



DRAFT DEVELOPMENT PLAN SUBMISSION

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

Proposed Re-zoning to “RA - Residential Area” **of**
Lands at Palmer Road, Rush, Co. Dublin

Client: PWCPS

May 2022

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FINGAL DEVELOPMENT PLAN 2023-2029

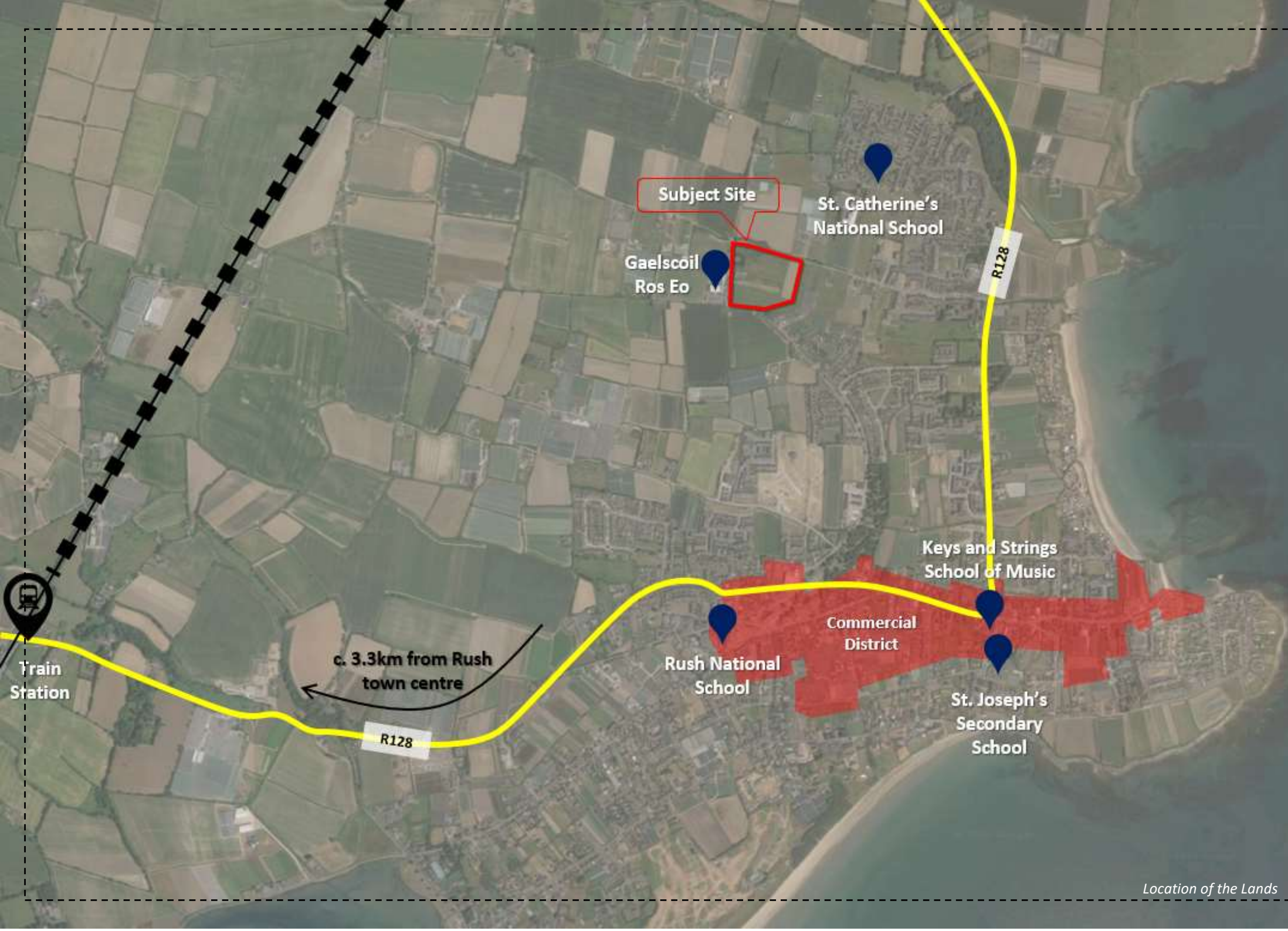
DRAFT PLAN
24TH OF FEBRUARY 2022

WRITTEN STATEMENT

EXECUTIVE SUMMARY

This submission is made by Downey, on behalf of our client, PWPCS in relation to re-zoning of the lands at Palmer Road, Rush, 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. This submission outlines consistency of the proposal with national, regional, and local planning policy, also provides grounds and justifications to the proposed re-zoning. These are as the following:

- *Strategic location of the town with access to Skerries Road (R128) and proximity to the Railway Station, promoting the accessibility of the town and its potential to accommodate the anticipated population growth.*
- *Demographic profile of Rush illustrating an ever-growing population since 1991 and a legacy of un-activated planning permissions which contribute to the housing target set for the town;*
- *Unchanged development boundaries of the town over the precedent development plans including the draft Development Plan which is in contrast to the growing population and housing demand;*
- *A sever under-estimation within the draft Development Plan for housing delivery by overlooking the real-time evaluation of planning policy and considering deliverability of the zoned lands;*
- *Spatial distribution of recent developments in Rush where majority of the developments are concentrated to the northern portion of the town and along the Skerries Road (R128);*
- *Spatial distribution of the population across the town and within the small areas indicating an urge for a more balanced housing delivery within the town utilising the existing lands of Rush;*
- *The conflicting aspirations and needs of Rush landowners appearing as an obstacle to achieving the zoning objectives of the Development Plan which suggests the need for a review of the zoning strategy to better facilitate not only housing demand in the town, but also promoting the street network and vehicular movement in the town.*
- *The conflicting policy objectives appears to add to the complexities of landownership in the townland of Kenure which suggests a re-assessment of planning policy is required to better facilitate development of the town and its growing population in a cohesive, coordinated manner;*
- *The granting of planning permission for certain uses is at odds with the housing zoning designation in emerging residential areas which results in barriers to achieving the zoning objectives of the Development Plan and thus re-examination of planning policy is justified;*
- *A consolidated pattern of growth within the existing lands of Rush will potentially assist in the delivery of an appropriate quantum of residential development. This would be fundamental to accomplishing the housing demand within the County;*
- *Should the lands be zoned as "RA - Residential Area" then it would provide for a counter-balanced development of the area through providing for road upgrade works, community services, and housing.*



Subject Site

St. Catherine's
National School

Gaelscoil
Ros Eo

R128

Keys and Strings
School of Music

Commercial
District

Rush National
School

St. Joseph's
Secondary
School

c. 3.3km from Rush
town centre

R128

Location of the Lands

LEGEND

- CI - Community Infrastructure
- DA - Dublin Airport
- FP - Food Park
- GB - Green Belt
- GE - General Employment
- HA - High Amenity
- HI - Heavy Industry
- HT - High Technology
- LC - Local Centre
- MC - Major Town Centre
- ME - Metro Economic Corridor
- NSC - National Sports Campus
- OS - Open Space
- RA - Residential Area
- RB - Rural Business
- RC - Rural Cluster
- RS - Residential
- RU - Rural
- RV - Rural Village
- RW - Retail Warehousing

