

Development Plan Team,  
Planning and Strategic Infrastructure Department,  
Fingal County Council,  
County Hall,  
Main Street,  
Swords,  
Co. Dublin,  
K67 X8Y2

20<sup>th</sup> December 2022

Dear Sir/Madam,

**RE: SUBMISSION ON THE PROPOSED MATERIAL ALTERATIONS TO THE DRAFT FINGAL COUNTY DEVELOPMENT PLAN 2023-2029 ON BEHALF OF THE NOONAN CONSTRUCTION CO. LIMITED IN RELATION TO LANDS AT BALLYGOSSAN PARK, GOLF LINKS ROAD, SKERRIES, CO. DUBLIN.**

## **1.0 INTRODUCTION**

- 1.1 On behalf of our client, The Noonan Construction Co. Limited, 13 Mellifont Avenue, Dún Laoghaire, Co. Dublin, A96 WT02, we, John Spain Associates, 39 Fitzwilliam Place, Dublin 2, D02 ND61, wish to make a submission on the Proposed Material Alterations to the Draft Fingal County Development Plan 2023-2029.
- 1.2 We refer to the publication by Fingal County Council of the Proposed Material Alterations to the Draft Fingal County Development Plan 2023-2029 which invites submissions from interested parties until the 22<sup>nd</sup> of December 2022.
- 1.3 Our client, The Noonan Construction Co. Limited, welcomes the opportunity to make a submission on the Proposed Material Alterations to the Draft Fingal County Development Plan 2023-2029.
- 1.4 Our client has recently submitted an LRD planning application for 144 no. housing units, which are sequentially located adjacent to existing development and are located some 700m from the train station (within a public transport corridor) and will complete the Ballygossan Park development in Skerries. However, it is noted an additional column included in Table 2.14, the number of units projected for the Skerries area over the Plan period which sets a housing demand in Skerries of 94 no. units. This appears to be a very considerable underestimate and is based on a reduced population project for which no explanation or rationale has been given. This submission will focus on issues relating to the Core Strategy and the distribution of housing demand to the key settlements within the County.

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1.5 This submission relates to the following Proposed Material Alterations:

- PA CH 2.4: Section 2.2 Core Strategy, page 51
- PA CH 2.5: Section 2.2 Core Strategy, page 51, 52

## 2.0 CHAPTER 2 – CORE STRATEGY

2.1 The Noonan Construction Co. Limited has concerns that the amended housing demand figures contained in the revised Core Strategy as set out in the Proposed Material Alterations are inconsistent with the objectives outlined in the National Planning Framework to provide 40% of housing units within existing settlements and promoting compact growth. In particular, there are a number of instances, as set out below, where both the housing demand figures and the housing yields are far below what are planned for certain settlements, based on recent planning application made to both Fingal County Council and An Bord Pleanála in these settlements.

2.2 In this regard, while we understand that overall housing target figures for the county are set by the Department, the Council does have a considerable degree of discretion as to how housing demand figures are distributed across different settlements within the urban hierarchy. However, of major concern to The Noonan Construction Co. Limited is that in assuming housing demand and capacity to each of the main settlements in the county, full regard has not been had in the Proposed Material Alterations to national and regional planning policies to promote compact urban growth within the existing built-up areas, with corresponding higher densities for defined central and/or accessible urban locations with proximity to high capacity/high frequency public transport services. In this regard it is noted that Skerries is located on the DART commuter line, which is planned to be upgraded to a DART service under DART+ North proposals.

2.3 Before dealing with the specifics of individual settlement housing demand figures, it should be noted that the overall housing demand figures for the County contained in the Draft Development Plan and in the Proposed Material Alterations, which are derived from the National Planning Framework population projections, are likely to significantly underestimate the actual housing demand, given that the preliminary 2022 CSO population census figures for Dublin City and counties within the Greater Dublin Area considerably exceed the NPF projections for the same period. In light of this, our client would respectfully request that Fingal County Council would include a commitment within their core strategy to undertake a review of the population and housing demand projections contained in the 2023-2029 Development Plan following the publication of the CSO census figures in Q2 2023, and to bring forward a variation to amend the core strategy to reflect the actual census figures.

