

DUBLIN COUNTY COUNCIL
Planning Department

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Submission to the Draft Fingal Development Plan 2023-2029

Lands at Blackwood Lane, Malahide, Co. Dublin

Undertaken by:

O'Connor Whelan Limited

On behalf of:

Simon Cooper and Niall Morris, [REDACTED]
[REDACTED]

May 2022

PLANNING CONSULTANTS

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1.0 Introduction

On behalf of Simon Cooper and Niall Morris, [REDACTED], O'Connor Whelan Limited 222-224 Harold's Cross Road, Dublin 6W, wishes to make a submission to the Draft Fingal Development Plan 2023-2029.

This submission relates to lands at Blackwood Lane, Malahide, Co. Dublin, [REDACTED]

The lands are currently zoned Green Belt in the Draft Plan. This submission seeks to have these lands zoned Residential.

The basis for this proposed zoning is:

- The provision of residential development on this site would comply with national, regional and local policy with regard to housing.
- The site is not a green belt as it is located in a residential area.
- The location adjoining the built-up area of Malahide and its location in proximity to public transport warrants its redevelopment for additional residential development.

2.0 Site Description

The lands in question have an area of 1.70 hectares. The lands are located east of the R124, immediately north of Blackwood Lane, and immediately south of the built-up area of Malahide (see figures 1 and 2).

The lands are in agricultural use. They are roughly rectangular in shape and lined by trees and hedgerows on the eastern and southern boundaries, and an agricultural lane on the northern boundary.

An Indicative Site Plan has been undertaken by Darragh Lynch Architects. This indicates that approximately 85 residential units, at a density of 50 units per hectare, could be accommodated on the site, subject to planning, (see figure 3 below).



