

Submission on
the Material
Amendments
to the Fingal
Draft County
Development
Plan 2023 –
2029

Lands at Portmarnock
South, Co. Dublin

For Portmarnock Real
Estate Developments

DECEMBER 2022

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1 INTRODUCTION

This submission is made by Stephen Little & Associates, Chartered Town Planners & Development Consultants, 26 / 27 Upper Pembroke Street, Dublin 2 D02 X361, on behalf of Portmarnock Real Estate Developments Limited, with an address at Fitzwilliam Court, Leeson Close, Dublin 2. For clarity, Portmarnock Real Estate Developments Limited are the owner of the Portmarnock South lands and Quintain Developments Ireland Limited have been engaged to act as the development manager on behalf of Portmarnock Real Estate Developments Limited. Quintain Developments Ireland Limited have full authority to act on behalf of Portmarnock Real Estate Developments Limited with respect to the Portmarnock South Lands.

This submission is being made in response to the publication of the Proposed Material Amendments to Draft Fingal County Development Plan 2023 – 2029 (“the Draft Plan”) currently on public display until the 22 December 2022.

We confirm that we have carefully considered the content of the Proposed Material Amendments prior to preparing this formal submission.

1.1 Basis of this Submission

This submission is being made in the context of Proposed Material Amendments to the Draft Plan which relate to the Portmarnock South Local Area Plan, 2013, As Extended, (“the LAP”) namely: -

PA CH 2.9: Section 2.4.1 Local Area Plans, page 55

Include additional text directly before the heading “Operational LAPs” on page 55 of the Draft Development Plan as follows:

Fingal County Council will seek to ensure that the mitigation measures as set out in all statutory Local Area Plans in Fingal will continue to be implemented and managed in accordance with the requirements of the LAPs.

PA CH 2.11: Section 2.4.1 Local Area Plans, page 56 Amend Section 2.4.1 as follows: -

~~Fingal County Council will prepare these plans over the lifetime of the Development Plan, subject to resources.~~

Following adoption of the Development Plan, a list of LAPs and other strategic plans to be prepared over the lifetime of the Development Plan will be drafted by the Planning Department based on the Council’s priorities and subject to resources.

PA CH 2.27 Self-Sustaining Towns Objectives, page 84

Include a new objective in Chapter 2, after CSO60 as follows: -

Mitigation Measures - Ensure that the mitigation measures as set out in the Portmarnock South and Baldoyle Stapolin LAPs will continue to be implemented and managed in accordance with the requirements of the LAPs.

PA SEA 1: Self-Sustaining Towns Objectives, page 84

Include a new objective in Chapter 2, after CSO60 as follows: -

Mitigation Measures – Ensure that the mitigation measures as set out in the Portmarnock South and Baldoyle Stapolin LAPs will continue to be implemented and managed in accordance with the requirements of the LAPs.

PA AA 1: Self-Sustaining Towns Objectives, page 84

Include a new objective in Chapter 2, after CSO60 as follows: -

Mitigation Measures - Ensure that the mitigation measures as set out in the Portmarnock South and Baldoye Stapolin LAPs will continue to be implemented and managed in accordance with the requirements of the LAPs.

MAP SHEET 9

PA SH 9.1

Amend the boundary line between the RA-Residential Area and OS-Open Space zoning objectives at the Portmarnock South lands.

Quintain Developments Ireland Ltd. (“Quintain”) are seeking clarity on the status of the current LAP, given that it is due to expire in July 2023. Quintain note that the list of Local Area Plans to be prepared during the lifetime of the County Development Plan will be drafted after adoption of the Plan. Quintain note therefore that it may be that the LAP will expire and will not be replaced, bearing in mind that the majority of the objectives of the LAP have already been achieved (as is set out below for convenience). This would allow the remaining development at Portmarnock South to occur in accordance with the ‘RA’ – Residential Area land use zoning objective and otherwise consistent with the provisions of the new County Development Plan, albeit subject to the mitigation measures contained in the present LAP continuing to be implemented in any future planning applications.