### **Skerries**

2.4 In particular, we would highlight the case of Skerries Town, which is defined as a ‘*Self-Sustaining Town*’ within the Core Area of the County. Under the proposed amended Table 2.14 in the Proposed Material Alteration, the projected 2029 population for Skerries has been reduced by 732 people to 10,446 from 11,178 in the Draft Development Plan, resulting in a reduction of the projected growth of the town’s population over the life of the plan by more than half. No evidence base or justification has been provided in the proposed Material Alteration as to why the population growth projected for the town has been so radically reduced.

Core Strategy Areas	Settlement Type	Name	CSO Census Population on 2016	Estimated 2023 Population	Estimated 2029 Growth	Estimated 2029 Population	Projected Housing Demand (Units)	Total Available Zoned Residential Land	Total Units / Potential Yields	Lands - With Permission (Extant) - Units	
Metropolitan Area	(1) Dublin City and Suburbs Consolidation Area	Blanchardstown - Mulhuddart LEA, includes The Ward, Dubber, Tyrellstown, Mulhuddart, Corduff & Abbottstown	34,420	39,583	3,258	42,841	1,761	90	4,495	917	
		Ongar LEA - includes Blakestown, Coolmine	50,214	57,746	1,803	59,549	975	33	1,659	785	
		Castleknock LEA, includes Roselawn, Delwood, Castleknock Park, Knockmaroon & Lucan North	32,633	37,528	3,005	40,533	1,625	52	2,623	509	
		Santry and Ballymun	2,485	2,684	925	3,609	500	12	600	358	
		Belcamp and Balgriffin	6,702	7,238	912	8,150	493	36	1,791	-	
		Baldoyle / Sutton	13,402	14,474	925	15,399	500	34	1,709	1,386	
		Howth	8,294	8,875	925	9,800	500	20	1,006	710	
	(2) Key Town	Swords	47,120	54,188	6,077	60,265	3,285	122	6,110	2,468	
	(3) Self Sustaining Growth Town	Donabate	7,443	8,187	3,039	11,226	3	112	3,912	532	
	(4) Self Sustaining Towns	Malahide	17,053	17,906	1,623	19,528	877	46	1,610	109	
		Portmarnock	9,549	10,408	1,060	11,468	573	32	1,120	230	
		Baskin	349	366	19	386	10	2	24	46	
	(5) Towns and Villages	Coolquay	349	366	37	404	20	37	93	-	
		Kinsealy	405	425	268	693	145	11	220	41	
		Portrane	1,236	1,298	196	1,494	106	11	106	-	
		Rivermeade	720	756	172	928	93	17	174	-	
		Rowlestown	896	941	185	1,126	100	48	480	9	
	Core Area	(4) Self Sustaining Towns	Balbriggan	22,084	23,851	3,519	27,370	1,902	103	3,603	93
			Rush	10,359	10,877	925	11,802	500	53	1,600	338
			Lusk	8,353	8,771	555	9,326	300	27	818	132
Skerries			9,783	10,272	174	10,446	94	9	273	7	
(5) Towns and Villages		Ballyboghil	681	708	163	871	88	21	206	-	
		Ballymadun	424	441	19	459	10	16	41	-	
		Balrothery	1,943	2,021	87	2,107	47	11	164	43	

Figure 1: Core Strategy as set out in the Proposed Material Alterations to the Draft Plan

2.5 Likewise, when it comes to the figures for available residentially zoned land and the resultant housing yields for Skerries, these have also been significantly reduced, again with no apparent explanation. Thus, in the Proposed Material Alteration in Table 2.14, the total available residentially zoned land in Skerries has been reduced from 15 ha. to

9 ha. with the corresponding potential yield reduced from 373 to 273 units. Our client has no issue with the Total Available Zoned Residential Lands of 9 ha, the issue is regarding the density proposed for these lands (c. 30 uph) and the projected housing demand estimated for Skerries in the Proposed Material Alterations.

