

**D C W N E Y**

# **DRAFT DEVELOPMENT PLAN SUBMISSION**

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

**Proposal: Rezoning Lands from “GB – Green  
Belt” to “CI – Community Infrastructure”**

**Address: Lands within Southwestern boundary  
of Swords, Co. Dublin**

**Client: Gerry Gannon**

**May 2022**



# FINGAL DEVELOPMENT PLAN

## 2023-2029

DRAFT PLAN  
24<sup>TH</sup> OF FEBRUARY 2022

### WRITTEN STATEMENT

## EXECUTIVE SUMMARY

*This submission is made by Downey Planning, on behalf of our client, Gerry Gannon, and 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.*

*Along the southern boundary of Swords, the subject site is partially zoned “RS – Residential” and “GB – Green Belt” under the current Development Plan. The respective objectives of these zonings are as follows:*

*“Provide for residential development and protect and improve residential amenity”*

*“Provide for and protect civic, religious, community education, health care and social infrastructure”*

*The southern part of the client’s land, zoned GB – Green Belt, remains entirely underutilised, especially given the dearth of community spaces available for residents in the western side of Swords. While there are plentiful commercial and recreational uses on the eastern side of the town, the southwestern corner lacks any community infrastructure.*

*To address this imbalance, we therefore propose that the southern part of the subject site should be rezoned “CI – Community Infrastructure.”*







*Current Land Use Zoning of the Lands, site outlined yellow*

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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
Prepared by	Cathal Brennan MIPI Planner	12 May 2021	V_01_DRAFT
Approved by	Donal Duffy MIPI MRTPI Director	12 May 2021	V_02_ DRAFT

## 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, Gerry Gannon, in relation to the rezoning of their lands situated within the southwestern corner of Swords, 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., 12 May 2022, as set out on the Draft Development Plan's website

Under the current Development Plan 2017-2023, the subject site, which is undeveloped, is zoned as "RS - Residential" and "GB – Green Belt". The objective of this zoning is as follows:

*"Provide for residential development and protect and improve residential amenity."*

However, it is noted that within the current Draft Plan, the Local Objective has been removed, thereby allowing residential development within the northern part of the subject site. This is positive; however, it is considered that the southern part of the client's land, zoned GB – Green Belt, remains entirely underutilised, especially given the dearth of community spaces available for residents in the western side of Swords. While there are plentiful commercial and recreational uses on the eastern side of the town, the southwestern corner lacks any community infrastructure.

Our client is eager to add to the housing stock of Swords; however, they are also concerned with the lack of appropriate social and community facilities within the surrounding area. As such, to address the counterbalance in available community infrastructure between the western and eastern sides of the town, we propose that the part of the subject site zoned "GB – Green Belt" be rezoned to "CI – Community Infrastructure".

## 2.0 Legislative Basis

Section 9 of the Planning and Development Act, 2000 (as amended) provides that, subject to the requirements set out in Sections 9, 10, 11 and 12 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) and 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 (12<sup>th</sup> May 2022) as set out on the website of the Draft Fingal County Development Plan 2023-2029.

### 3.0 Site Location & Description

The subject site is located within the southwestern corner of the settlement boundary of Swords. It has an irregular shape and an area of approx. 5.26 ha. The site lies within the southwestern corner of Swords, a large town of c. 40,000 people.



**Fig. 1 – Subject Site**

The site had previously been in use as a golf driving range. The subject site remains undeveloped.