Subject Site

*Extracted from the draft
Development Plan interactive map*

Subject Lands within the Draft Zoning Objectives

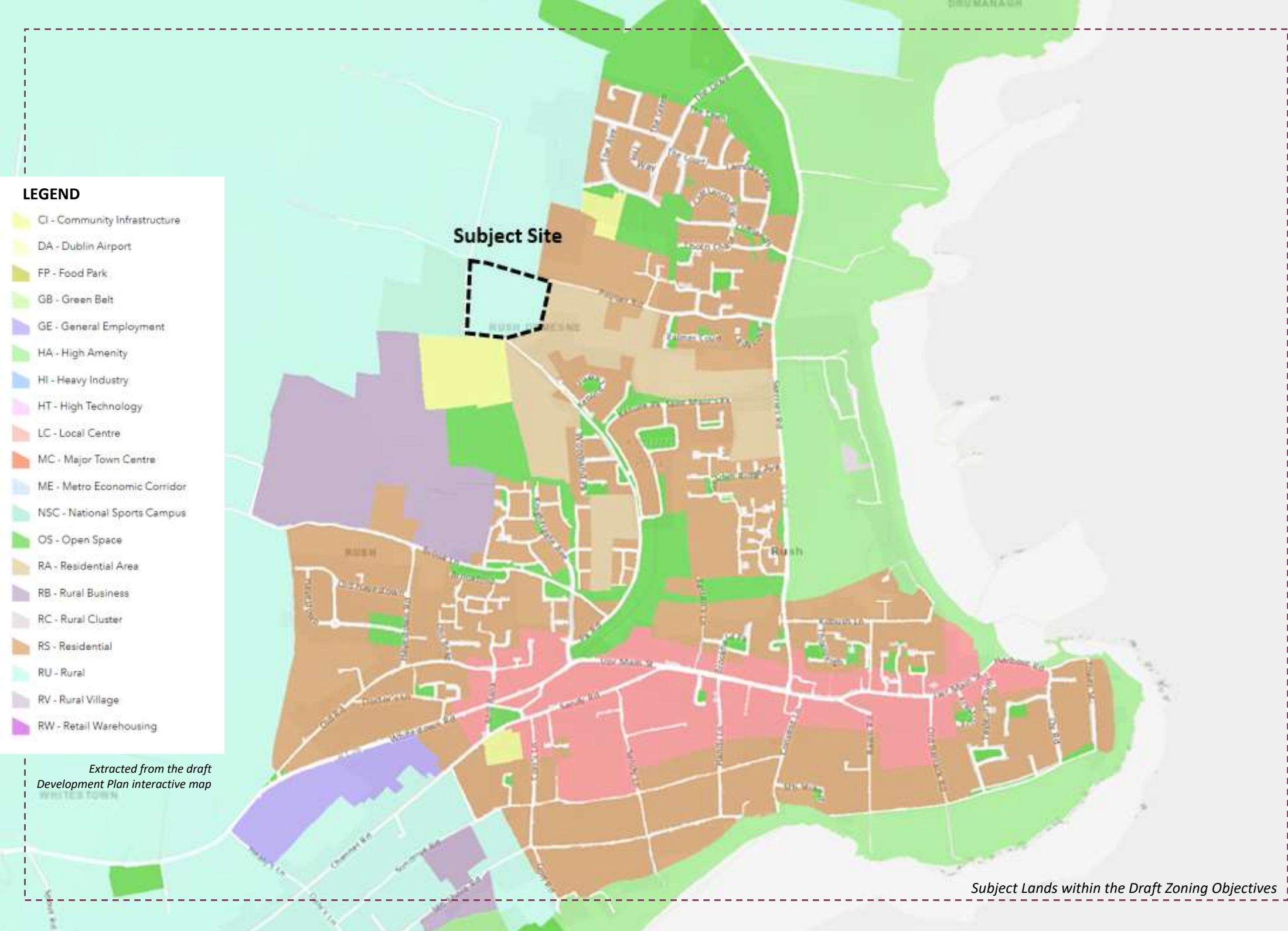


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This planning submission is made in response to the statutory review of the Fingal County Development Plan. Stage 2, known as the 'Draft' stage, requires submissions to be of a site-specific nature. Accordingly, this submission has been prepared in 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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Downey Planning Document Control			
	Name	Date	Version
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Approved by	Eva Bridgeman MIPI Director	12 May 2022	V_02_FINAL
	John Downey MIPI MRTPI Managing Director	12 May 2022	V_02_FINAL

1.0 INTRODUCTION

Downey, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this submission to the Draft Fingal County Development Plan 2023-2029. This submission is made on behalf of our client, PWCPS, 33 Baggot Street Lower, Dublin 2 in relation to the zoning objective of lands at Palmer Road, Rush, 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."

The consultation process of the Draft Development Plan is contained within Section 12 of the Planning and Development Act, 2000 (as amended), which states:

"12 - (1) Where the draft development plan has been prepared in accordance with section 11, the planning authority shall within 2 weeks of the period referred to in section 11(5)(c)—

(a) send notice and a copy of the draft development plan to the Minister, the Board, the relevant regional authority, the prescribed authorities, any town commissioners in the area and any city or county development boards in the area, and

(b) publish notice of the preparation of the draft in one or more newspapers circulating in its area.

(2) A notice under subsection (1) shall state that—

(a) a copy of the draft may be inspected at a stated place or places and at stated times during a stated period of not less than 10 weeks (and the copy shall be kept available for inspection accordingly), and

(b) written submissions or observations with respect to the draft made to the planning authority within the stated period will be taken into consideration before the making of the plan".

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

3.0 SITE LOCATION & DESCRIPTION

The subject lands are located off the Palmer Road and Park Road, Rush, Co. Dublin, circa 1.7km to the north of the Rush Main Street. The subject lands are bounded to the north by Palmer Road, to the west by Park Road, to the south and east by greenfield lands.