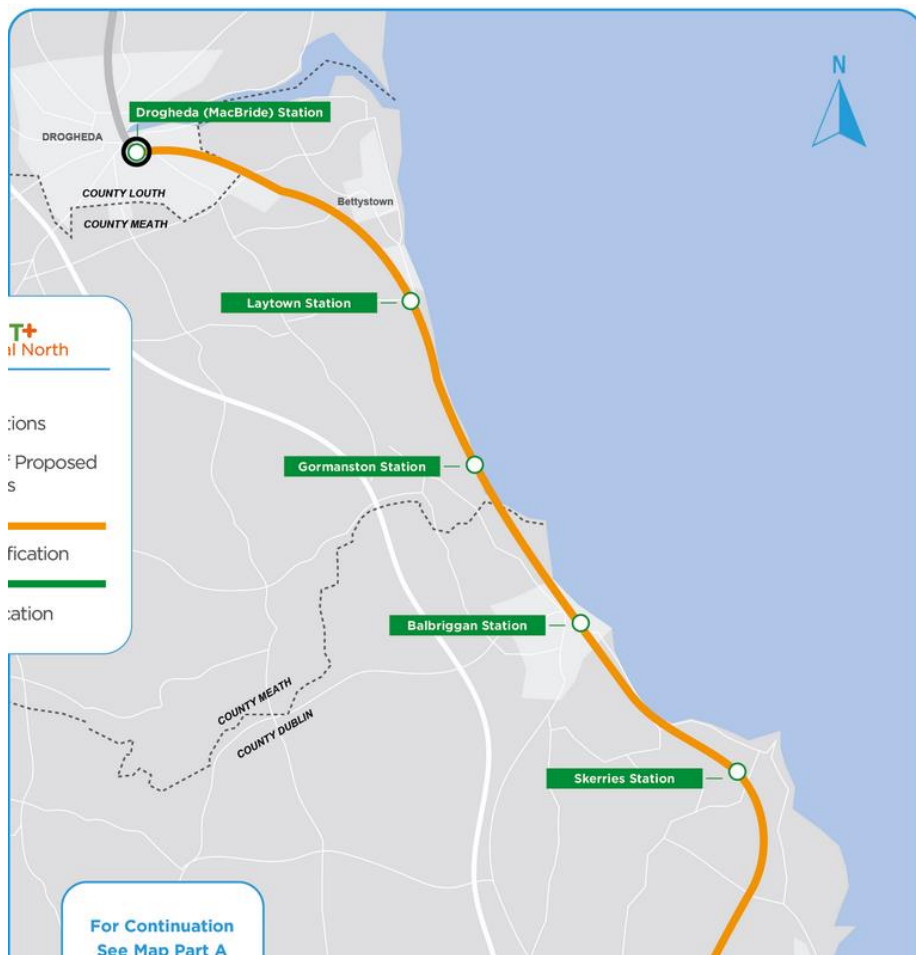
- 2.6 The amended Table 2.14 has also introduced a new column headed 'Projected Housing Demand' and for Skerries has allocated a total of 94 no. units over the six-year period of the Plan.
- 2.7 Such a low housing demand figure is totally unrealistic and is not reflective of what is happening on the ground in Skerries. As the Council will be aware, The Noonan Construction Co. Limited has a current LRD application lodged with FCC for 144 no. housing units on a site of 5.05 ha which also includes necessary advanced infrastructure works (LRD0010/S3). FCC stated that the *"documentation submitted constitute a reasonable basis on which to make an application for permission for the proposed LRD"* in their Opinion. The lands are zoned for residential and open space use.



