

# TOWN PLANNING SUBMISSION



## Stage 3 – Proposed Material Alterations

DRAFT FINGAL DEVELOPMENT PLAN  
2023 – 2029

**Lands within Kilbarrack Industrial Estate,  
South of the Sutton-Howth Railway Line,  
Kilbarrack,  
Co. Dublin**

December 2022

Submitted on Behalf of:

Murdock, Builders Merchants (Ireland) Ltd.  
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## 1.0 Introduction

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2 have been instructed by our clients, Murdock, Builders Merchants (Ireland) Ltd., to make a submission on the proposed Material Alterations to the Draft Fingal Development Plan 2023-2029, with respect to lands at the existing Kilbarrack Industrial Estate, Kilbarrack, Co. Dublin. Stage 3 of the plan-making process, the Proposed Material Alterations to the Draft Plan, originated from the consideration of the submissions received by the Planning Authority between February and May 2022 on the Draft Development Plan 2023-2029. The Chief Executive's Report was considered by the Elected Members at Special Council Meetings held in September and October 2022, where they resolved to amend the Draft Plan.

Subsequently, and in accordance with Section 12(7)(b) of the Planning and Development Act 2000 (as amended), the Proposed Material Alterations we published on the 11<sup>th</sup> November. This submission has been prepared in response to public notices dated 11<sup>th</sup> and 24<sup>th</sup> November respectively, inviting submissions from interested parties, up until 22<sup>nd</sup> December 2022, in relation to the proposed Material Alterations to the Draft Fingal Development Plan 2023-2029.

More specifically, this submission has regard to the proposed rezoning of the lands featuring within the Kilbarrack Industrial Estate which is included within the Proposed Material Alterations (Alteration No. **PA SH 10.1**) to the Fingal Development Plan 2023-2029. To give further context, we note that the proposed rezoning of these lands, as included within the Proposed Material Alterations (Stage 3) is from '**GE – General Employment**' to '**MRE – Metro and Rail Economic Corridor**' with an associated masterplan designation at Kilbarrack Industrial Estate. It is noteworthy that prior to the inclusion of this Proposed Material Alteration, the Chief Executives Report prepared in response to the consultation process on the Draft Plan recommended that the Kilbarrack Industrial Estate lands be rezoned from 'GE' to 'RA – Residential Area', as part of Chief Executive's Recommendation **CE SH 10.3**.

This submission fully welcomes the proposed rezoning of the Kilbarrack Industrial Estate lands and commends the Planning Authority for supporting same as part of the plan-making process. The lands are highly accessible, being located just south of the Sutton-Howth rail line with access easily available to Howth Junction and Donaghmede Train Station, and adjoining existing and established residential areas. The forthcoming delivery of the Dart + Coastal North Project will also further enhance connectivity to and from these lands. In this regard, it is submitted that the rezoning of the lands to 'MRE' is entirely appropriate.

Overall, our client wholly supports the proposed rezoning of the Kilbarrack Industrial Estate lands and requests that this rezoning is implemented in the final adopted Fingal County Development Plan 2023-2029.

## 2.0 Submission Lands

This submission relates to approximately 7.5 Hectares (c. 18.5 acres) of industrial lands, zoned '**GE – General Employment**' in the current Fingal Development Plan 2017-202, located at Kilbarrack, south of the Sutton-Howth railway line. The lands are bound to the north and west by rail and to the east and south by residential land uses.

here are a variety of business operating within the submission lands. Our client owns approximately 0.63 Hectares (c. 1.56 acres) of land located on the eastern side of Kilbarrack Parade, c. 150 metres north from the junction with the R104. The subject lands are currently home to a Murdock Builders Merchants and operated by our clients. Murdock Builders Merchants is a leading supplier to the construction industry in Ireland, supplying both trade and DIY customers.

The lands are highly accessibly and, benefit from road frontage along the Kilbarrack Parade, Kilbarrack Road and other internal roads which serve the industrial units. Vehicular access is provided to each unit. Kilbarrack is located approximately 1.2km north of the submission lands which contains a large and growing population and workforce. Access to the submission lands from Kilbarrack is a short 4 minute drive or a 6 minute cycle. Baldoyle, Donaghmede and Raheny are also located within similar distance, further increasing potential workers.