Figure 1: Site Location

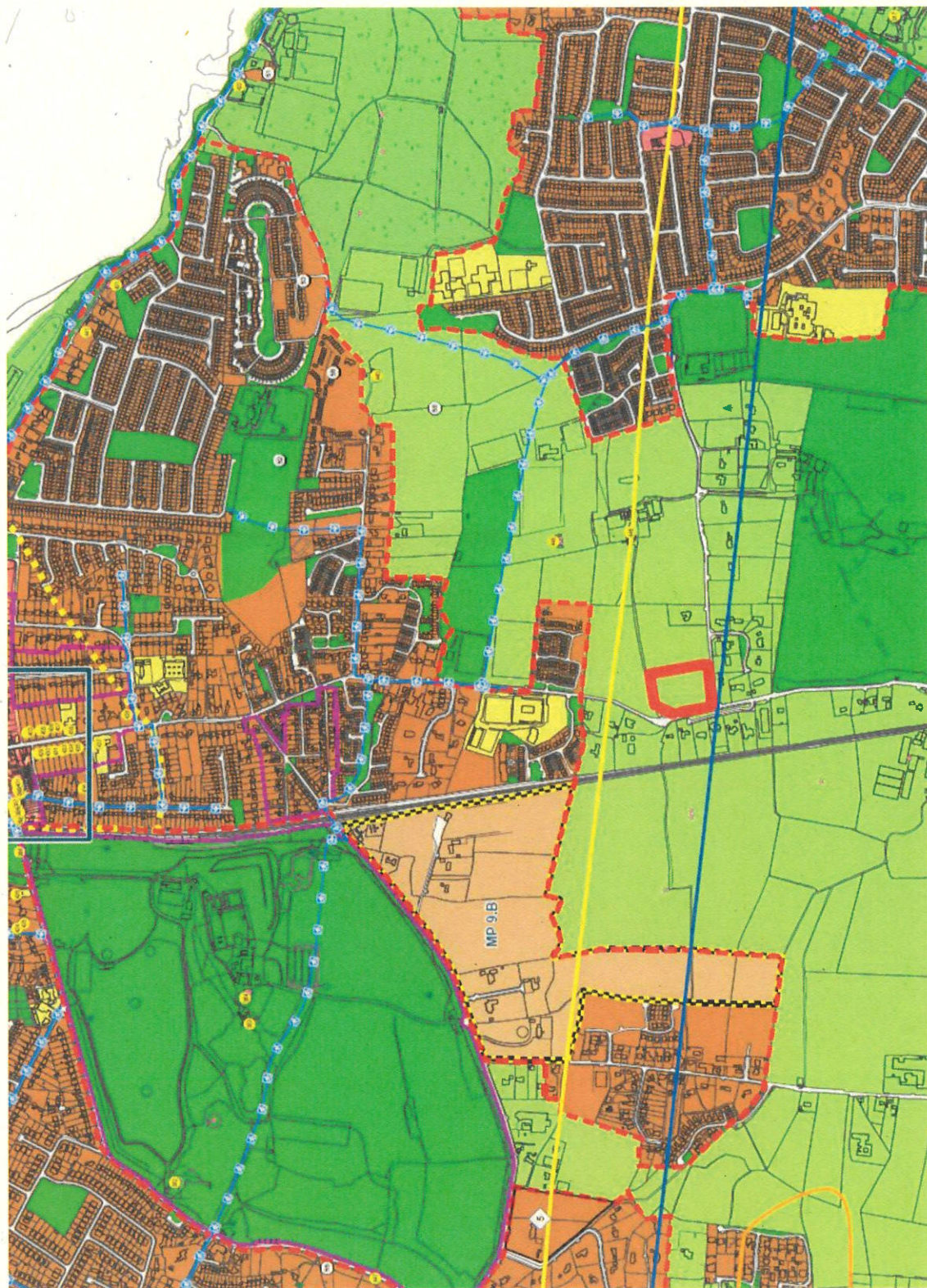
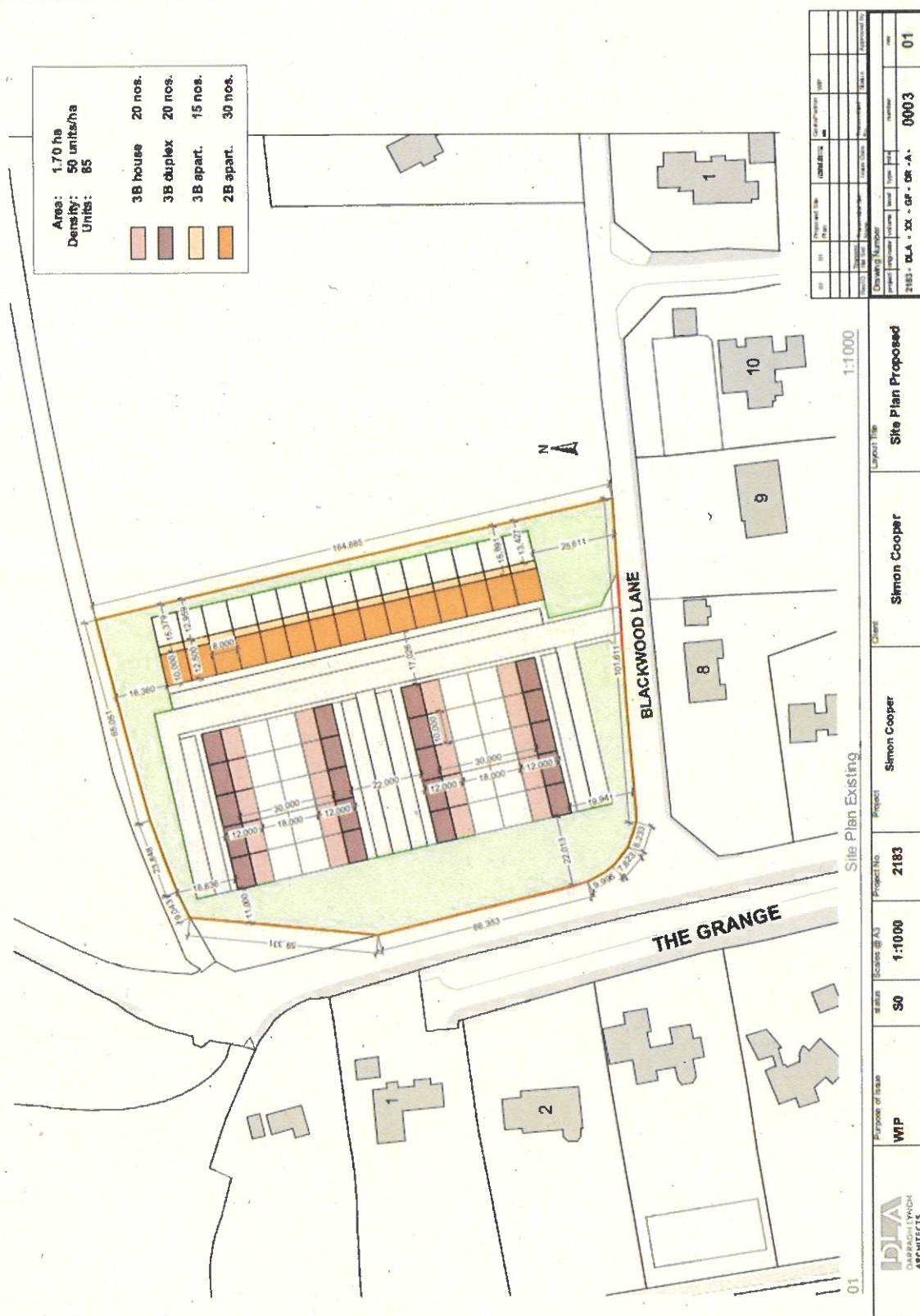


Figure 2: Site as per the Draft Development Plan (approximate boundaries outline in red)



2.0 Policy Context

2.1 Project Ireland 2040: National Planning Framework

The **National Planning Framework (NPF)** is the Government's high-level strategic plan for shaping the future growth and development to the year 2040. As stated:

"By 2040 there will be roughly an extra one million people living in our country. This population growth will require hundreds of thousands of new jobs and new homes. If we fail to plan for this growth and for the demands it will place on our built and natural environment, as well as on our social and economic fabric, then we will certainly fail in our responsibility to future generations of Irish men and Irish women."