### 4.0 Planning Context

#### 4.1 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.

The NPF states the importance of Compact Growth:

*“Carefully managing the sustainable growth of **compact cities, towns and villages** will add value and create more attractive places in which people can live and work. **All our urban settlements contain many potential development areas, centrally located and frequently publicly owned, that are suitable and capable of re-use to provide housing, jobs, amenities and services, but which need a streamlined and co-ordinated approach to their development, with investment in enabling infrastructure and supporting amenities, to realise their potential.** Activating these strategic areas and **achieving effective density and consolidation, rather than more sprawl of urban development, is a top priority.**”*

The concept of Compact Growth underpins the overall strategy of the NPF. The concept is distilled as:

*“Making better use of **under-utilised land** and buildings, including ‘infill’, ‘brownfield’ and publicly owned sites and vacant and under-occupied buildings, with higher housing and jobs densities, better serviced by existing facilities and public transport... An increase in the proportion of more compact forms of growth in the development of settlements of all sizes, from the largest city to the smallest village, has the potential to make a transformational difference. It can bring new life and footfall, contribute to the viability of services, shops and public transport, increase housing supply and enable more people to be closer to employment and recreational opportunities, as well as to walk or cycle more and use the car less”*

The NPF advocates for balanced growth within towns, as set out in National Policy Objective (NPO) 7:

*“In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.”*

NPO 31 specifically promotes the provision of community infrastructure such as schools, colleges and childcare facilities to serve a growing population:

*“Prioritise the alignment of targeted and planned population and employment growth with invest in:*

*The provision of childcare facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, that meet the diverse needs of local populations;*

*The expansion and consolidation of Higher Education facilities, particularly where this will contribute to wider regional development, and*

*Programmes for life-long learning, especially in areas of higher education and further education and training where skills gaps are identified.”*

Furthermore, a National Strategic Outcome contained within the NPF relates to the provision of adequate community infrastructure and facilities:

*“Good access to a range of quality education and health services, relative to the scale of a region, city, town, neighbourhood or community is a defining characteristic of attractive,*



*successful and competitive places. Compact, smart growth in urban areas and strong and stable rural communities will enable the enhanced and effective provision of a range of accessible services.”*

To this end, NPO 4 is particularly relevant to the proposed rezoning:

*“Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.”*

## 4.2 Eastern and Midlands Regional Spatial and Economic Strategy 2019-2031

The Regional Spatial and Economic Strategy (RSES) is a strategic plan and investment framework to shape future growth and to better manage regional planning and economic development throughout the Region up to 2031. It identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives.

Swords is noted as a one of the Key Towns in the Region, which are defined as:

*“Large economically active service and/or county towns that **provide employment for their surrounding areas** and with high-quality transport links and the capacity to act as growth drivers to complement the Regional Growth Centres... **Development plans should provide for the sustainable, compact, sequential growth and urban regeneration in the town core of Key Towns by consolidating the built footprint through a focus on regeneration and development of identified key town centre infill/brownfield sites.**”*

Building upon the strategic role of Swords is emphasised:

*“The strategic regeneration of Swords offers an opportunity to build on the existing resilience of the local economy. There are opportunities to create a strategic employment node **maximising opportunity presented by Sword’s strategic location well served by air, Metrolink and the national road network.** Furthermore, Swords-Dublin Airport has developed as a key location for industry and **employment generating activities.** Ensuring high skilled employment opportunities for residents of Swords is a key objective. **Airport related activities will continue to be of major importance,** along with the protection and enhancement of access to Dublin Airport as a global gateway to the Region and the State.”*

The optimisation of under-utilised lands within Swords constitutes a Regional Policy Objective for the town:

*“RPO 4.29: Support the regeneration of underused town centre lands along with the planned and **sequential infill opportunities** to provide for high density and people intensive uses in **accessible locations that are accessible to high quality transport,** existing and planned, and to support the preparation of a local area plan for the strategic landbank at Lissenhall for the longer-term development of Swords.”*

Furthermore, following the completion of the Metrolink from Sandyford to Swords via Dublin City Centre, Swords, will become more accessible. This will enhance the town’s role as an employment centre of regional importance.