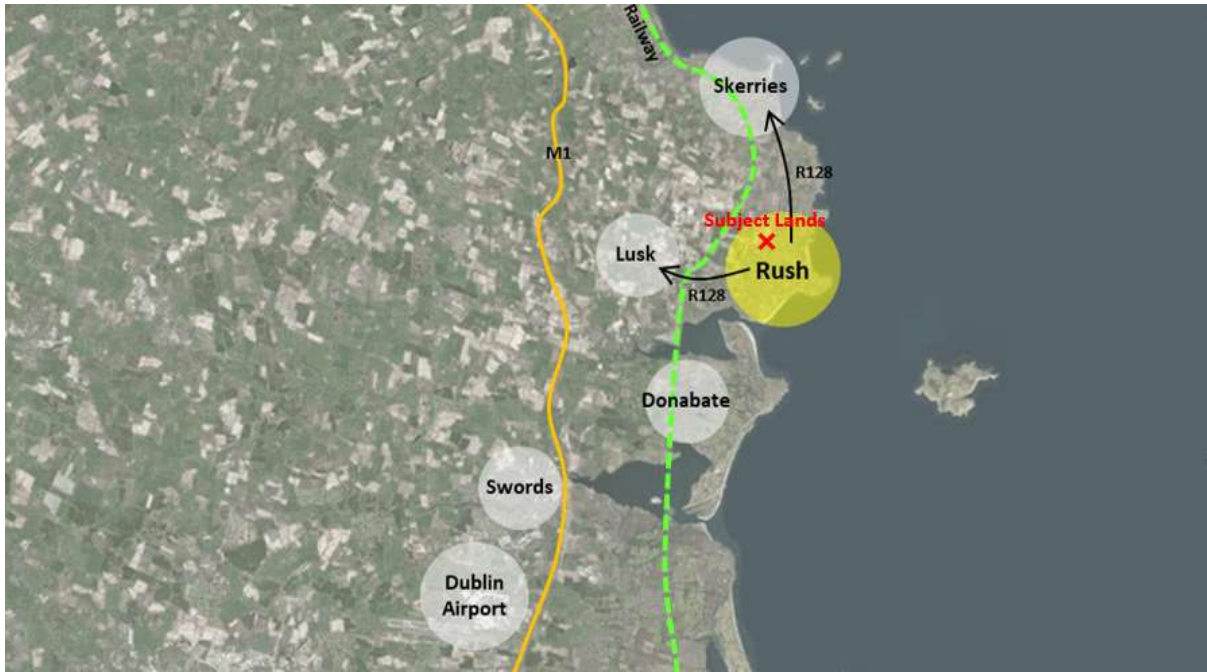


Figure 1. Strategic Location of the Subject Lands

With an approximate area of 3.5ha, the subject lands are neighbouring Gaelscoil Ros Eo and Saint Maurs GAA Club to the west. It is noted that St. Catherine's National School is also located within close proximity of the site. These existing and emerging housing estates and community facilities render a serviced neighbourhood. Despite recent road improvement works along Park Lane, which includes provision for footpaths and cycle lanes, the Palmer Road and Park Lane along the western boundary of the subject lands are still characterised as rural access routes.

The adjoining lands are experiencing residential development including, Hyde Court, and also there is a live planning application for the construction c. 74 houses and duplexes on lands at Palmer Road and Palmer Avenue.



Figure 2. Aerial View of the Application Site (approximate boundaries of the subject site outlined in red)

4.0 PLANNING HISTORY

Downey have carried out an examination of the planning history of the subject site which determined that there have been several planning applications made on the lands, however these are mostly application for single-storey bungalows. The details of these applications have been summarised as follows:

- **Reg. Ref. F99A/0637** - By order dated 22nd July 1999, Fingal County Council refused permission to J. Corrigan for “a dormer dwelling and biocycle system” on lands at Palmer Road, Rush, Co. Dublin.
- **Reg. Ref. F99A/0920** - By order dated 15th September 1999, Fingal County Council refused permission to T. Doyle for “a bungalow and biocycle treatment plant” on lands at Palmer Road, Rush, Co. Dublin.
- **Reg. Ref. F99A/1301** - By order dated 25th February 2005, Fingal County Council refused planning permission to T. Doyle for “a bungalow and biocycle treatment plant” on lands at Palmer Road, Rush, Co. Dublin.
- **Reg. Ref. F16A/0512** - By order dated 21st February 2017, Fingal County Council granted permission for retention to PWCPs for “retention of existing boundaries to east and south of the existing detached bungalow (located opposite St. Maurs GAA Club/Gaelscoil Ros Eo).” on lands at Park Road, Rush, Co. Dublin.

As can be seen, there have been several attempts to develop a bungalow on a parcel of the lands, however, these applications were mostly refused based on contravening the zoning objective of the lands.

5.0 PLANNING CONTEXT

5.1 Project Ireland 2040: National Planning Framework

The National Planning Framework (NPF) is *“the Governments 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.

As asserted in the NPF, getting the physical form and location of future development right offers the best prospect for unlocking regional potential. The Mid-East has experienced high levels of population growth in recent decades, at more than twice the national growth rate. In the context of around one million additional people in Ireland by 2040, it means planning for 490,000-540,000 additional people in the Eastern and Midland Region i.e., a population of around 2.85 million.

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.”*

As **NPO 3c** states, it is the objective of the NPF to:

‘Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints.’

Outlined in the NPF, sustainable models of urban development can deliver quality and maximise the advantages and opportunities of more compact growth, based on increased population and employment density. Quality of design is critical for making places attractive and distinctive. Architectural quality and well-designed spaces can help to enhance our urban areas and create desirable places in which people want to live, work, or visit and contribute to ongoing quality of life and well-being.

As NPO 6 states, it is the objective of the NPF to:

‘Regenerate and rejuvenate cities, towns and villages of all types and scale 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.’

With respect to the above, the proposed re-zoning of the lands to provide for housing delivery in Rush is suggested to be consistent with the NPF by the reason of location, which can be characterised as spatially sequential to on-going developments occurring in the vicinity of the lands, i.e., the subject lands are generally positioned within the existing built-up footprint of Rush, appearing contiguous to the proceeding developments to the area. Also, existing community services in the area supports additional housing provision in the area, where a synergetic relationship can be created.

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 along Palmer Road, is considered to keep with the NDP, i.e., by assisting in delivery of housing target within an existing built-up area which enjoys access to existing road infrastructure and community services.

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 Rush north, along Palmer Road 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 forthcoming Development Plan.

5.5 Eastern and Midlands Regional Spatial and Economic Strategy (2019)

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 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 Rush, 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 Palmer Road area noting the proximity to road infrastructure and diverse amenities, including schools, GAA club, and sport facilities.

As previously stated, the town of Rush 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 public 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

Rush is within the current Development Plan designated as a “Self-Sustainable 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”*. As per the Development Plan, *“It will be important that Lusk, Rush and Skerries develop in a self-sufficient manner in order to prevent them from becoming dormitory towns. A full range of services should be available to meet local needs and that of the surrounding rural areas in order to encourage smarter travel patterns and to provide for further growth. At present Skerries has the most developed commercial offering of the three towns, while Rush has benefitted from recent investment.”*

As **Objective SS20** states, it is the objective of the Council 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.’

The aim of the DP is to expand the commercial, retail and employment within Rush. Having regard to the level of housing development which has taken place in Rush, it is considered that a 5% growth level is appropriate. This is translated to 58 hectares of lands zoned as residential to accommodate 1,994 no. residential units over the Plan period.

The development strategy for Rush is to expand the town centre as a commercial, retail, employment and services centre serving the expanding community in line with the town’s designation as a Self-Sustaining Town. The consolidation of Rush and the distinct physical separation of Rush and Lusk as separate towns is a fundamental principle of the development strategy.

Outlined in the Development Plan, the economic bases of Lusk and Rush will be strengthened and diversified, and as Self-Sustaining Towns in proximity to a rail network will continue to grow and function as commuter locations.