It is submitted that there may be some confusion however if Map Based Objective LAP.9A on Map Sheet 9 is retained on the Land Use Zoning Map as this could be interpreted as meaning a new LAP is required. The lands in question are shown hatched in white lines on the Map Sheet 9, which is explained in the Legend to that Map as being a Specific Objective “*Subject to Local Area Plan*”. This risk of confusion may be resolved by the omission of the hatched area and Legend from the Map in the interests of clarity (See Section 6 for further discussion).

In that regard, we would note that the existing LAP is in force and the omission of the Specific Objective from Map Sheet 9 would not have any effect on that current LAP; being a separate statutory plan with its own statutory timeframe.

Wholly without prejudice to the above, should in fact it be the Council’s intention to prepare a new Local Area Plan for Portmarnock South in the lifetime of the current Development Plan, which we submit is not necessary for the reasons set out below, then Quintain respectfully submit that priority should be given to the Portmarnock South lands (See Section 7 for further discussion) and a commitment to commencing that LAP within 3 months of the adoption of the new County Development Plan be included as an objective of the County Development Plan 2023 – 2029.

We discuss these possible scenarios further in our submission below.

We request that Fingal County Council has due regard to the contents of this submission when preparing and adopting the Fingal County Development Plan 2023 – 2029.

2 EXECUTIVE SUMMARY

For the reasons set out below, Quintain submit that Specific Objective “Subject to a Local Area Plan” denoted by a white hatch across the lands at Portmarnock South (being lands controlled by our clients) be omitted from Map Sheet 9 to avoid confusion and in the interests of legal clarity.

Quintain has received legal advice to the effect that the way in which the Development Plan includes a Specific Objective on the lands “*Subject to Local Area Plan*” they are exposed to challenges by way of Judicial Review in the event they were to secure a grant of planning permission in the absence of a valid Local Area Plan.

In the alternative, if that is retained, that the following be added beneath the proposed Material Amendment under Objective CSO60: “*Mitigation Measures – Once the Portmarnock South LAP, as extended (provided for under “Objective LAP.9A”), withers that permission for any further development on these lands will be guided by the provisions of the County Development Plan as well as the mitigation measures of the former LAP, no new LAP will be necessary*”. Lastly, if the LAP is to be replaced (and Quintain submit for the reasons set out below that its replacement is not necessary) then its replacement should be prioritised so as to ensure that residential development on the relevant lands is not delayed.

2.1 Omission Map Based Specific Objective for A Local Area Plan

Since acquiring the Portmarnock South lands in 2017 Quintain have sequentially been developing same in accordance with the framework set out in the LAP (See Appendix A for an overview of the key structuring elements of the LAP).

The following provides an overview of the relevant planning history to date on the Portmarnock lands (See Appendix B for a detailed overview): -

- **Phase 1A** – 101no. units (Permission granted July 2014 – constructed and occupied).
- **Phase 1B** – 150no. units (Permission granted March 2018 – constructed and occupied).
- **Phase 1C** – 153no. units (Permission granted January 2020 – under construction – expected completion January 2023).
- **Phase 1D** – 172no. units (Permission granted May 2022 – subject to Judicial Review).
- **Phase 1E** – 192no. units (Large-scale Residential Development (LRD) planning application to be submitted Q1 2023).

Arising from the above, the following are the main structuring elements of LAP which have or will be implemented: -

- Integration of the Recorded Monuments (RMP-DUO 15:014 and RMP-DUO 15:015).
- Integration of the Townland Boundaries.
- Provision of Skylark Park.
- Implementation of the Ecological Buffer including Murragh Spit and Bird Quiet Zone (c. 107 Ha – Transferred to Fingal County Council in June 2018).
- Regional SuDs infrastructure.
- Local Centre.
- Primary Route including access onto Station Road and link toward Moyne Road, including the inter-monumental route.
- Secondary Route.

- Series of interconnected pedestrian / cycle links towards Portmarnock Train Station including along Station Road connecting back to Greenway.

