

Development Plan Team,  
Planning and Strategic Infrastructure Department,  
Fingal County Council,  
County Hall,  
Main Street,  
Swords,  
Co. Dublin

13<sup>th</sup> December 2022

**RE: Submission to Material Alterations of Draft Fingal County Development Plan 2023-2029**

Dear Sir / Madam,

## 1.0 Introduction

In accordance with Sections 9, 10, 11 and 12 of the Planning and Development Act, 2000 (as amended), Downey Planning, Chartered Town Planners, 29 Merrion Square, Dublin 2, on behalf of our client, Brazil (Developments) UC, Roslin, St. Margaret's, Co. Dublin wish to make this submission on the proposed Material Alterations to 'Draft Fingal County Development Plan 2023-2029 to Fingal County Council.

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., 22<sup>nd</sup> December 2022, as set out on the Draft Development Plan's website.

This written submission relates to the proposed amendment that seeks the preparation of a Local Area Plan (LAP) for Swords, under proposed Material Alteration PA SH 8.8.

## 2.0 Planning Legislation Context

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 - (7) (ad) (ii) "that written submissions or observations with respect to the proposed material alteration or an assessment referred to in paragraph (aa) and made to the planning authority within a stated period shall be taken into account by the authority before the development plan is made".*

This submission to the draft of the Development Plan is being made in accordance with Section 12 (7) (ad) (ii) of the Planning and Development Act, 2000 (as amended) and is being submitted within the specified timeframe (22<sup>nd</sup> December 2022) as set out on the website of the Fingal County Development Plan 2023-2029.

### **3.0 Grounds of Submission**

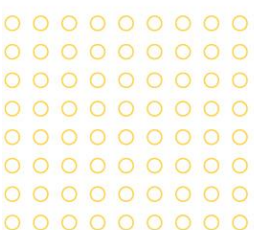
This submission, on behalf of our client, Brazil (Developments) UC, relates to the proposed Material Alteration PA SH 8.8, which outlines an indicative boundary for the Swords Local Area Plan (LAP).

As the current boundary for the LAP is shown, the boundary does not include for the Western Distributor Road or the Swords Ring Road, which are just west of the LAP boundary. In our considered opinion, these are strategic pieces of road infrastructure, which are critical to the future development of Swords and for the overall connectivity of the town and surrounding area. To leave these indicative routes outside of the LAP boundary is a fundamental shortcoming in the ability of the future LAP to plan for and deliver these key infrastructural projects.

The Swords Western Distributor Road, part of which is constructed, is to continue onto the Brackenstown Road to the south. As the Development Plan map currently indicates, the remainder of the road will be outside the boundary of the LAP. This road and also the Swords Outer Ring Road, are key pieces of infrastructure for Swords, which will ultimately connect the lands at Lissenhall with the airport area, without having to take vehicular traffic through the centre of Swords. This road, will provide significant opportunities for improved sustainable modes of transport, including walking and cycling as well as the potential of a green infrastructure route between River Valley and the Broadmeadow Estuary. It is respectfully submitted that these road infrastructures and the benefits that they may be able to bring to Swords are best placed being planned and carried out under the future Swords Local Area Plan.

In this regard, the extension of the LAP boundary further west could facilitate the following infrastructural upgrades:

- Provide for the widening of the Brackenstown Road, which may facilitate improved public transport services as well as private vehicles.
- Provide for an upgraded footpath and cycle path on the Brackenstown Road up to the junction of the Naul Road/R108.
- The provision of a major junction improvement to improve safety and queuing at the currently dangerous Brackenstown Road and Naul Road/R108 junction.
- Provision of a new green corridor between the River Valley to the south and the Broadmeadow Estuary to the north.



It is important to note that this submission does not seek to rezone any lands but is simply seeking that the boundary of the LAP is extended westwards to ensure that these indicative routes are included within the future LAP.