Considering the substantial population growth of Rush, with rail connectivity to Dublin City effectively changing the demographic profile of the area, the Development Plan emphasise on the consolidation of this settlement within its development boundaries in order to protect the unique identity of the town. 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 58ha lands zoned to potentially deliver up to 1,994 no. dwellings from the previous Plan period, the current Development Plan did not provide for additional residential lands, proposing an overall of 51.5ha lands which is suggested to potentially deliver up to 1,771 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	1498		
Other	66.5	2,320		
Settlements*				
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	3805		
Rush	51.5	1771		
Lusk	38	1020		
Skerries	32.7	883		
Towns & Villages				
	101	818		
Total Core	357	8,298	24%	19%
TOTAL Fingal**	1,519	43,104	100	100

Figure 3. Total Residential Capacity provided extracted from the Fingal Development Plan 2017-2023

In terms of specific objectives regarding Lusk, **Objective RUSH 22** of the Development Plan seeks to:

“Prepare and/or implement the following Local Area Plan and Masterplans during the lifetime of this Plan:

- *Kenure Local Area Plan (see Map Sheet 6B, LAP 6.A)*
- *Kenure South Masterplan (see Map Sheet 6B, MP 6.D)*
- *Whitestown Masterplan (see Map Sheet 6B, MP 6.E)”*

In relation to zoning objective of the subject lands, it is submitted that the lands are zoned “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	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 4. Use Classes Permitted in Principle under RU Zoning Objective

5.7 Rush Urban Framework Plan 2018

Prepared under Fingal Development Plan 2017-2023, the Rush Urban Framework Plan aims to create a structured development strategy for the town centre of Rush and identifies actions required to encourage the rejuvenation and revitalisation of the town centre. Outlined in the CDP, this Urban Framework Plan is to:

- guides and informs future development to include promoting permeability and accessibility within the town centre;

- provide design guidance for addressing potential infill development sites; and
- provide measures to assist with the regeneration of the Harbour.

Therefore, the UFP aims to create a structured development strategy for the town centre of Rush and identifies actions required to encourage the rejuvenation and revitalisation of the town centre. The UFP identifies potential development sites for new residential, retail, employment or leisure development and will act as a general guidance document for the Planning Authority and potential applicants, forming a basis for agreeing the principles of future development within Rush Main Street. With respect to this, the study area of the UFP is restricted to the town centre of Rush, or the so-called spine of the town.

6.0 DRAFT FINGAL DEVELOPMENT PLAN 2023-2029

Rush 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 43ha lands zoned to potentially supply 1,631 no. dwellings from the current Development Plan, the draft Development Plan proposes no additional residential lands. 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. 402 persons over 2023-2029 to reach a population of 11,279 persons for Rush by 2029, which accounts for c. 3.1% of the overall population estimated for Fingal by 2029. This is submitted to be regardless of the unmet demand from the previous Plan period.

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, Balcadden	4,439	4,617	4,753	90	80	745
Rural			7,121	7,263	8,650			

Figure 5. Total Residential Capacity provided extracted from the draft Fingal Development Plan 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 ⁷
Residential ⁴	Restaurant/Café ¹³	Utility Installations
Veterinary Clinic ²¹		

Figure 6. 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 Rush

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 foregoing upwards trend is also present in the town of Rush, where the population recorded an ever-increasing trend since 1991. As it can be traced in the Figure below, the population of Rush increased from 9,231 in 2011 to 9,943 in 2016, which provides for a growth rate of 7.7% over the intercensal period (1.3% annual growth rate).

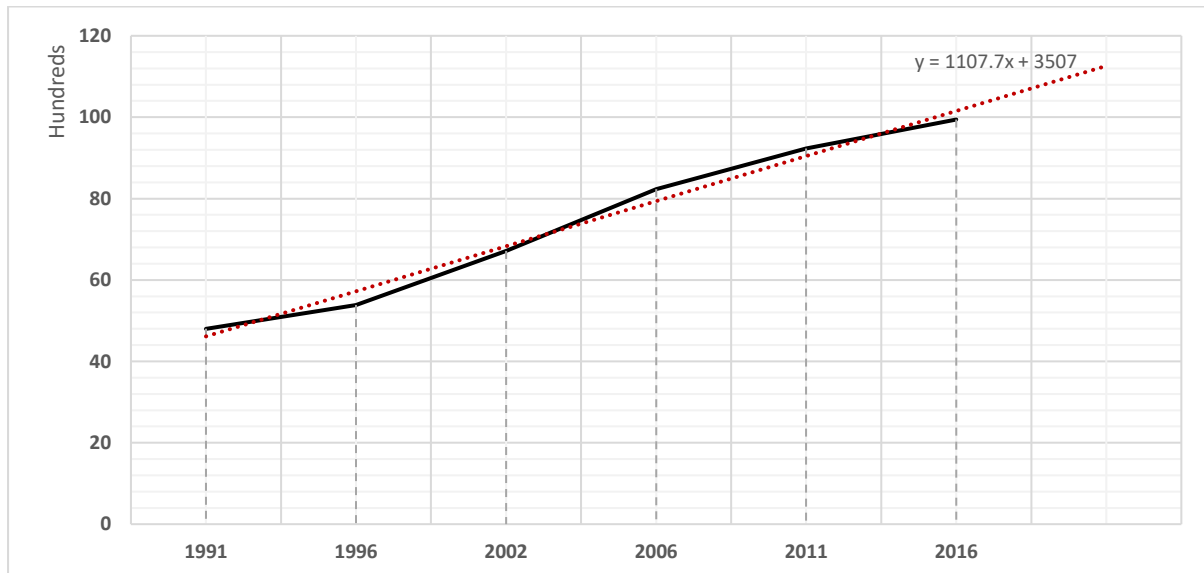


Figure 7. Population and its Changing Trends in Rush since 1991

From the existing demographic trends, it is evident that there is a steadily growing demand for housing in Rush. Utilising a linear population projection model and assuming a continuation of 2011-2016 population growth providing for a growth rate of 1.3% per annum, as specified below, an overall total

of 11,739 persons is anticipated to reside in Rush by 2029. This is submitted to be +460 persons above what is projected in draft Development Plan (11,279 persons by 2029).

Table 1. Projected Population for Rush 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	9,231	-	-		
2016	9,943	7.7%	712		
2017	10,071	1.3%	128		
2018	10,200	1.3%	129		
2019	10,331	1.3%	131		
2020	10,464	1.3%	133		
2021	10,599	1.3%	135		
2022	10,735	1.3%	136		
2023	10,873	1.3%	138		
2024	11,013	1.3%	140		
2025	11,154	1.3%	142		
2026	11,298	1.3%	143		
2027	11,443	1.3%	145		
2028	11,590	1.3%	147		
2029	11,739	1.3%	149	1,004	1,796

Moreover, the spatial distribution of population residing in Rush, as mapped out below, is not reflecting a clear and consolidated pattern of growth. However, it can be said that the densest areas are scattered in the northern portion of the town placed along the Skerries Road (R128); these areas are coloured in navy blue on the map. On the contrary, the lands in the southern section which are coloured in light blue, are accommodating lesser densities.