**Figure 2: Subject site approximately outlined in red (Source: Google Maps)**

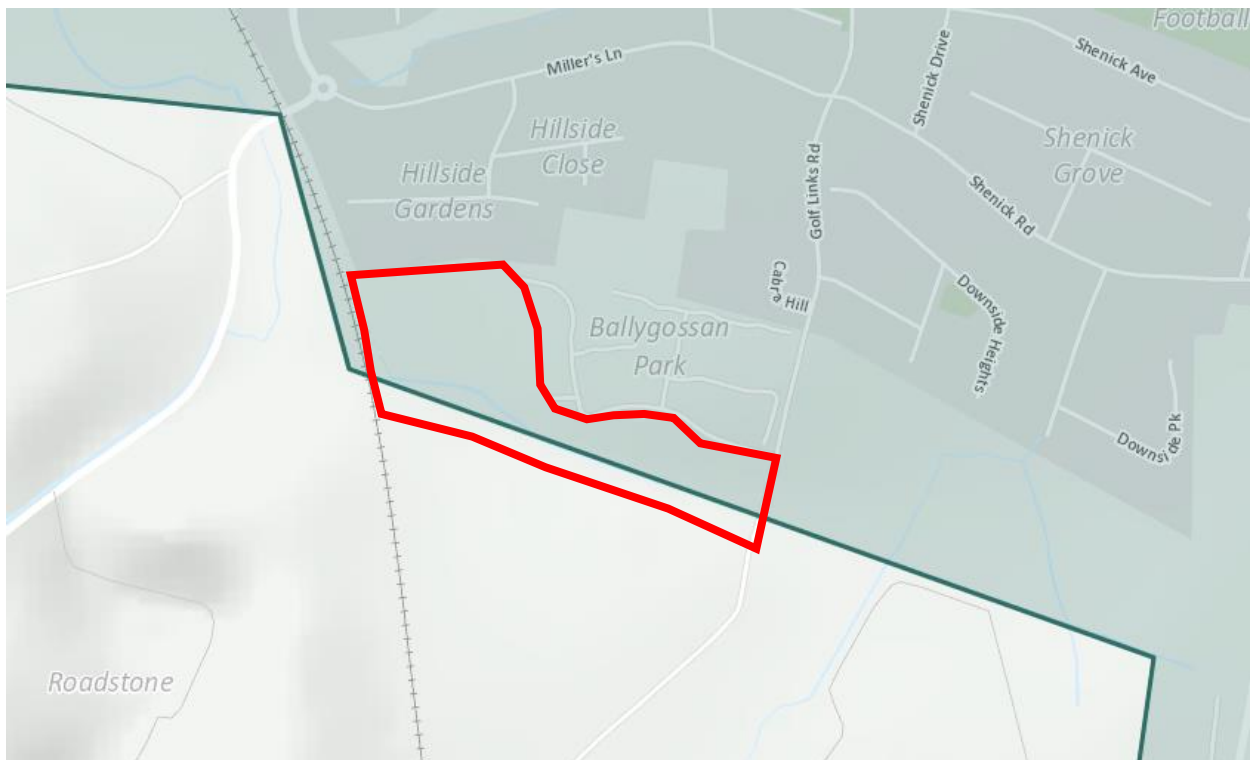
- 2.8 In addition, there is a current SHD application before An Bord Pleanála (Ref.: ABP-313268-22) for a 345 no. unit scheme on a site at Hacketstown with a site area of 6.6 ha., located to the immediate south of Ballygossan Park. Again, this scheme, which is also located within the Hacketstown LAP lands, is supported in the FCC's Opinion submitted to the Board. The Ballygossan Park development was also supported by The Board in their Opinion following previous SHD Pre-Application Consultation (Ref.: ABP-308583-20). Given that both sites are located within close proximity to the Skerries railway station, (within a public transport corridor) they have both been designed with an overall net residential density of 52 uph, reflecting national planning policy (in the Sustainable Residential Guidelines 2009) for lands located within major public transport corridors.
- 2.9 Based on this recent and current planning history, it is inappropriate that in the proposed amended Table 2.14 in the Proposed Material Alteration, that a figure of only 94 units is projected to be demanded in Skerries for the period 2023-2029.