The Council will be well aware to the planning policy context and planning history pertaining to the Portmarnock lands. Notwithstanding, we have provided evidence of this important context in support of this submission in Appendix A – Site Description & Planning Policy Context and Appendix B – Planning History Overview.



Figure 1: Drone Image showing the extent of development within the Portmarnock landbank by Quintain to date.

Quintain are of the firm opinion that the LAP does not need to be renewed on the basis that (See Section 6 for further discussion): -

- The remaining development not yet progressed through the planning process (c. 290no. units) can occur in accordance with the 'RA' – Residential Area land use zoning objective and the provisions of the Development Plan otherwise.
- The remaining development (c. 290no. units) is significantly below the requirements for the preparation of a Local Area Plan as set out in the Planning & Development Act 2000, as amended (i.e. 5,000no. units).
- The key structuring elements of the current LAP have been implemented (Phase 1A & 1B – completed and Phase 1C – expected completion in January 2023) or will be implemented (permitted Phase 1D and future LRD planning application for Phase 1E).
- Quintain fully support the inclusion of an objective to implementation of the mitigation measures as set out in the LAP which form part of the Material Amendments.
- With the key structuring elements of the LAP implemented, all that will ultimately remain is parcels of land to accommodate the remaining parcels of residential development.

Furthermore, Quintain has received legal advice to the effect that the way in which the Development Plan includes a Specific Objective on the lands “*Subject to Local Area Plan*” they are exposed to challenges by way of Judicial Review in the event they were to secure a grant of planning permission in the absence of a valid Local Area Plan.

The following Minor Modifications are being sought through this submission: -

2.1.1 Requested Minor Modification No. 1

In the event the Council do not intend to prepare a new Local Area Plan for Portmarnock South in the lifetime of the County Development Plan 2023 – 2029, but rather are satisfied that the remaining provisions of County Development Plan could apply to any new development proposals the following modification is requested in the interests of certainty and clarity: -

MAP SHEET 9

In the interests of clarity as it is not the Council’s intention to prepare a new Local Area Plan for Portmarnock South, that the Specific Objective “Subject to a Local Area Plan” denoted by a white hatch across the lands be omitted from Map Sheet 9.

2.1.2 Requested Minor Modification No. 2

If on the other hand it is the Council’s intention to let the existing LAP wither but the *Map Based Objective LAP.9A* is to be retained we would suggest the following Objective be added beneath the proposed Material Amendment under Objective CSO60 so as to read as follows: -

PA CH 2.27 Self-Sustaining Towns Objectives, page 84

PA SEA 1: Self-Sustaining Towns Objectives, page 84

PA AA 1: Self-Sustaining Towns Objectives, page 84

Mitigation Measures – Ensure that the mitigation measures as set out in the Portmarnock South and Baldoyle Stapolin LAPs will continue to be implemented and managed in accordance with the requirements of the LAPs.

Mitigation Measures – Once the Portmarnock South LAP, as extended (provided for under “Objective LAP.9A”), withers that permission for any further development on these lands will be guided by the provisions of the County Development Plan as well as the mitigation measures of the former LAP (no new LAP will be necessary).

2.2 Prioritisation of New Portmarnock South Local Area Plan

Should the Council consider that the Map Based Specific Objective “Subject to a Local Area Plan” – LAP.9A on Map Sheet 9 of the Draft County Development Plan should be retained, Quintain maintain that the new Local Area Plan for Portmarnock should be prioritised on the basis that: -

- The Portmarnock lands have direct access to wastewater and water supply and can be considered Tier 1: Serviced Zoned Lands having regard for the provision of the NPF. The Draft County Development Plan 2023 – 2029 confirms this to be the case also.
- Surface water infrastructure implemented in Phase 1B has been designed to cater for all of the development in the LAP.
- The Portmarnock lands benefit from a range of high quality public transport including commuter rail, DART and bus. Further improvements will be made to the bus services under BusConnects.