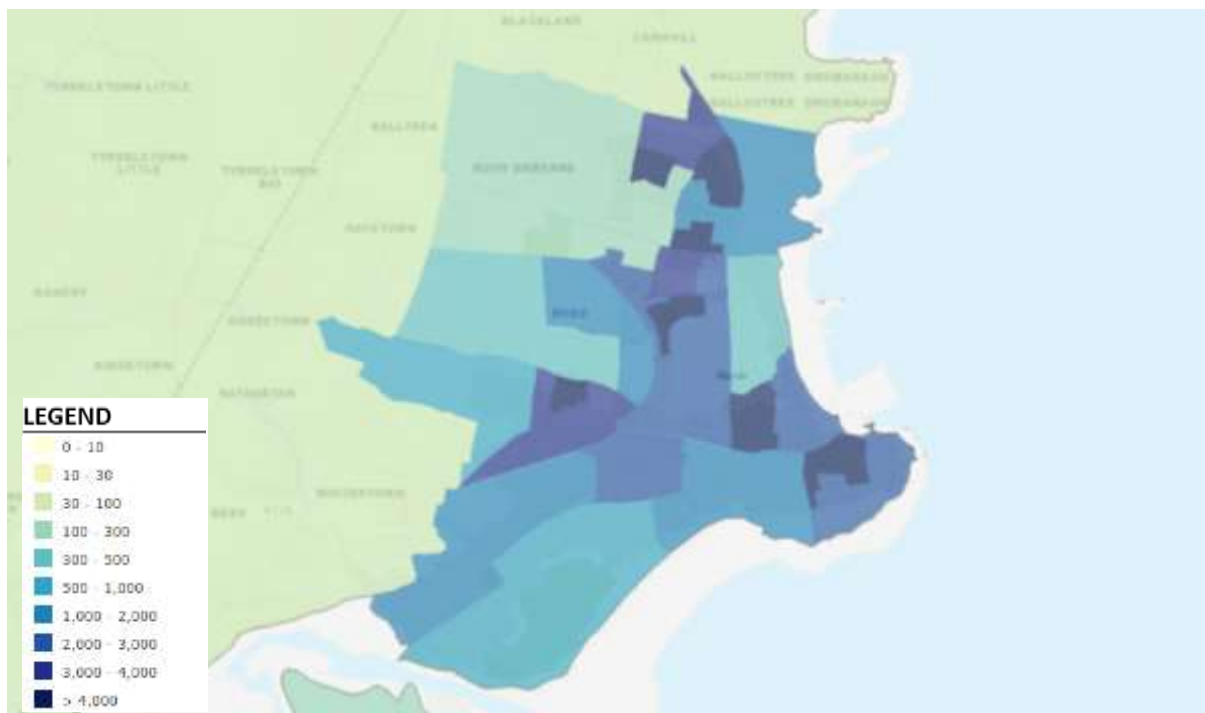


Figure 8. Spatial Distribution of Population Density per Km² in Rush, 2016

As mentioned earlier, the draft Development Plan projects that Rush population will stand at 10,877 people by 2023 and 11,279 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 10,359 people that is not clear where it is taken from. Extracted from the CSO StatBank (E2016), the population of Rush in 2016 stood at 9,943 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 also 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 Sequencing of Rush 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 Rush 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. As can be seen, these changes were mostly regarding extending south-western development boundaries of the town to provide for additional “GE - General Employment” zoning to the south of Whitestown Road (R128) and pushing the western development boundaries of the town to provide for “RB - Rural Business” to the north of Brook Lane. There were also several re-zonings of the lands in the southern parts of the town to provide for additional “RA - Residential Area”.

Except for the above-mentioned changes, no major changes to the zoning strategy and development boundary of Rush can be observed over the precedent development plans, 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.

This is also confirmed by the Core Strategy figure discussed in sub-section 5.6, where the quantum of residentially zoned lands in Rush in the current Development Plan has been confirmed with the previous Development Plan. As said, with a remaining capacity of 58ha lands zoned to potentially deliver up to 1,994 no. dwellings from the previous Plan period, the current Development Plan did not provide for additional residential lands, proposing an overall of 51.5ha lands which is suggested to potentially deliver up to 1,771 no. dwellings.