*“The Dublin region is a global hub for international investment and high value jobs in ICT, financial and business services while local enterprise and small and medium sized enterprises (SMEs) provide vital employment across the whole of the Region.”*

### 4.3 Fingal County Development Plan 2017-2023

Under the current Development Plan, the provision of adequate community facilities forms part of the Council’s Strategic Vision for the County:

*“Encourage inclusive and active sustainable communities based around a strong network of community facilities.”*

The importance of community facilities is reiterated in Chapter 3 of the Plan, where the following is stated:

*“The provision of good community facilities and services, such as education, training, libraries, childcare facilities, places of worship, health and community centres, in appropriate accessible locations is important as they contribute positively to an enhanced quality of life. The Regional Planning Guidelines require Planning Authorities to adopt objectives that facilitate the social, community and cultural needs of all persons and communities through the provision of well dispersed and easily accessible social and community infrastructure.”*

Furthermore, Objective PM66 states that the Council should:

*“ensure provision of accessible, adequate and diverse community facilities and services in new and established areas to provide for the well-being of residents.”*

Objective PM71 clearly prioritises community centres where they are needed:

*“Support the provision of new community centres and facilitate the refurbishment and extension of facilities where there is a need for such works.”*

Swords is designated as a “Metropolitan Consolidation Town”:

*“Swords, Fingal’s County town, is identified as a Level 2 ‘Major Town Centre’ in the Retail Strategy for the Greater Dublin Area and has a well-developed retail offering which includes the Pavilions Shopping Centre and Airside Retail Park. The town also benefits from its close proximity to Dublin Airport and has a strong industrial base which underpins its role as an important centre for employment in the County. One of Swords key strengths is the quality of road infrastructure serving the town. Direct access to the M1 motorway on the Dublin-Belfast economic corridor is complemented by a high quality regional road network (R125 & R132 dual carriageways). The NTA and TII are also currently progressing plans to develop the indicative route for new Metro North to serve the town.”*

## 5.0 Justification & Grounds of Submission

Along shown below, the northern part of the subject site is zoned “RS - Residential” while the southern part is zoned “GB – Green Belt”.