- Portmarnock South lands are not within a floodzone.
- This future Racecourse Park is within walking distance of the Portmarnock lands connected by both existing and permitted infrastructure. This is a significant amenity on the doorstep of prospective residents of residential development in Portmarnock.

2.2.1 Requested Minor Modification No. 3

Where the Council in fact do intend to prepare a new Local Area Plan for Portmarnock South in the lifetime of the County Development Plan 2023 – 2029, the following modification is requested: -

PA CH 2.9: Section 2.4.1 Local Area Plans, page 55

Include additional text directly before the heading “Operational LAPs” on page 55 of the Draft Development Plan as follows:

The preparation of a new Local Area Plan for Portmarnock South shall be commenced within 6 months of the adoption of the County Development Plan 2023 – 2029 and in the interim, pending adoption of a new Local Area Plan development may continue to be permitted subject to complying with the mitigation measures contained in the Portmarnock South Local Area Plan 2013 – 2019, as extended.

The arguments, considerations and rationale for the above positions are set out in more detail below.

3 CLIENT

Quintain Developments Ireland Ltd. (“Quintain”) has already established an excellent track record of delivering housing units and is developing in a number of locations across the Greater Dublin Area.

At Portmarnock South, permissions have been obtained for 404no. units, Local Centre, a public park and surface and foul water infrastructure to serve proposed and future development, and the final few units of the 404no. units which have permission are due to be completed in January 2023. A further 172no. units are already permitted (Phase 1D) as part of the next phase of development. Quintain have also completed the necessary Large-Scale Residential Development consultations in respect of a further phase (Phase 1E) comprising a further 192no. dwelling units and expect to make a planning application for that development shortly. In total, Quintain are aiming to develop 1,050 – 1,100no. residential units in Portmarnock South, with 768no. of these either existing, under construction, already permitted or in the planning system, with only approximately 290no. dwellings remaining to be progressed beyond Masterplan stage.

In the context of the Portmarnock South lands, Quintain are in control of all the required lands to enable the completion of the remaining elements of development at Portmarnock South. Furthermore, they have access to funding to complete the entire development of the Portmarnock South landbank and their business plan envisages that the remaining units could be completed by 2026, subject to receipt of implementable permissions.

4 DEVELOPMENT FRAMEWORK

Quintain has engaged extensively with the Fingal County Council Planning Department since 2017 in a process whereby the requirements of the LAP were tested in order to arrive at a Development Framework for the entire lands controlled by the Quintain.

We would highlight that the LAP governing the development of these lands does not require the preparation of a Development Framework, or masterplan of any kind. Quintain and the Planning Authority agreed mutually that it would assist all parties understanding of any new development and how that might relate to the intended future development on the lands.

The Development Framework, prepared by Burke Kennedy Doyle Architects (retained Project Architects) has accompanied each of the planning applications submitted to Fingal County Council / An Bord Pleanála (See Section 5 / Appendix B).



Figure 2: Extract from the Development Framework, prepared by Burke Kennedy Doyle Architects which has been used to demonstrate Quintain’s vision of how the Portmarnock landbank would ultimately be developed.

The sequential development of the Portmarnock lands by Quintain is entirely consistent with the approach to these lands set out on the LAP. The Development Framework provides for some c. 1,050 – 1,100no. units overall across the entire zoned lands at Portmarnock South. The density of development being provided across those lands as a whole amounts to between 35 – 42no. dwellings per Ha which aligns with the aviation safety requirements of the LAP.

5 PLANNING HISTORY – IMPLEMENTATION OF THE LAP FRAMEWORK

Since acquiring the Portmarnock lands in 2017 Quintain have sequentially been developing same in accordance with the framework set out in the LAP (See Appendix A for an overview of the key structuring elements of the LAP).