The images displayed overleaf outline the submission lands boundary in the context of its immediate and wider location.



Figure 1.0 Aerial image of the submission lands, red outline, in their immediate context.



Figure 2.0 Aerial image of the submission lands, black outline, in the context of surrounding zoning objectives in the area. The lands are zoned 'GE' and adjoin 'GE' lands, 'OS' lands and 'RS' lands as per the current Fingal Development Plan 201702923. 'Z1' zoned lands (Residential) are also located in proximity to the lands.



The neighbouring lands to the immediate north of the submission lands are a continuation of the industrial park with a range of services being provided. To the south, the lands adjoin Naomh Barróg GAA Club. To the east, the lands adjoin an established and mature residential area, demonstrating the liveability of the area. In considering the more recent national and regional policy focus on delivering compact and sustainable growth in areas which are proximate to public transport corridors, it is considered that the present use of the lands for commercial premises represents an underutilisation of prime located serviced lands which have the capacity to accommodate a portion of Dublin’s future population growth and to deliver the much needed additional residential units and supporting social infrastructure over the coming years.



Figure 3.0 Aerial image indicating the submission lands in the context of its wider environment.



Figure 4.0 Aerial view of our clients’ property within the submission lands showing its surrounding context.





Figure 5.0 Street view image of the existing access from Kilbarrack Parade to our clients' lands.



Figure 6.0 Access to the train station from within the submission lands.

In terms of the site's wider locational context, it is noted that the lands are situated approximately 600 metres north of Raheny village, which provides for a number of services and facilities, including a supermarket, dentist, café, take-away, pharmacy, hairdressers and other essential and non-essential services. Dublin City Centre is located approximately 8km southwest of the submission lands.

With regards to public transport there are numerous serviced bus stops and train stations within walking distance from the submission lands. The Howth Junction and Donaghmede train station is located within a 300m (3-minute walk) distance of the submission lands which services the Dublin-Dundalk commuter line and the DART commuter line. The lands area also proximate to the Bayside and Kilbarrack train stations. It is clear that the site is well served by existing road and public transport infrastructure, is within easy reach of Dublin City Centre and the neighbouring key metropolitan town of Blanchardstown, making it an ideal location for the provision of addition residential/mixed-use development.

It is submitted that this significant landbank represents a body of high capacity and potential lands which, through appropriate rezoning and pro-active plan-led guidance, can be designed to accommodate a significant quantum of residential development and mixed-uses, in line with the aims and objectives set down in both the Project Ireland 2040 National Planning Framework and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Regional Assembly.

### 3.0 Material Alterations to Draft Development Plan

The proposed changes to the Fingal Development Plan, as part of the Material Alterations (Stage 3) are set out by Chapter under Part 2 and Part 3 of the 'Proposed Material Alterations' document published by Fingal County Council on 11<sup>th</sup> November. As noted from the outset of this submission, there a number of amendments proposed pertaining to *Map Sheet 10: Baldoyle-Howth*, including Proposed Amendment **PA SH 10.1** relating to the Kilbarrack Industrial Estate, which reads as follows:

#### **PA SH 10.1:**

***'Amend zoning from GE-General Employment to MRE-Metro and Rail Economic Corridor with a masterplan designation at Kilbarrack Industrial Estate. Update Table 2.18 and the boundary for Framework Plan FP10.A accordingly'***

In accordance with the above proposed amendment, Table 2.18 of the Draft Plan has also been revised under **PA CH 2.12** as follows:

<b>Table 2.18 Schedule of Masterplans to be Commenced over the Plan Period</b>
Garristown
Oldtown
Rowlestown
Balrothery East
<b>Estuary Central</b>
<b>Estuary East</b>
Old School House, Clonsilla
Ballyboghil
Naul
<b>Kilbarrack Industrial Estate</b>

The zoning map extract below (Sheet No. 10 Baldoyle/Howth) outlines the area of the Kilbarrack Industrial Estate which is subject to Material Alteration **PA SH 10.1**.



