Senior Executive Officer, Planning and Strategic Infrastructure Department, Fingal County Council, County Hall, Main Street, Swords,

County Dublin. K67X8Y2

Customer Care Unit

0 9 MAY 2022

Fingal County Council



Submission on 2023-2029 Fingal Draft Development Plan

Dear Sir/Madam,

We, the undersigned, are residents of the Effelstown and Rathartan townlands of Lusk, both of which are in close proximity to Rush and Lusk train station. We welcome the opportunity to bring the following matters to your attention for consideration in the finalisation of the 2023-2029 Fingal Development Plan.

Planning for Growth - Core Strategy

Extracts from 2023-2029 Fingal Draft Development Plan:

Section 2 - PLANNING FOR GROWTH CORE STRATEGY

2.7 SETTLEMENT STRATEGY - Lusk

... Existing and future development will be consolidated within well-defined town boundaries and the distinct physical separation of Rush and Lusk will be maintained.

Self-Sustaining Towns Policies

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.

Objective CSO58 - Maintenance of Distinct Physical Separation - Lusk, Rush and Malahide Ensure that existing and future development within the settlements of Lusk, Rush and Malahide is consolidated within well-defined town boundaries to maintain their distinct physical separation.

We are fully supportive of the policies and objectives contained within the draft development plan which set out to consolidate development of Lusk and Rush within well-defined town boundaries to maintain their distinct physical separation and unique identities.

Development leakage beyond well-defined boundaries leads to urban sprawl and all its associated negative implications for the environment and society in general, not least of which is the loss of community identity, the destruction of the rural environment and the contraction of the productive capacity of the agriculture and horticulture sectors, both of which are sectors of the local economy that are of national importance in the food supply chain.

While the referenced policies and objectives seek to consolidate the development of Rush and Lusk within clearly defined boundaries, it is important to recognise the proximity of both towns to Rush and Lusk train station. Any development at or near to the train station in the direction of either Rush or Lusk would significantly foreshorten the landscape between the towns and the station and consequently it would foreshorten the landscape between both towns. Were this to occur it would be extremely injurious to the principal objective of preserving the unique identities of Rush and Lusk.

Accordingly, to ensure the separation of Lusk from Rush and to protect the unique identities of both towns nothing contained in or emanating from the 2023 to 2029 Fingal Development Plan should contribute to or facilitate development in the environs of Rush and Lusk train station.

Green infrastructure and natural heritage.

Extracts from 2023-2029 Fingal Draft Development Plan:

Objective GINHO4 – Green Infrastructure and Development
Resist development that would fragment or prejudice the County's strategic Green Infrastructure network.

Objective GINHO5 - Pollinator Plan

Continue to support the provisions of the National Pollinator Plan 2021-2025 through the management and monitoring of the County's pollinator protection sites and through the promotion of additional pollinator sites during the lifetime of this Development Plan.

Objective GINHO6 – Agriculture and Horticulture
Safeguard important agricultural and horticultural lands in the County.

We are broadly supportive of these objectives as they apply to the entirety of Fingal. They are of particular relevance to the agriculture and horticulture sectors and the local communities of Rush and Lusk, which are at the heart of the national food production chain.

A sideroad off the R128 to the east of the train station, known locally as *John Martin's Lane*, runs north-west through the townlands of Effelstown; Rathartan; Knightstown and Horestone.

At the Effelstown end the road is particularly narrow where it passes a protected structure — ref. no. 290 (Stables and Coach House complex). It then crosses a local river via a recently restored stone bridge and continues to twist and undulate, crossing and running adjacent to the Dublin to Belfast railway line for some distance. The local land is of the finest quality in Fingal and is intensively used for agriculture and horticulture.

In addition to providing access to key agriculture and horticulture lands the road is of very important amenity value to the communities of Rush and Lusk. The road forms part of several very popular walking and cycling routes radiating from both towns into the local countryside and it is bounded by

lush hedgerows and biodiversity, together with significant views and prospects to the coast and inland towards the north Fingal uplands from the road itself and from the Dublin to Belfast railway line.

The road is not capable of supporting any increase in traffic volume or vehicle size, accordingly any intensification of land usage in the wider environs of the nearby train station would have a very detrimental impact on the road's important role in providing access to key agriculture and horticulture lands and the natural and attractive amenity it provides for the communities of Rush and Lusk.

We therefore submit that in addition to the preservation of the separation of Rush from Lusk and the protection of the individual identities of both towns, the preservation of the rural environment in the vicinity of the Rush and Lusk train station is imperative to safeguarding important agriculture and horticulture lands and the conservation and protection of a vital environmental amenity for the communities of both towns.

It is crucial to the objectives of the Development Plan for both towns and for the agriculture and horticulture sectors that the RU (Rural) zoning for lands between the two towns is maintained in its entirety.

Connectivity and Movement.

Extracts from 2023-2029 Fingal Draft Development Plan:

Objective CMO5 – Improvements to the Pedestrian and Cyclist Environment,
Maintain and improve the pedestrian and cyclist environment and promote the development
of a network of pedestrian/cycle routes which link residential areas with schools, employment,
recreational destinations and public transport stops to create a pedestrian/cyclist environment that
is safe, accessible to all in accordance with best accessibility practice.

Objective CMO6 – Integration of Active Travel with Public Transport
Work with the relevant transport providers, agencies and stakeholders to facilitate the integration
of active travel (walking/cycling etc.) with public transport, ensuring ease of access for all.

Policy CMP18 - Public Transport

Support the provision of a high-quality public transportation system that is accessible to all to serve the needs of the County and to enable a significant shift from car-based travel to public transport.

We also support these broad objectives in the draft Development Plan in support of the integration of active travel and public transport. However, such is the deficit of safety protections at Rush and Lusk train station to protect pedestrians and cyclists accessing this key local interchange with the rail network we are of the opinion that specific objectives should be included in the Development Plan to improve overall road safety in the vicinity of the train station.

In this regard there is an urgent need to introduce overall traffic calming measures on the approaches to the train station and to provide a pedestrian crossing on the Rush side. Adequate provision should be made on both sides of the station to allow busses to pull-in and set down/pick-up passengers safely while not causing an obstruction on the roadway itself. Also, the exit from the station carpark on the Rush side should be realigned so as to allow cars exiting the carpark to do so at right angles to the road.

We also note the absence of the indicative pedestrian and cycling routes from Rush and Lusk to the train Station that were included in the 2017-2023 development plan and believe they should be included in the 2023-2029 development plan.

We would appreciate if this submission were given due consideration and the issues raised are included in the finalised version of the 2023-2029 Fingal Development Plan.

Yours sincerely,

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