkers and joggers opportunities for open-air recreation.



Figure 21. Distance between Lusk and Rogerstown Park

Whilst only a section of the park opened to the public, subsequent sections will open as works progress to completion and the landfill reaches an aftercare phase. It is acknowledged that plans to address accessibility from Rush and Lusk will be addressed and Rogerstown Park will be included in an overall Estuary Plan with possible links across the Estuary to Donabate considered.

In this regard, it is evident that this Self-Sustaining Town of Lusk and surrounding environs will see a transformation towards a more sustainable future and increased accessibility, connectivity, and significant quantum of open spaces areas for recreation. Alongside the estimated population growth, it is considered that Lusk will need additional lands to accommodate a gradual yet compact extension of the town and support Fingal in achieving the housing targets for the County.

7.7 Provision of Sustainable Development with Planning & Community Gain

It is respectfully submitted that the status and track record of the developer needs to be taken into consideration for this submission. In this regard, the proposer (Gannon Homes) has a strong and long-established working relationship with Fingal County Council in delivering quality homes and sustainable communities.

Furthermore, facilitating the growth of Lusk at this location brings development closer to the train station, which offers high-capacity public transport (to be upgraded to DART+) and as such will encourage sustainable transport. The lands are also beside the new town centre (also developed by the proposer) and the new community school and services.

8.0 CONCLUSION

Downey, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this submission to the Draft Fingal County Council Development Plan 2023-2029. This submission is made on behalf of our client, Gannon Homes, in relation to the zoning objectives of the lands at Beau, Lusk, Co. Dublin.

In keeping with the current Development Plan, this submission proposes that these c.10.72 hectares of land in Lusk be rezoned from “RU – Rural” to “RA – Residential Area”, under the draft Development Plan. Such a rezoning will correspond to the growing population, on-going development of the town, and with regards to the historical pattern of growth in Lusk.

Section 5 of this submission outlines consistency of this proposal within national, regional, and local planning policy and how it would contribute to sustainable planning and development of Lusk and in particular would provide for the housing targets of the town. This is also submitted to keep with the draft Development Plan and its proposed objectives and policies for future development of Lusk. Further details in this regard can be found in Section 6 of the submission. Section 7 of this submission further supports this proposal by providing grounds and justifications, which are summarised as follows:

- Demographic profile of Lusk illustrating an ever-growing population since 1991;
- Unchanged development boundaries of the town over the last three development plans including the draft Development Plan which is in contrast to the growing population and housing demand;
- Spatial distribution of recent developments in Lusk and pattern of growth in the town which expands in the northerly and easterly direction;

- Lusk’s strategic location and existing development pattern which enables it to be capable of accommodating future development and support the sustainable and compact growth of the town, as well as the economy of the surrounding area (especially rural clusters) which will benefit from the anticipated population growth.
- Consider the sequential extension of the existing boundary of Lusk to allocate additional lands zoned for future development in order to allow a compact and more sustainable growth of the town in a northern, eastern and southern pattern, given the town’s proximity to high quality public transport, employment bases, and existing services, as well as to a wide array of amenities and several parks (with a regional park within close proximity of the town).
- Encourage a compact sustainable growth of existing settlements at an appropriate density, with the provision of high-quality new housing served by an appropriate quantum of public spaces and community infrastructure.
- Consider the appropriateness of future housing provision within existing settlements located alongside the ‘Dublin-Belfast Economic Corridor’ and within approximately 1km of high-capacity public transport, in accordance with the policies and objectives of the Development Plan and national and regional planning policies such as the NPF and RSES.
- Noting the population distribution trend within Fingal and future cycle and open space provision, it is considered appropriate that the development boundary of Lusk be extended, and additional lands be zoned for future residential development.

With regards to the above-mentioned, Downey are of the professional opinion that the proposed rezoning of the lands to “RA – Residential Area” would expedite delivery of an appropriate quantum of residential development in a high-profile area in terms of construction.

In light of the above, Downey respectfully request that Fingal County Council consider the grounds and justifications of this submission into consideration when preparing the draft Fingal Development Plan 2023-2029.