Figure 7.0 Extract of Map sheet 10 as amended by the Proposed Material Alterations to Draft Fingal Development Plan 2023-2029. The lands at Kilbarrack Industrial Estate are proposed to be rezoned from 'GE – General Employment' to 'MRE – Metro and Rail Economic Corridor'.



Also of relevance to the above and the proposed 'MRE' zoning objective, is Proposed Material Alterations **PA CH 13.10**, **PA CH13.11** and **PA CH 13.12** as follows:

**PA CH 13.10: Section 13.5 Zoning Objectives, Vision and Use Classes, page 472 and throughout Draft Plan where relevant**

**Amend the 'ME' Metro Economic Corridor Zoning objective to 'MRE' Metro and Rail Economic Corridor throughout the Plan.**

**PA CH 12.11: Section 13.5 Zoning Objectives, Vision and Use Classes, page 472**

**Amend the ME zoning objective as follows:**

**Facilitate opportunities for high-density mixed-use employment generating activity and commercial development and support the provision of an appropriate quantum of residential development ~~within the Metro Economic Corridor~~ adjacent to metro, rail and light rail stations.**

**PA CH 13.12: Section 13.5 Zoning Objectives, Vision and Use Classes, page 472**

**Amend the ME zoning vision as follows:**

**Provide for an area of compact, high intensity/density, employment generating activity with associated commercial and residential development which focuses on the MetroLink, rail and light rails stations within a settings of exemplary urban design, public realm streets and places, which are permeable, secure and within a high-quality green landscape. Landmark buildings will provide strong quality architectural features, which respect and enhance the character of the area into which they sit. The designated areas will form sustainable districts which possess a high degree of connectivity and accessibility and will be developed in a phased manner subject to the necessary provision of social and physical infrastructure.**

The Draft Fingal Development Plan 2023-2029 provides the following use class matrix for MRE zoned lands:

Permitted in Principle: 'ME – Metro Economic Corridor		
Betting Office	Childcare Facilities	Community Facility
Conference Centre	Cultural Facility	Dancehall/Nightclub
Education	Exhibition Centre	Funeral Home/Mortuary
Guest House	Health Centre	Health Practitioner
Home-Based Economic Activity	Hospital	Hostel
Office Ancillary to Permitted Use	Office ≤ 100sqm	Office > 100sqm and < 1,000sqm
Office ≥ 1,000sqm	Open Space	Place of Worship
Public House	Public Transport Station	Research and Development
Residential	Residential Care Home/ Retirement Home	Residential Institution
Restaurant/Café	Retail - Local < 150 sqm nfa	Retail - Convenience ≤ 500 sqm nfa
Retail - Comparison ≤ 500 sqm nfa	Retail - Supermarket ≤ 2,500 sqm nfa <sup>9</sup>	Sheltered Accommodation
Sustainable Energy Installation	Taxi Office	Telecommunications Structures
Training Centre	Traveller Accommodation	Utility Installations
Veterinary Clinic	Aparthotel	Hotel



<b>Not Permitted: 'ME – Metro Economic Corridor</b>		
<i>Abattoir</i>	<i>Aerodrome/Airfield</i>	<i>Agribusiness</i>
<i>Agricultural Buildings</i>	<i>Agricultural Farm Supplies</i>	<i>Agricultural Machinery Sales and/or Maintenance</i>
<i>Agri-Tourism</i>	<i>Air Transport Infrastructure</i>	<i>Boarding Kennels</i>
<i>Builders Provider/Yard</i>	<i>Burial Grounds</i>	<i>Car Hire Holding Area</i>
<i>Caravan Park - Holiday</i>	<i>Caravan Park - Residential</i>	<i>Cargo Yards</i>
<i>Civic Waste Facility</i>	<i>Concrete/Asphalt</i>	<i>Data Centre</i>
<i>Farm Shop</i>	<i>Fuel Depot/Fuel Storage</i>	<i>General Aviation</i>
<i>Gold Course</i>	<i>Heavy Vehicle Park</i>	<i>Industry – Extractive/Quarrying</i>
<i>Industry – General</i>	<i>Industry – High Impact</i>	<i>Logistics</i>
<i>Plant Storage</i>	<i>Retail – Comparison &gt; 500sq.m gfa</i>	<i>Retail – Superstore &gt; 2,500 sqm nfa</i>
<i>Retail – Hypermarket &gt; 5,000 sqm nfa</i>	<i>Retail – Factory Outlet Centre</i>	<i>Retail Warehouse</i>
<i>Retail – Warehouse Club</i>	<i>Road Transport Depot</i>	<i>Vehicle Sales Outlet – Small Vehicles</i>
<i>Vehicle Sales Outlet – Large Vehicles</i>	<i>Warehousing</i>	<i>Waste Disposal and Recovery Facility (Excluding High Impact)</i>
<i>Waste Disposal and Recovery Facility (High Impact)</i>		