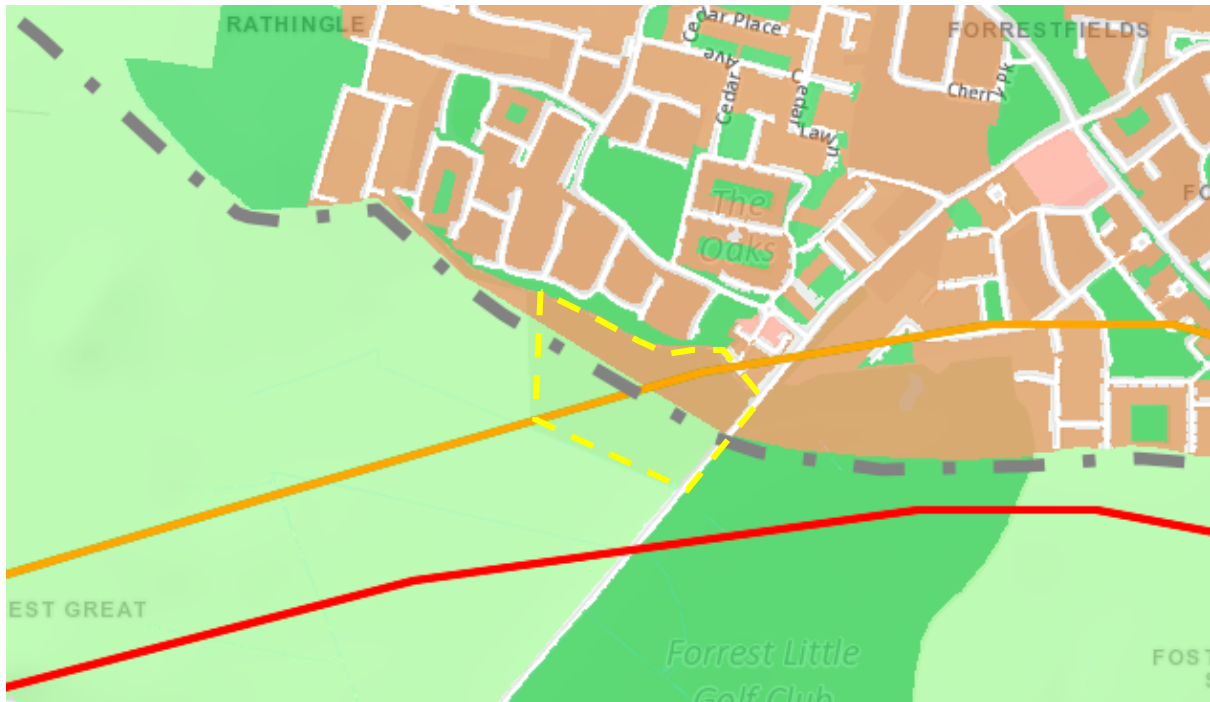


Fig. 2 – Zoning Map, Draft Development Plan 2023-2029

As shown below, there are no CI-zoned lands within the southwestern corner of Swords.

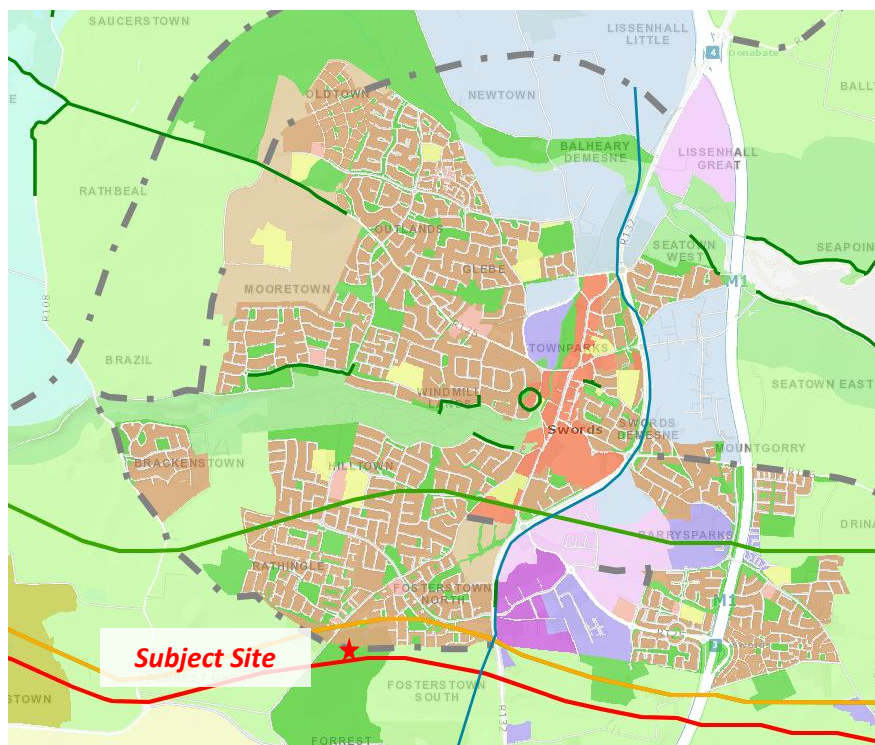


Fig. 3 – Lack of “CI – Community Infrastructure” zoned land around subject site



A cursory search on Google shows that there are no schools within the area.