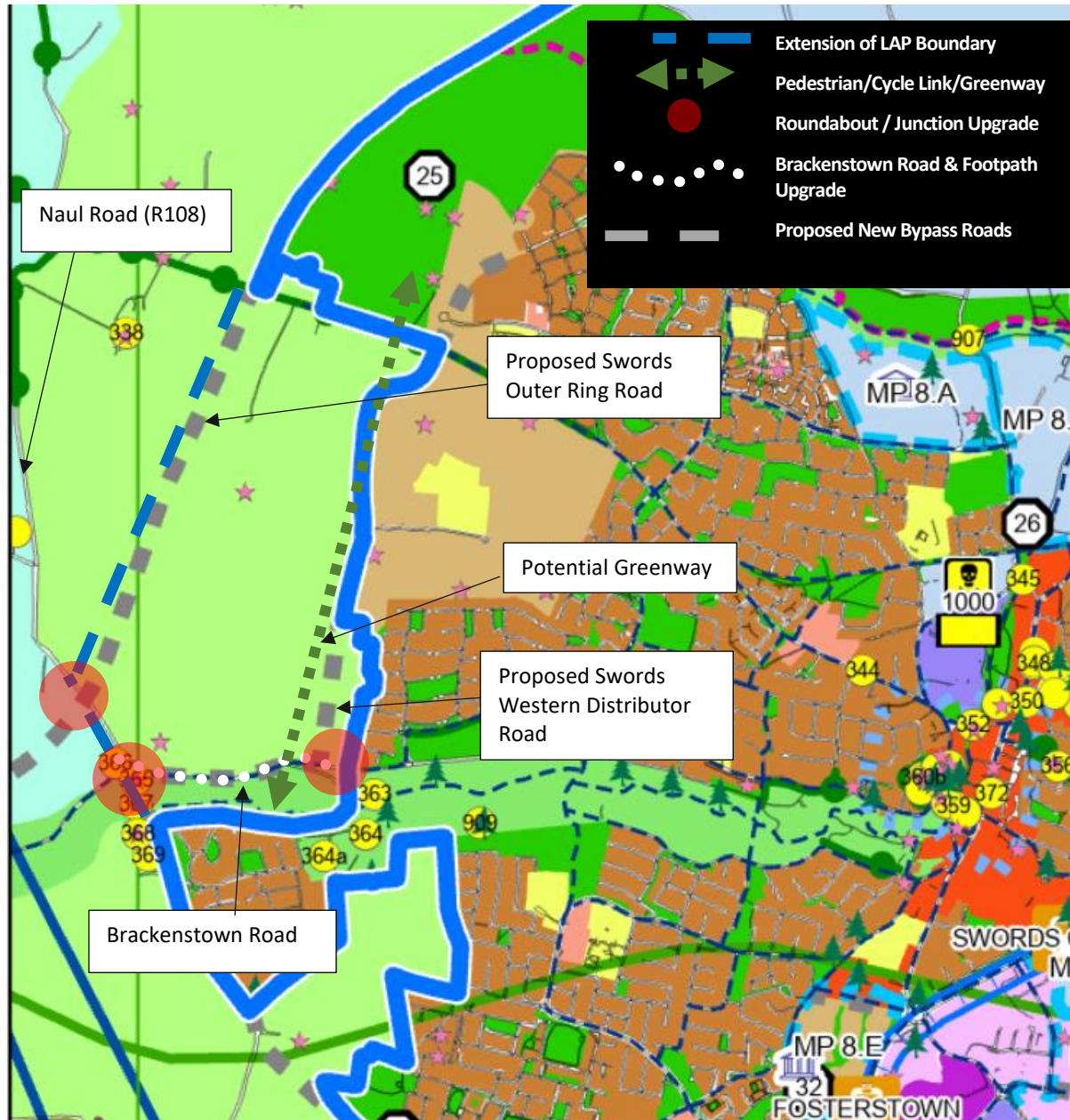


Fig. 1 – Potential Infrastructural Improvements from Extension of LAP

#### 4.0 Conclusion

This submission has been prepared by Downey Planning on behalf of our client, Brazil (Development) UC, regarding the proposed Material Alteration PA SH 8.8 to the Draft Fingal County Development Plan 2023-2029, which sets out the indicative boundary of the Swords LAP.

Downey planning are seeking that the boundary of the LAP are extended westwards to ensure that the indicative routes of the Swords Western Distributor Road and the Swords Outer Ring Road are included within the LAP, such that all the associated infrastructural benefits and improvements can be planned for within the LAP.

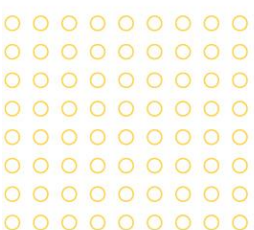
In light of the foregoing, Downey Planning, on behalf of our client, respectfully request that Fingal County Council consider the grounds of this submission to the Proposed Material Alterations to the Draft Fingal Development Plan 2023-2029 and extend the development boundary of the Swords LAP accordingly.