Table 1.0 Table of Permitted in Principle and Not Permitted land uses on 'MRE' zoned lands.

As is evident from the zoning matrix detailed above, the Development Plan welcomes a variety of land uses on 'MRE' zoned lands, including residential and commercial uses. The zoning objective, and indeed the submission lands, are ideally suited to accommodating high-density, mixed-use development.

#### 4.0 Submission Request

As part of this submission, Hughes Planning and Development Consultants, on behalf of our clients, Murdock Builders Merchants (Ireland) Ltd. request that the proposed rezoning of the Kilbarrack Industrial Estate under **PA SH 10.1** is carried forward and maintained as part of the final adopted Fingal Development Plan 2023-2029. We again wish to commend Fingal County Council on this proposed inclusion and very much support the recognition development potential of these lands and their capacity to accommodate the type of consolidated and public transport led development that is sought at a National level.

We trust that the Planning Authority will be cognisant that there are a number of existing businesses operating at present within the Kilbarrack Industrial Estate, and will facilitate continued engagement with existing landowners in the preparation of the forthcoming Masterplan for the lands. Our clients look forward to having an opportunity to contribute to this masterplan exercise to ensure that the extensive redevelopment of the industrial estate is inclusive, plan-led and conducted in a cohesive manner. Our clients will also be considering alternative suitable locations within the Fingal administrative boundary to re-locate the existing Building Merchants operations to as this plan progresses.

As indicated in the preceding sections of this submission, the redevelopment of the subject lands is considered appropriate in the context of both regional and national guidance due to the recent refocus of national policy on compact and sustainable urban development, which is appropriately sited within proximity to quality public transport links. The future development of Fingal relies on strengthening the integration between high quality, high-capacity public transport routes and housing growth. It is essential that future development occurs in locations which are within or proximate to the Metropolitan area and well served by public transport links and recreational and social amenities.

The location of the submission site is ideally located to facilitate the compact and sustainable growth of the Dublin City Consolidation Area, in line with the policy direction included within the National Planning Framework, being situated in an area which benefits from existing and planned public transport, existing and improved road infrastructure, whilst also benefitting from the service infrastructure that is in place to support surrounding approved developments. The delivery of the BusConnects and DART West Programmes will also allow for a greater degree of accessibility and connectivity between the submission lands and the wider environs, making it an optimal location for high-density mixed-use development. Given the proximity of the subject lands to the Howth Junction and Donaghmede Train Station (3-minute walking distance) it is contended that the redevelopment of the subject lands for residential and mixed uses will wholly support the principles of public transport orientated development and compact growth.

## 5.0 Conclusion

Our clients welcome the opportunity to contribute to the third stage of the development plan process for drafting the Fingal Development Plan 2023-2029. The lands pertaining to this submission are zoned Objective 'GE – General Employment' in the current Fingal County Development Plan 2017-2023 and are located within the Kilbarrack Industrial Estate.

We on behalf of, Murdock Builders Merchants, fully support and welcome the proposed rezoning of the Kilbarrack Industrial Estate from 'GE – General Employment' to 'MRE – Metro and Rail Economic Corridor' (**PA SH 10.1**) and implore Fingal County Council and its members to retain this revised zoning as part of the final adopted Fingal Development Plan 2023-2029, in the interests of proper planning and sustainable development. The proposed rezoning will facilitate the comprehensive redevelopment of underutilised and prime located lands, to accommodate higher density mixed-use development.

We trust that the Planning Authority will have regard to the contents of this submission in its adoption of the Draft Fingal County Development Plan 2023-2029.



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