

O'CONNOR  
WHELAN

## Submission to the Draft Fingal Development Plan 2023-2029

Lands at Malindi House, Estuary Road, Swords, Co.  
Dublin, K67 RH73

Undertaken by:

O'Connor Whelan Limited

On behalf of:

Dan Desmond, [REDACTED]  
[REDACTED]

May 2022

PLANNING CONSULTANTS

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## 1.0 Introduction

On behalf of Dan Desmond, 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 Malindi House, Estuary Road, Swords, Co. Dublin, K67 RH73, [REDACTED]

The lands are currently zoned High Amenity 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 are is High Amenity land but is a current residential site.
- The location adjoining the built-up area of Swords 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 2.27 hectares. They are located west of Estuary Road, immediately east of the Swords sewerage treatment plant, and north of the Gartan residential estate (see figures 1 and 2). The lands are immediately north and east of the built-up area of Swords.

The lands contain a single residential unit.

There is a wayleave running though the site from the adjoining sewerage treatment plant.

An Indicative Site Plan has been undertaken by Darragh Lynch Architects. This indicates that approximately 107 residential units could be accommodated on the site, subject to planning, and taking account the wayleave through the site (see figure 3 below).



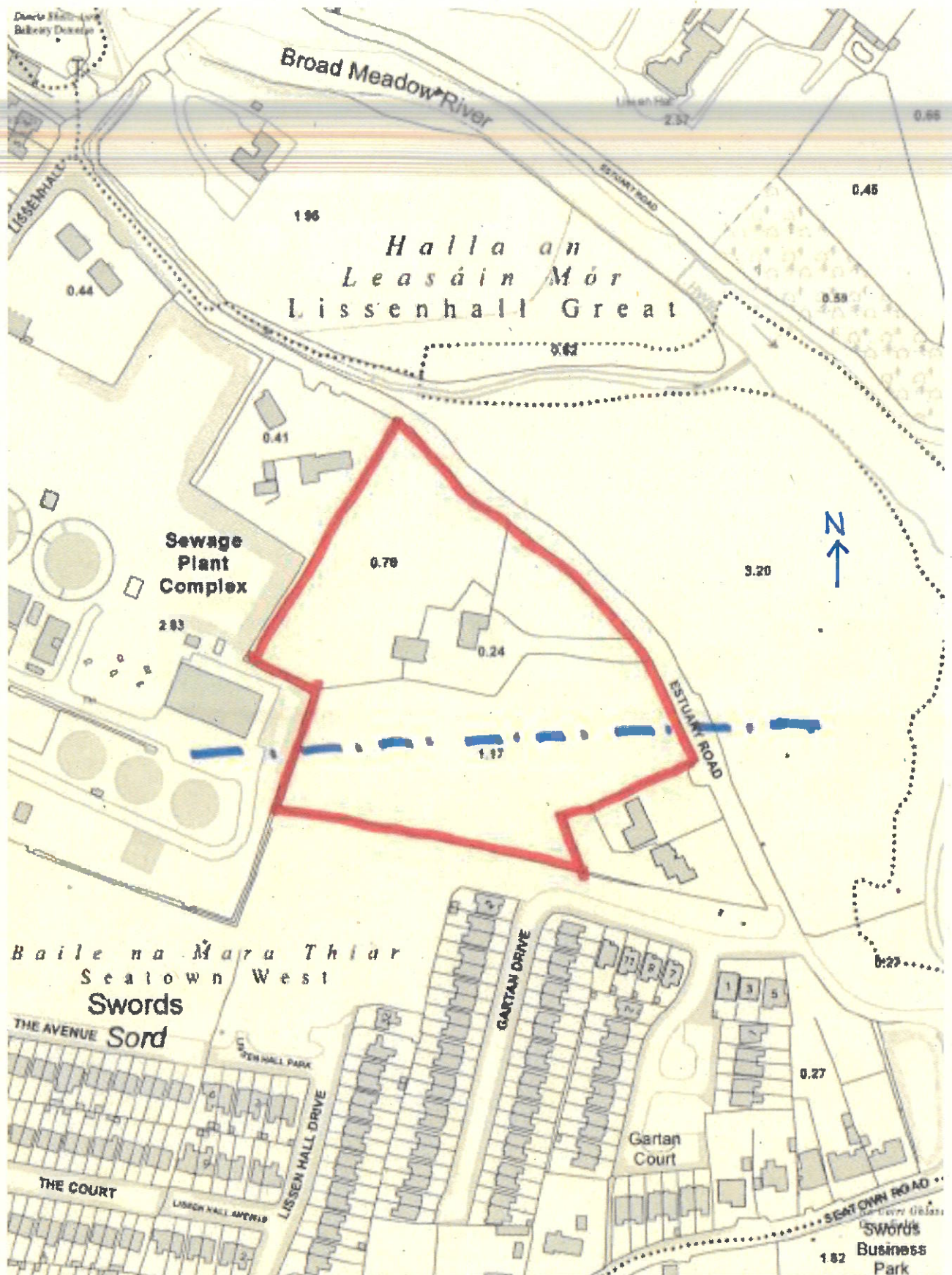


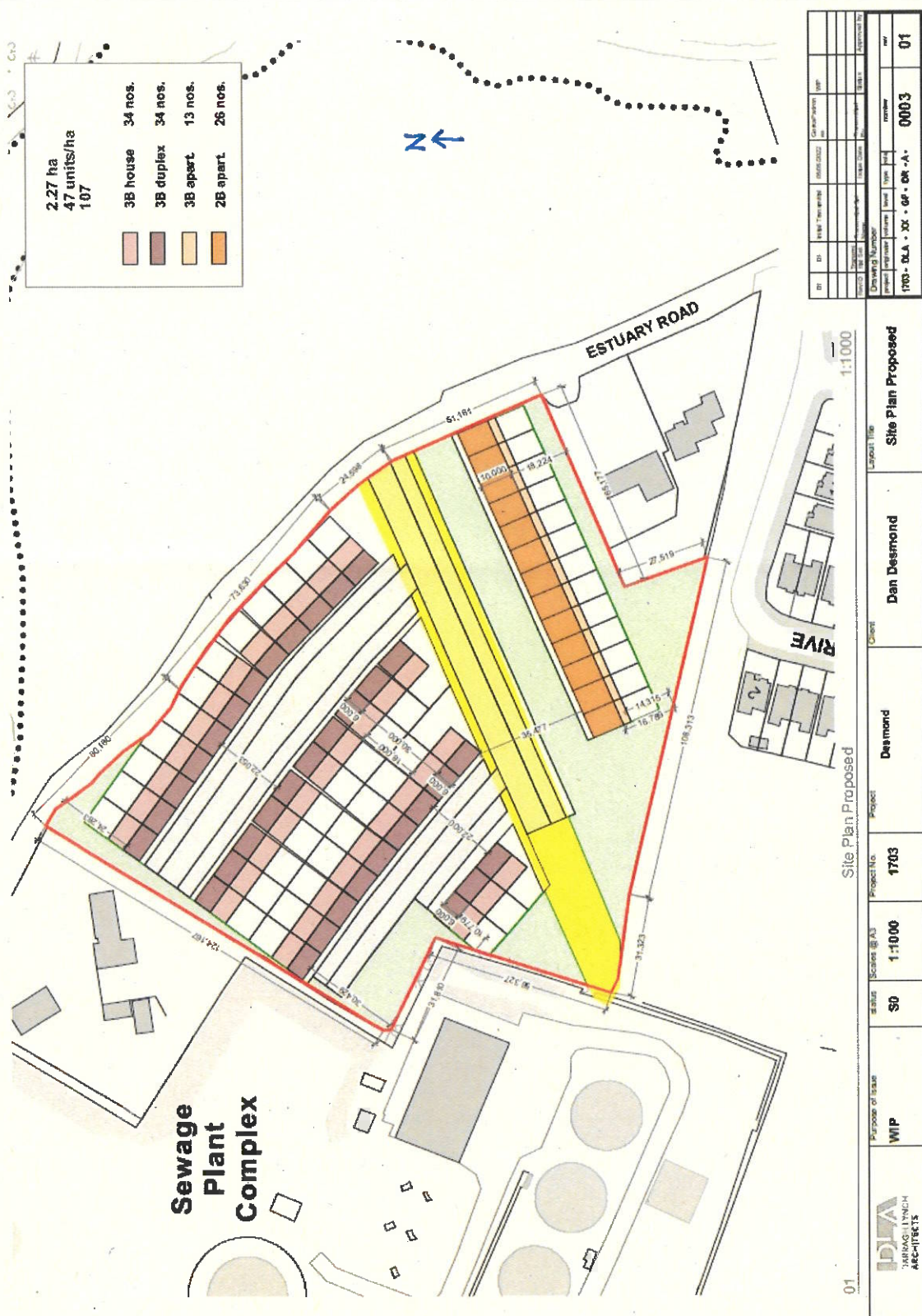
Figure 1: Site Location (the blue line reflects the wayleave through the site)





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 an existing residential site, 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 Swords with its range of facilities.

### 3.0 Existing Residential Site

Contrary to the description in the Draft Development Plan, the existing site are not High Amenity lands. It is a residential site, on which an existing dwelling exists, directly adjoining a sewage treatment plant and an existing residential estate. As shown in figure 2 above, the lands immediately to the south are zoned residential.