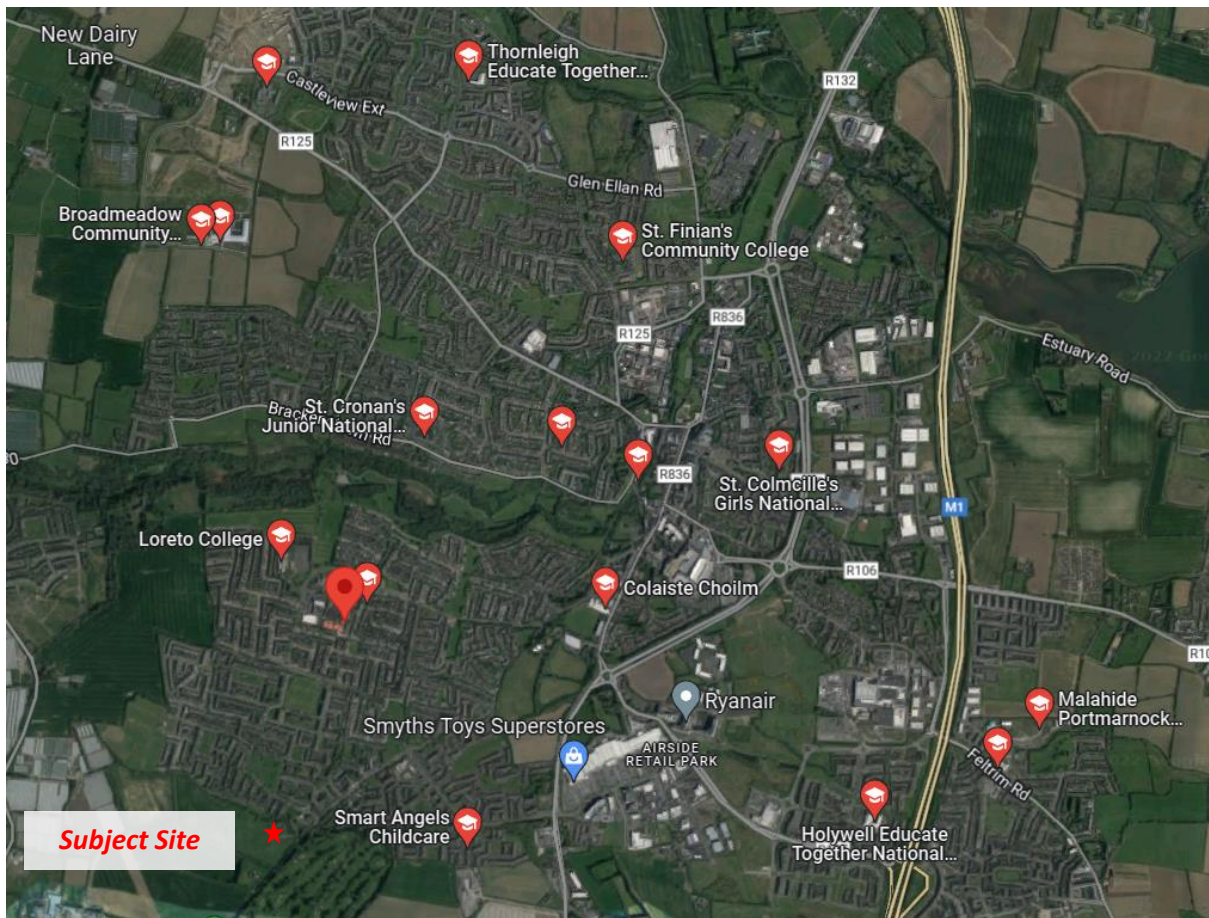


Fig. 2 – Lack of educational facilities around subject site

Furthermore, there is only one small creche (Tigers Childcare Ridgewood) within the area.