- 2.10 The projected yield from the 9 ha. available residentially zoned land would be only 273 units, which equates to a density of 30uph, and is not consistent with national policy as set out in the National Planning Framework and Section 28 Planning Guidelines.
- 2.11 The '*Sustainable Residential Developments in Urban Areas – Guidelines for Planning Authorities*' states that *"it is recommended that increased densities should be promoted within 500 metres walking distance of a bus stop, or within 1km of a light rail stop or a rail station. The capacity of public transport (e.g. the number of train services during peak hours) should also be taken into consideration in considering appropriate densities. In general, minimum net densities of 50 dwellings per hectare, subject to appropriate design and amenity standards, should be applied within public transport corridors, with the highest densities being located at rail stations / bus stops, and decreasing with distance away from such nodes."*
- 2.12 Similarly, the Apartment Guidelines 2020 state that lands located in Intermediate Urban Location (1,000m – 1,500m from DART and commuter rail), should broadly be greater than 45 units per hectare.
- 2.13 The lands situated at Ballygossan Park are located within 1km (within 700m-850m south) of the Skerries railway station along a public transport corridor and therefore require a minimum net density of 50 units per hectare. The density standards applied in the Proposed Material Alterations are therefore not considered to align with national policy guidance and should be updated to reflect such policy.
- 2.14 No other 'Self Sustaining' Towns in either the Metropolitan or Core Areas of the County have been allocated such a low housing demand, as is proposed for Skerries. For example, Rush has a projected housing demand figure of 500 units, while Lusk has an equivalent figure of 300 units. This is despite the fact that Skerries is a well-established town, with an excellent range of local amenities, services and facilities, and which is higher on the retail hierarchy than either Rush or Lusk and is the only one of these towns located on the DART commuter line, which is planned to be upgraded to a DART service under DART+ North proposals. Accordingly, the very low projected housing demand stated for Skerries is contrary to both National and Regional planning policy, and indeed is inconsistent with Fingal's core strategy itself.



**Figure 3: DART+ North Proposed Route**

- 2.15 Accordingly, we would respectfully request that the housing demand figure for Skerries contained in the revised Table 2.14 would be amended to be a minimum of 500 housing units, to reflect the status of Skerries as a town, its access to high capacity/high frequency public transport services, the recent planning history of the available undeveloped residentially zoned land, which are both highly accessible and located within the built-up area of the town within the defined development boundary.



**Figure 4: Existing Built-Up Area of Skerries with approximate site boundary outlined in red (Source: CSO)**

- 2.16 It is considered that available residential zoned lands within Self-Sustaining Towns such as Skerries should not be restricted from providing housing units, particularly at a location in close proximity to the Skerries railway station which currently provides links to both Dublin City and Belfast, and will benefit from the DART+ North scheme which will provide for increased accessibility from Skerries into Dublin City.
- 2.17 It is respectfully submitted that the proposed additional text below (Para 2.24 & 2.25) will afford the required flexibility to ensure that the overall housing targets for the County are met as some sites will come forward quicker than others while other sites may not be developed within the lifetime of the new Plan.
- 2.18 It is important that the adopted plan accounts for the actual or likely periods of time for translation of lands zoned for residential use, the grant of planning permission through to the eventual completion of the development of units available for residential use.
- 2.19 Perhaps the most critical incorrect assumption made is that all or most zoned land will be developed within the lifetime of any particular Development Plan. It is clear that this scenario has never been realised in any Development Plan. We understand for example that the construction of dwellings of zoned land within any Development Plan period is substantially less than envisaged and a fraction of what identified in core strategies.
- 2.20 For example, even where development has been identified in Strategic Development Zones as being of national importance, the development of these strategic sites takes longer than a single development plan cycle to deliver dwellings. In 21 years, it has been estimated that Ireland's 11 No. SDZs, whilst permitting for c. 45,000 No. units, combined have 'delivered' in the order of 6,000 No. units (13%) - including a significant number under construction, but not yet occupied.

2.21 We would note<sup>1</sup> that the low levels of zoned land which is activated in a 6 year development plan period is estimated at just a sixth, which is highlighted in the following text from the Minister of Housing, where commenting on the upcoming deadline of 1 January 2023 for making submissions to local authorities (on the RZLT), Minister O'Brien said:

*"It's estimated that **only one-sixth** of residential zoned land is activated for housing during a local authority's six-year Development Plan. We need to increase housing supply and to do this we need to ensure that land which has benefited from appropriate zoning and servicing and has gained planning permission is developed quickly in all counties and settlements in the State. We also need to encourage owners of zoned and serviced land which does not have planning permission to actively engage with planning authorities with a view to applying for permission."* (emphasis added).

2.22 Yet, housing delivery targets currently assume that 75%-100% of all zoned land will be delivered over the 6-year Development Plan period. Given that the 75%-100% figure which is used to inform housing targets, the inevitable shortfall in land coming forward for development will mean that the housing delivery targets set out in new Development Plans will not be met and Government projections for housebuilding in the current housing crisis and beyond will be flawed and certain to fail. As a result, the opportunity to deliver housing will be reduced and supply will fall significantly short of meeting demand and the targets set out in the Development Plan.