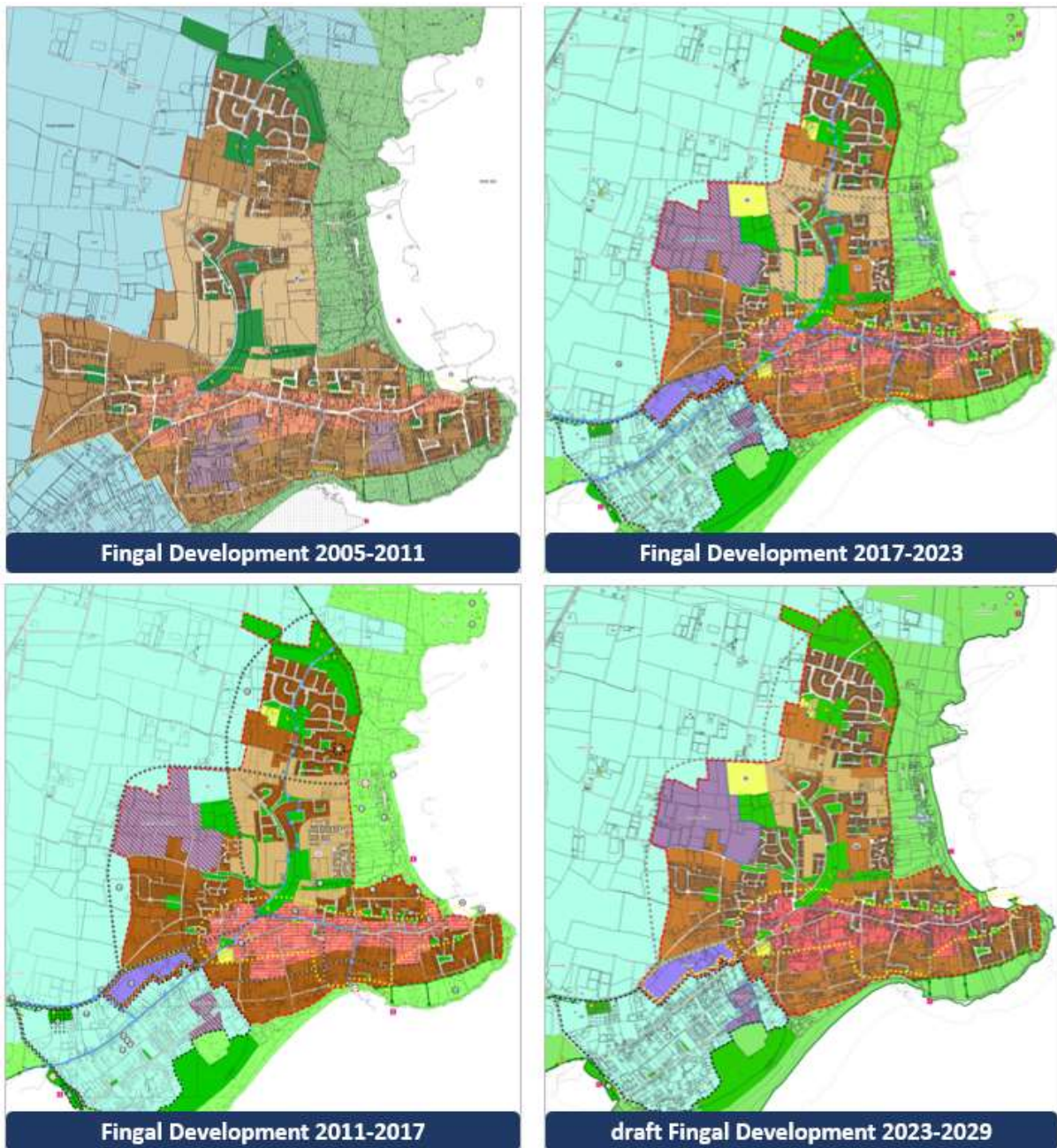


Figure 9. An Overview of Zoning Strategy in Lusk Since 2005 Development Plan

The sequencing of Rush zoning strategy maps also reveals that the southern portion of the town are established residential areas, whereas the northern parts are the most dynamic and this seems to be interrupted by the residentially zoned landbank at the central Rush, which suggests a re-assessment of the planning policy against land availability and deliverability in the town.

7.3 Recent Developments & Direction of Growth

In recent years, there have been several notable developments approved and/or under construction within Rush, 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. 314 no. units to be potentially delivered in Rush by 2023. This includes Hyde Court development providing for 22 no. dwellings (F16A/0148 - granted permission and built), Skerries Road SHD providing for 165 no. dwellings (TA06F.305534 - granted permission and under construction), Upper Main Street development providing for 67 no. dwellings (F20A/0664 - granted permission), Brook Lane development providing for 40 no. dwellings (F17A/0739 - granted permission), and North of Old Road development providing for 20 no. dwellings (F17A/0391 - granted permission).

As shown above, most recent residential developments within Rush are mostly directed towards northern Rush and along the Skerries Road (R128), which considering the existing road infrastructure is suggested to be a result of mutual consistency between land use planning and transport planning. However, the following provides more items affecting the direction and quantum of development in the town.

7.4 Contribution of Kenure LAP lands to the Housing Delivery

As per both current Development Plans, the Kenure LAP has been introduced as a notable landbank to contribute to the housing target of Rush. However, cross-referencing this with the housing delivery in the town since 2000, as illustrated in *Figure 11*, it is apparent that despite emerging housing demand in the town, most of the housing delivery was provisioned outside of the existing zoned lands at Kenure. Noted that to facilitate housing delivery in this area and to aim for a more consolidated pattern of development in the town, the County Council prepared the Kenure Local Area Plan in 2009-2015, which was then extended up to 2017. However, the CSO database, as shown in the Figure below, indicates that the lands have not been developed yet.



Figure 11. Housing Delivery in Rush (Left: 2001-2010, Right: 2011 or later)

Reading this in conjunction with the recent developments in Rush, it is apparent that despite an active profile of construction in the town, there are barriers to achieving the housing zoning objective for this emerging residential area. Coupled with no additional provision for residentially zoned land for Rush in the draft Development Plan, this suggests an undeliverable land reserve which though has locked up the inner town development potential over the past three plan periods and possibly over the forthcoming Development Plan, it is still proposed to provide for a considerable quantum of residential land in Rush. On this basis, a re-assessment of deliverability of the existing landbanks within the legislative boundaries of Rush would establish realistic grounds to housing provision for the town over the coming years.

With regards to the foregoing and considering the dynamic of the northern Rush in housing delivery, it is suggested that re-zoning of the subject lands would considerably expedite achieving the housing target set for Rush in the draft Development.

7.5 Barriers to Achieving Development Plan 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 housing, public infrastructure, and community facilities. This zoning strategy is primarily designed upon compatibility of different land uses and in order to accommodate the expected growth within the lifetime of the Plan and facilitate a compact and smart pattern of growth. However, these targets are not always technically possible or achievable in the timeframe set.

In the case of Rush, a thorough review of the current and previous Fingal Development Plan, as illustrated in *Figure 12*, indicates that the Council is heavily relying on the lands at Kenure to meet the expected housing demand.

However, as shown in *Figure 11*, most housing developments since 2011 and earlier back to 2000 took place outside of this area. Considering this on-going trend of housing construction in Rush demonstrates a dynamic housing market, though, the spatial distribution of this housing delivery

suggests that the zoning objective is not practically achievable. It is noted that to facilitate development in this area, the Council prepared the Kenure Local Area Plan in 2008 which was then extended to 2017 under the Fingal Development Plan 2011-2017.

The individual, small land plots with numerous landowners in this area results in the emergence of conflicting aspirations, which challenges delivery of the Development Plan targets and proposals. Given the time that has passed since lands have been originally zoned in Rush, such as in the townland of Kenure, it has become apparent that some landowners are actively seeking planning permission and delivering housing such as our client, PWCPS, whilst other landowners of RA zoned sites do not intend on seeking planning permission or delivering housing on their zoned, serviced lands. Efforts have been made to acquire these lands over the last number of years but unfortunately the lands are not available for sale and are unlikely to come to market in the foreseeable future. This is the case with a significant quantum of RA lands within Rush. This lack of progression has resulted in lands which are designated for housing and prioritised for development within the Development Plan being unavailable for housing and thus the core strategy's objectives for Rush cannot be delivered.