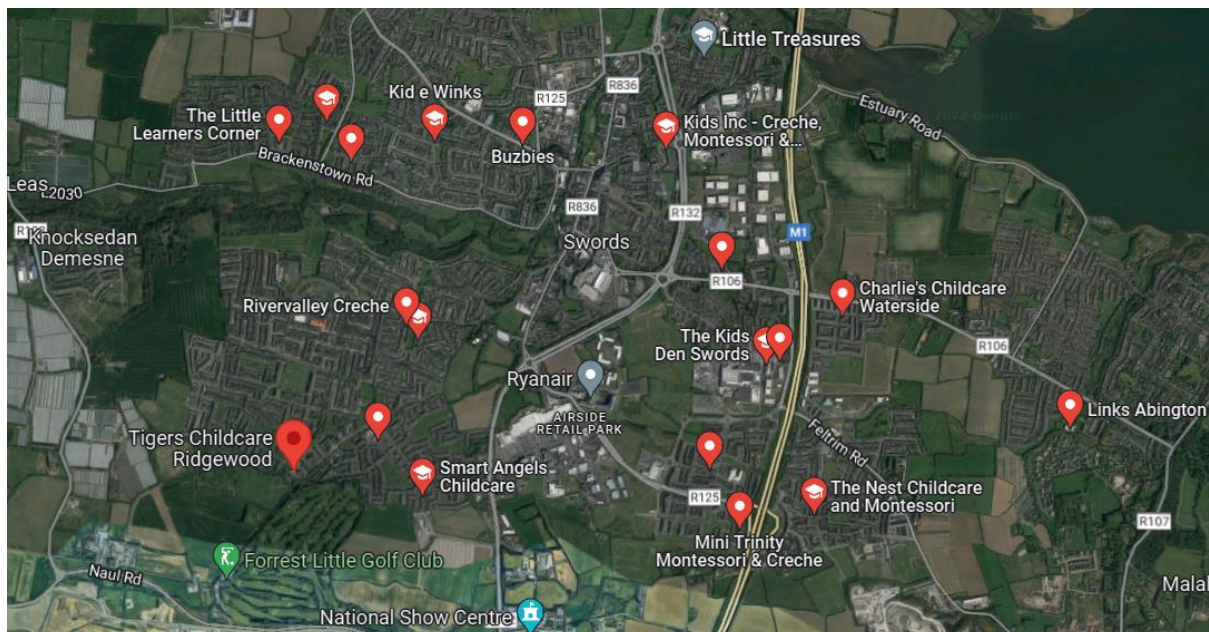


Fig. 2 – Lack of childcare facilities around subject site



With the removal of Map Based Local Objective No. 54, there will now be scope for the development of residential accommodation within the northern part of the subject site. However, given that there is already a lack of community infrastructure uses (childcare, community centres, etc), the development of the northern part of the subject site will further increase the demand for such uses in this area.

Under the CI – Community Infrastructure zoning, the following uses would be permitted in principle:

Permitted in Principle		
Childcare Facilities	Community Facility	Cultural Facility
Education	Health Centre <sup>19</sup>	Hospital <sup>19</sup>
Open Space	Place of Worship	Residential Care Home/ Retirement Home
Sheltered Accommodation	Utility Installations	

Fig. 2 – Permitted in Principle uses in lands zoned “CI – Community Infrastructure”

The rezoning of the southern part of the subject site to CI would allow for the provision of essential community facilities in an area where they are lacking. The provision of CI-zoned land within the subject site could serve to counterbalance the concentration of CI-zoned lands elsewhere in Swords, thereby resulting in an even provision of community infrastructure serving all c. 40,000 of the town’s residents.

## 6.0 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, Gerry Gannon, in relation to their site within the southwestern corner of Swords, Co. Dublin.

This submission asserts that the southern part of the subject site should be rezoned from “GB – Green Belt” to “CI – Community Infrastructure” so as to ensure that an adequate supply of community facilities can be provided to existing and future residents of the surrounding area. Currently, there are no CI-zoned lands nearby – while there are CI-zoned lands throughout the rest of Swords, there are none within the southwestern part of the town. The lack of appropriate community facilities in this area risks marginalising part of the local population; furthermore, the demand for such facilities will increase, now that Map Based Local Objective No. 54 has been removed and the northern part of the subject site can now be developed for residential development. As such, the proposed rezoning of part of the subject site to CI would allow for the provision of childcare, educational, and other vital community facilities and infrastructure needed in this part of Swords for both existing and future residents of the area.

Downey trust that you will take the grounds of this submission into consideration when preparing the next Fingal County Development Plan 2023-2029.