#### **RECOMMENDED MODIFICATIONS TO THE PROPOSED MATERIAL ALTERATION PA CH 2.4**

2.23 Skerries is identified as a Self-Sustaining Town in the Draft Fingal County Development Plan 2023-2029 with good public transport connections such as the Skerries railway station which is located in close proximity to our client's lands. Table 2.14 identifies Skerries as having a housing units demand of 94 no. units on 9 hectares of land. It is considered that this provision is contrary to national and regional planning policy guidance which promotes compact growth within existing build up areas.

2.24 Accordingly, on behalf of our client, we would respectfully request that:

- The housing demand figures for Skerries are increased to a minimum of 500 housing units.
- The housing yield figures for Skerries are increased to reflect national and local policy on sustainable densities for lands located within a public transportation corridor, which promote densities of at least 50 units per hectare and a potential yield of 500 units.
- The population figure for Skerries is increased to reflect the required densities and housing yield with consequent alteration to table 2.4 as follows:

Skerries	CSO Census Population 2016	Estimated 2023 Population	Estimated 2029 Growth	Estimated 2029 Population	Projected Housing Demand (units)	Total Available Zoned Residential Land	Total Units /Potential Yield	Lands with Permission (Extant Units)
	9,783	10,272	925	11,197	500	9 ha	500	7

<sup>1</sup> [gov.ie - Landowners reminded of 1 January deadline for submissions on Residential Zoned Land Tax Draft Maps \(www.gov.ie\)](http://www.gov.ie)



## RECOMMENDED MODIFICATIONS TO THE PROPOSED MATERIAL ALTERATION PA CH 2.5

- 2.25 We would also recommend the following alteration is made to Proposed Material Alteration no. PA CH 2.5. Suggested additional wording is highlighted in green:

*“Table 2.14 shows where the Projected Housing Demand will be concentrated. It also shows the extent of undeveloped lands in each settlement. The Council will monitor the delivery of housing units to ensure general compliance with the Core Strategy and housing supply targets for the County and to inform the redistribution potential, between settlements at the same level in Table 2.14, if required, as per Objective CSXX. This allows for the Council to consider the redistribution of housing population figures where the applicant must demonstrate to the Planning Authority that the proposal is aligned with the overall growth target for the County. The Core Strategy figures for each settlement serve as a benchmark for monitoring to ensure compliance with National and Regional figures and the relevant guidelines.”*

- 2.26 We also suggest the following alteration to the wording of the below objective:

*“Objective CSOXX – Delivery of Housing Units*

*Provide for flexibility in achieving the housing supply targets and meeting housing demand, the Council will consider the re-distribution of housing and population figures between settlements at the same level in Table 2.14, for sites within public transport corridors, within each settlement. In this regard, where a site greater than 0.25ha has the potential to exceed the allocation for a particular settlement as set out under Table 2.14, the applicant must demonstrate to the Planning Authority that the necessary social and physical infrastructure is in place or can be provided as part of the application to accommodate the proposed development.*

*The Council will monitor the delivery of housing units to ensure general compliance with the Core Strategy and housing supply targets for the County and to inform the redistribution potential outlined above.”*

### 3.0 CONCLUSIONS

- 3.1 The Noonan Construction Co. Limited welcomes the publication of the Proposed Material Alterations to the Draft Fingal County Development Plan 2023-2029. In particular, our client would like to make a submission regarding Table 2.14 within the Proposed Material Alterations. The figures contained in this table significantly under-estimates the true housing demand for a number of urban centres. In particular, the proposed housing demand figure for Skerries, as contained in the Proposed Material Alterations, does not reflect existing planning commitments, and if left unchanged, would pose a serious constraint on our client’s ability to deliver critical housing units and the completion of the second phase of housing development at Ballygossan which is located on an infill site within walking distance of a train station in this key settlement.
- 3.2 We would be grateful if this submission can be taken into consideration before the final adoption of the new Fingal County Development Plan 2023-2029.

Yours faithfully,



**John Spain Associates**