We would be grateful for a written acknowledgement of this submission at your convenience.

Yours sincerely,



Donal Duffy MIPI  
Director  
*For and on behalf of DOWNEY*



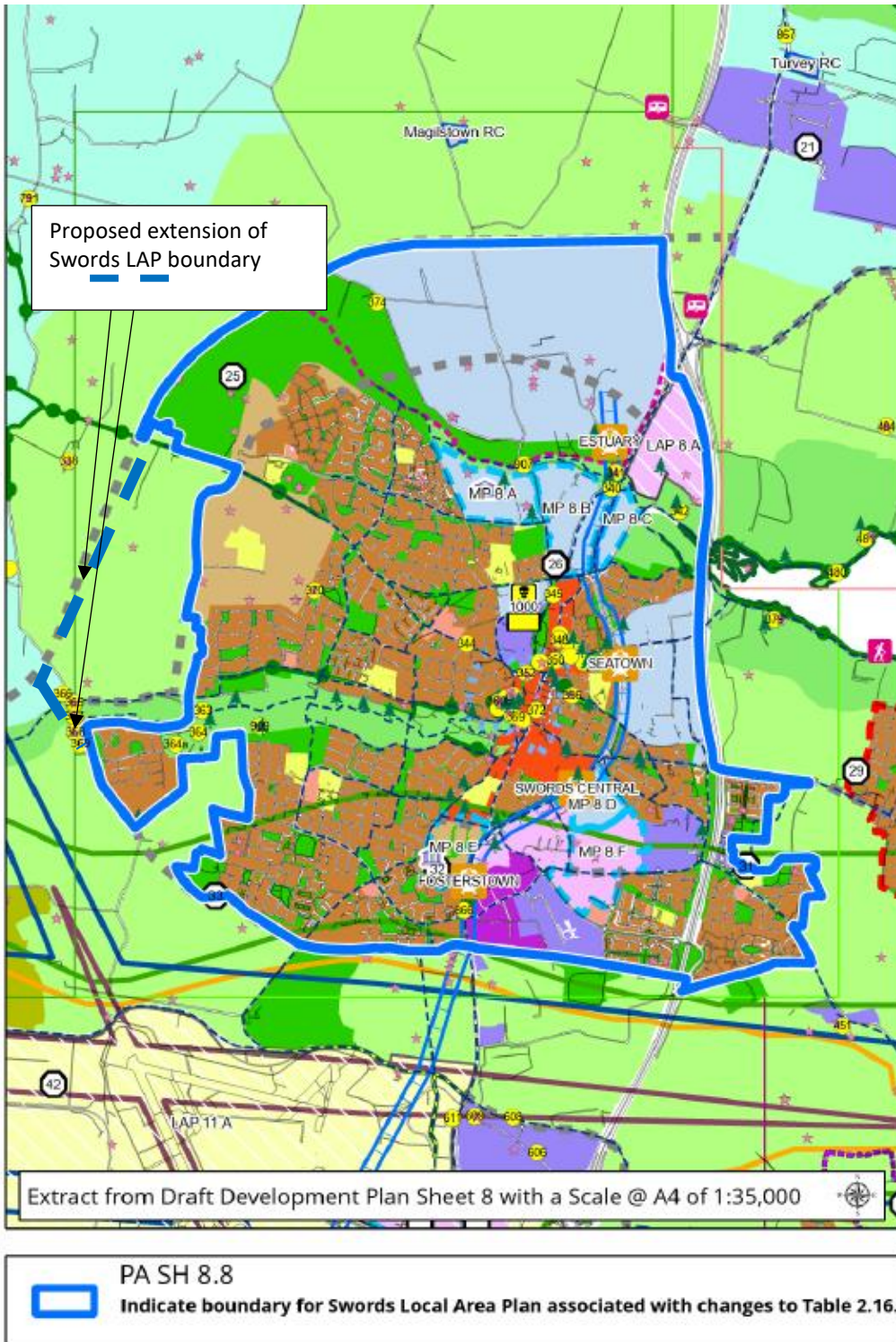


Fig. 2 – Proposed Amended Zoning Map with extended LAP Boundary