The sewage treatment plant is also zoned High Amenity, which illustrates the incorrect zoning of lands in this area. The High Amenity zoning of the lands may be historic, but it demonstrates that the zoning has not been updated to reflect current uses, and indeed current needs in terms of the provision of housing. As outlined in figure 3 above the site could deliver 107 no. dwellings, subject to planning. This is considered a reasonable contribution to the housing crisis in Dublin and Ireland.

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 High Amenity zoning, inhibits the redevelopment of this residential site.

Given the existing use of the site, its location adjoining Swords, 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.

#### **4.0 Site Location**

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

The site is located less than a kilometre from the Major Town Centre zoning of Swords town. As shown in figure 2 it is in close proximity to numerous employment locations to the south and west.

The site is located within walking distance of a numerous Dublin Bus route including:

- 33
- 33a
- 33b
- 41c
- 43
- 500
- 506

These routes will allow passengers to travel anywhere in Dublin.

The site is also in close proximity to many other retail, employment and recreational facilities.

Given the proximity of all these facilities and the public transport links to and from the site, the location and the current residential use of the site, we believe that High Amenity is the incorrect zoning for the site. The site location alone and its current use should ensure that the site is zoned residential, allowing for the development of additional residential development that will benefit Swords and the surrounding area.



## 5.0 Conclusions

This submission relates to lands at Malindi House, Estuary Road, Swords, Co. Dublin, K67 RH73, [REDACTED]

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

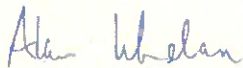
The basis for this proposed zoning is:

- The provision of residential development on this site would comply with national, regional and local policy with regard to housing.
- The site are not High Amenity lands but is a current residential site.
- The location adjoining the built-up area of Swords 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 107 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 Swords community.

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

Signed



Alan Whelan  
O'Connor Whelan