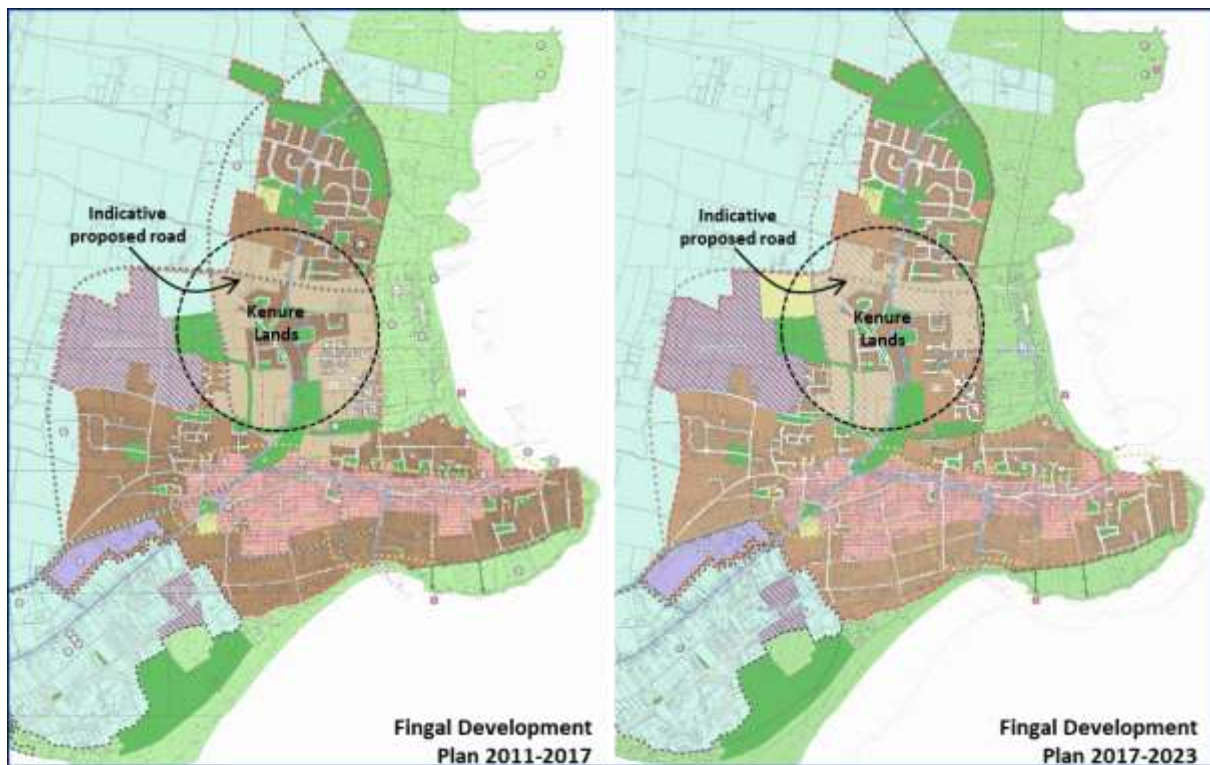


Figure 12. Comparing the Zoning Objective of Rush in the Current and Previous Fingal Development Plans

In addition, recent grants of planning permission in this area showcase the complexity of achieving the housing zoning objective on these lands. Permission for agricultural structures is at odds with the zoning designation and overall vision for this emerging residential area. Such uses undermine the current zoning objective of the lands and demonstrate the barriers to achieving the housing zoning objective for this emerging residential area. This indicates not only the conflicting aspirations of the local community, but also conflicting planning policy which needs to be re-assessed on the grounds of existing conditions and what best serves the efficient development of Rush.

Furthermore, the locked potential of the lands in Kenure is not only a barrier to achieving the housing targets of the Development Plan, but it also creates difficulties in the delivery of the proposed east-west road parallel to Palmer Road, which if not delivered would affect the accessibility of the town, despite its growing population. Furthermore, the proposed north-south road partially traverses lands which are essentially un-zoned lands. It is unclear how this road can be achieved as a result, but is considered essential for the future development of this emerging area of Rush. Therefore, the lack of progress on the delivery of these roads over the lifetime of the previous and current Development Plans needs to be clearly addressed in the review stage of this Development Plan process.

In light of the above, it is suggested that the current zoning objective of some of the lands are neither efficiently serving the existing and emerging needs of the town nor addressing the long-lasting conflicting interest of the local community and associated complexity of landownership and deliverability. It is therefore considered reasonable that the planning policy needs to be re-assessed.

7.6 Access to Principal Transport Corridors

Once as the heart of market gardening in Leinster with agriculture as its dominant sector, Rush horticulture and agriculture is now co-existing with emerging and growing residential areas noting the town's role as a commuter belt town. As illustrated in *Figure 13*, the town centre is accessible in walkable distances ranging from 500 metres to 2000 metres. The railway station is located within c. 3.3 kilometres of the town centre, facilitating the commuting role of the town. According to Census 2016, 1,486 persons of the overall number of workers in Rush (4,316 persons) were travelling to Dublin city and suburbs for work. This is 36.9 percent of the overall workforce of the town.

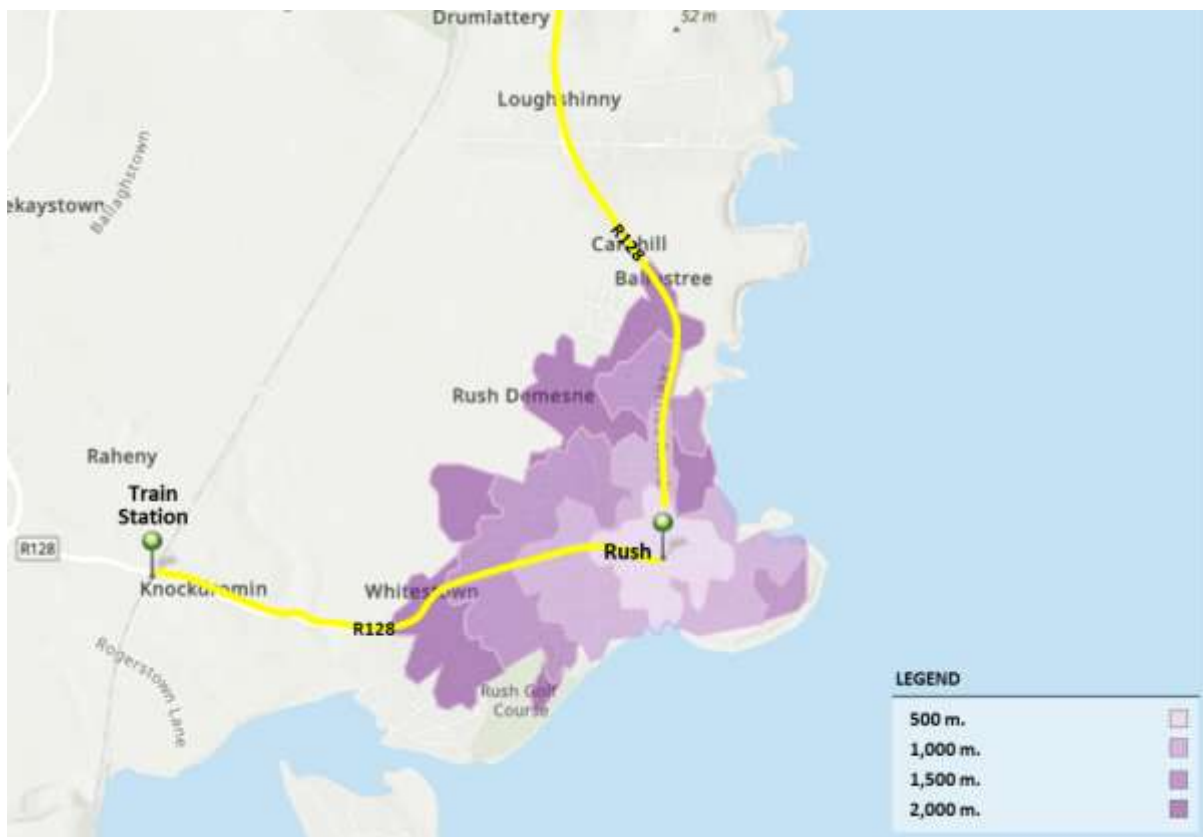


Figure 13. Strategic Location of Rush with Multiple Buffer Zones of 500 metres

7.7 Upgrading Existing Road vs. Providing Additional Roads

As illustrated below, the draft Development Plan provides for a north-south road crossing the subject lands. However, it is proposed the existing road capacity would sufficiently cater for the existing and future population of the town subject to implementing road upgrade works. This is also submitted to assist in maintaining the character of the town, prevent from creating a car-dominant townscape for the Rush.