One of the strategic outcomes in the NDF is 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 NDF states that the location of housing has taken on a dispersed and fragmented character which has led to people living further away from their jobs and often being at a sizeable remove from important services such as education and healthcare.

National Policy Objective 33 states:

"Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location."

This submission demonstrates that residential provision at this location, adjoining a built-up area with excellent public transport links, will comply with the vision and objectives out in the NDF.

2.2 Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region 2019-2031

The Regional Spatial and Economic Strategy (RSES) is a strategic plan and investment framework to shape the future development of the Region to 2031.

The Vision is:

"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 contains 16 Regional Strategic Outcomes, the following of which are directly relevant:

"2. Compact Growth and Urban Regeneration

Promote the regeneration of our cities, towns and villages by making better use of under-used land and buildings within the existing built-up urban footprint and to drive the delivery of quality housing and employment choice for the Region's citizens. (NSO 1)

6. Integrated Transport and Land Use

Promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning. (NSO 2, 6, 8,9)"

As outlined below, the provision of increased residential density on this site will comply with the objectives of the RSES.

2.3 Draft Fingal County Development Plan 2023-2029

The Draft Development Plan has four strategic objectives:

- Ensures the sustainable use of natural resources;
- Enables us to live within the area's environmental capacity;
- Enables and enhances our resilience to climate change; and,
- Creates a more open, diverse and inclusive society.

The following "interlinked" strategic objective is directly relevant:

"Continue the development of a network of well-serviced, well-connected, sustainable neighbourhoods which have a range of facilities, a choice of tenure and universally designed adaptable house types, promote social inclusion and integration of all minority communities."

As this site is effectively in a residential area, in close proximity to public transport infrastructure, increased density of development will contribute to the growth of sustainable neighbourhoods, close to the built-up area of Malahide with its range of facilities.

3.0 Existing Site Location

Contrary to the description in the Draft Development Plan, the exiting site is not Green Belt. It is very located in a residential area, with housing to the south and west. As shown in figure 2 above, the site and surrounding lands are residential in nature.

The redevelopment of higher density residential would be in compliance with the proper planning and development of the area. This is only possible if the site is rezoned to residential development, as the incorrect Green Belt zoning, inhibits the redevelopment of this residential site.

Given the existing use of the site, its location adjoining the Malahide built up area, we urge Fingal County Council to afford it the correct zoning.

The main issue with not enabling the correct zoning on this site is that, particularly given the housing crisis, urban sprawl will occur in neighbouring counties around Dublin. This will result in unsustainable urban development.

The main issue with not enabling the correct zoning on this site is that, particularly given the housing crisis, urban sprawl will occur in neighbouring counties around Dublin. This will result in unsustainable urban development.

4.0 Location Adjoining Malahide

The location adjoining the built-up area of Malahide and its location in proximity to public transport warrants its redevelopment for additional residential development.

The site is located on the R124, 90m metres from the development area of Malahide. The site entrance is located 1.9 km from Malahide DART station, and approximately 1.5 km from Malahide Village centre. The no. 2 bus route runs along the R124 with services at every 20 minutes.

The site adjoins Malahide Community School, with Saint Oliver Plunkett school and St Andrews Primary school in close proximity. It is also in close proximity to other facilities such as Malahide Demesne and St Sylvester's GAA club.

Given the proximity of all these facilities and the public transport links to and from the site, we believe that Green Belt is the incorrect zoning for the site. The site location alone and its proximity to transport, employment and community facilities should ensure that the site is zoned residential, allowing for the development of additional residential development that will benefit the entire Malahide area.

5.0 Conclusions

This submission relates to lands at Blackwood Lane, Malahide, Co. Dublin, owned by Simon Cooper and Niall Morris, 1 Fairways Avenue, Griffith Road, Ballygall, Dublin 11.

The lands are currently zoned Green Belt in the Draft Plan. This submission seeks to have these lands zoned Residential.

The basis for this proposed zoning is:

- The provision of residential development on this site would comply with national, regional and local policy with regard to housing.
- The site is not a green belt as it is located in a residential area.
- The location adjoining the built-up area of Malahide and its location in proximity to public transport warrants its redevelopment for additional residential development.

The rezoning of the lands could result in up to 85 units, as outlined in the indicative site plan prepared by Darragh Lynch Architects (figure 3 above). These units will make a contribution to the housing crisis in Dublin and also the Malahide community.

In this regard, we urge Fingal County Council to alter the zoning in the current Draft Fingal Development Plan.

Signed

A handwritten signature in blue ink, appearing to read 'Alan Whelan'.

Alan Whelan
O'Connor Whelan