Figure 14. Proposed North-South Connection in the Draft Development Plan (dashed in grey)

In this regard, the proposed re-zoning of the subject lands would allow for not only housing delivery, but an opportunity to lead the captured value of the lands into upgrading existing road infrastructure. This is also in line with the recent road upgrade along the Park Lane to the west of the subject lands which includes provision for cycle lane and footpath.

7.8 Provision of Sustainable Development with Planning & Community Gain

The proposed re-zoning and future development of these lands will also incorporate significant areas of public open space, road upgrade works along Palmer Road and Park Lane, as well as housing. The public open space creates the opportunity to provide significant community gain in the form of new playing pitches, parks, walkways, etc. while road upgrades promote accessibility and permeability along and across the lands. This is suggested to effectively increase the safety levels for all road users, in the likes of pedestrians, cyclists, and drivers, in particular with regards to the existing schools around and close to the lands. Clearly, these community services and infrastructural work could be used by local schools, clubs and organisations, who are facing increased demands on limited resources and facilities. The proposer would be happy to work with the Planning Authority in the provision of specific facilities at the appropriate time.



Figure 15. Artistic Impression of Future Zoned Lands and the Improvements it can bring to the Area

8.0 CONCLUSION

Downey, Chartered Town Planners, 29 Merrion Square, D02 RW64, have prepared this submission to the Draft Fingal County Development Plan 2023-2029. This submission is made on behalf of our client, PWCPS, in relation to the proposed change of zoning objective to “RA – Residential Area” for the lands at Palmer Road, Rush, Co. Dublin. The lands extend to approximately 3.5ha and appear as an extension to the on-going developments taking place within vicinity of the lands.

In keeping with the current Development Plan, the land has been proposed to be zoned as “RU – Rural” under the draft Development Plan. However, our client is seeking to have land zoned as “RA – Residential Area”, in order to correspond to the recent developments occurring in Rush north, anticipated population growth, and a legacy of un-activated planning permissions.

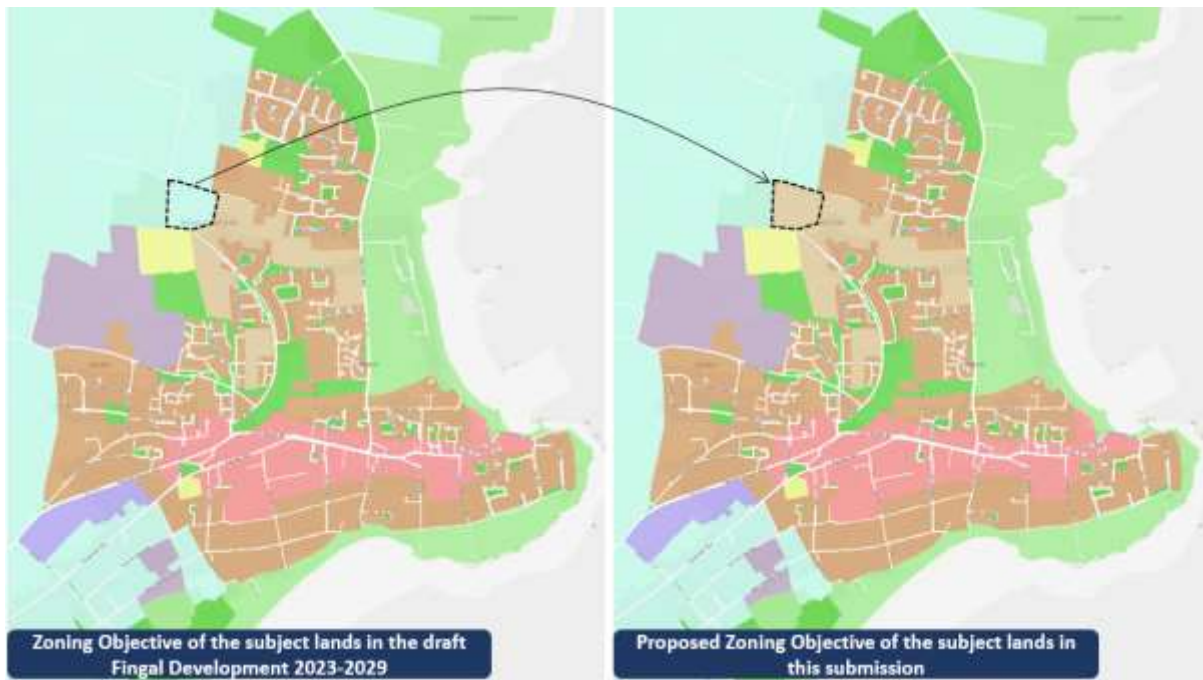


Figure 16. Proposed Zoning Objective for the Lands against Zoning Objective of the Lands in the draft Development Plan

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 Rush. This is also submitted to keep with the draft Development Plan and its proposed objectives and policies for future development of Rush. 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:

- Strategic location of the town with access to Skerries Road (R128) and proximity to the Railway Station, promoting the accessibility of the town and its potential to accommodate the anticipated population growth.
- Demographic profile of Rush illustrating an ever-growing population since 1991 and a legacy of un-activated planning permissions which contribute to the housing target set for the town;
- Unchanged development boundaries of the town over the precedent development plans including the draft Development Plan which is in contrast to the growing population and housing demand;
- A severe under-estimation within the draft Development Plan for housing delivery by overlooking the real-time evaluation of planning policy and considering deliverability of the zoned lands;
- Spatial distribution of recent developments in Rush where majority of the developments are concentrated to the northern portion of the town and along the Skerries Road (R128);
- Spatial distribution of the population across the town and within the small areas indicating an urge for a more balanced housing delivery within the town utilising the existing lands of Rush.
- The conflicting aspirations and needs of Rush landowners appearing as an obstacle to achieving the zoning objectives of the Development Plan which suggests the need for a review of the

zoning strategy to better facilitate not only housing demand in the town, but also promoting the street network and vehicular movement in the town.

- The conflicting policy objectives appears to add to the complexities of landownership in the townland of Kenure which suggests a re-assessment of planning policy is required to better facilitate development of the town and its growing population in a cohesive, coordinated manner.
- The granting of planning permission for certain uses is at odds with the housing zoning designation in emerging residential areas which results in barriers to achieving the zoning objectives of the Development Plan and thus re-examination of planning policy is justified.
- A consolidated pattern of growth within the existing lands of Rush will potentially assist in the delivery of an appropriate quantum of residential development. This would be fundamental to accomplishing the housing demand within the County.
- Should the lands be zoned as “RA - Residential Area” then it would provide for a counter-balanced development of the area through providing for road upgrade works, community services, and housing.

With regards to the above-mentioned, Downey are of the professional opinion that the proposed re-zoning of the lands to “RA – Residential Area” would be consistent with the national, regional and local planning policy, while it is more reflective of the existing circumstances and dynamic of development in Rush. Moreover, the deliverability of the lands and active profile of the proposer in terms of housing delivery, it is suggested that this re-zoning proposal would ensure timely delivery of housing within Rush in a cohesive, proper planning manner.

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.