The following provides an overview of the relevant planning history to date on the Portmarnock lands (See Appendix B for a detailed overview): -

- **Phase 1A** – 101no. units (Permission granted July 2014 – constructed and occupied).
- **Phase 1B** – 150no. units (Permission granted March 2018 – constructed and occupied).
- **Phase 1C** – 153no. units (Permission granted January 2020 – under construction – expected completion January 2023).
- **Phase 1D** – 172no. units (Permission granted May 2022 – subject to Judicial Review).
- **Phase 1E** – 192no. units (LRD planning application to be submitted Q1 2023).



Figure 3: Extract from the Development Framework, prepared by Burke Kennedy Doyle Architects showing the various phases of development at Portmarnock (constructed – Phase 1A & 1B, under construction – Phase 1C, permitted – Phase 1D and subject to planning permission – Phase 1E. The future development lands lie north of Phase 1E.

Arising from the above, the following are the main structuring elements of LAP have or will be implemented: -

- Integration of the Recorded Monuments (RMP-DUO 15:014 and RMP-DUO 15:015).
- Integration of the Townland Boundaries.
- Provision of Skylark Park.
- Implementation of the Ecological Buffer including Murragh Spit and Bird Quiet Zone (c. 107 Ha – Transferred to Fingal County Council in June 2018).
- Regional SuDs infrastructure.
- Local Centre.
- Primary Route including access onto Station Road and link toward Moyne Road, including the inter-monumental route.
- Secondary Route.
- Series of interconnected pedestrian / cycle links towards Portmarnock Train Station including along Station Road connecting back to Greenway.

From the planning history set out above (See Appendix B for further detail), it can be seen clearly that in the short period of time since acquiring the lands Quintain have been actively pursuing a phased approach to the delivery of new homes at Portmarnock South in line with the provisions of the LAP. In doing so, the vast majority of the key structuring elements of the LAP have been implemented (Phase 1A & 1B – completed and Phase 1C – expected completion in January 2023) or are permitted (Phase 1D). The remaining elements are to be included as part of the forthcoming LRD planning application (Phase 1E).

In effect, what remains to be delivered within the Portmarnock South lands following Phase 1E is only approximately 290no. units.

These remaining units are located north of the diagonal road between the Recorded Monuments and the implemented FCC Coastal Green way; known as the inter-monumental route.

No other structuring elements of the LAP require implementing other than roads and services commensurate to residential development proposed. What remains are effectively housing infill plots.

Based on the timelines shown for each phase of development the final phases of development would be targeted for submission in 2024 with permission expected the same year. As such, permission would be sought within a very short period after the LAP is to expire at which point the vast majority of the remaining LAP lands would have planning permission.

In the context of the Portmarnock South lands, Quintain are in control of all the lands for future development. Furthermore, they are funded to complete the entire development of the Portmarnock landbank. Assuming a grant of permission for the remaining units in 2024 and allowing a 2 – 3 year building programme the entire Portmarnock landbank could be complete by 2026.

For clarity, it is also worth noting in this submission that Quintain are fully supportive of the following Proposed Material Amendments as it pertains to Portmarnock South and would understand that these requirements can be readily addressed through a planning application process: -

PA CH 2.27 Self-Sustaining Towns Objectives, page 84

Include a new objective in Chapter 2, after CSO60 as follows: -

Mitigation Measures - Ensure that the mitigation measures as set out in the Portmarnock South and Baldoye Stapolin LAPs will continue to be implemented and managed in accordance with the requirements of the LAPs.

PA SEA 1: Self-Sustaining Towns Objectives, page 84

Include a new objective in Chapter 2, after CSO60 as follows: -

Mitigation Measures - Ensure that the mitigation measures as set out in the Portmarnock South and Baldoyle Stapolin LAPs will continue to be implemented and managed in accordance with the requirements of the LAPs.

PA AA 1: Self-Sustaining Towns Objectives, page 84

Include a new objective in Chapter 2, after CSO60 as follows: -

Mitigation Measures - Ensure that the mitigation measures as set out in the Portmarnock South and Baldoyle Stapolin LAPs will continue to be implemented and managed in accordance with the requirements of the LAPs.

6 OMISSION MAP BASED SPECIFIC OBJECTIVE FOR A LOCAL AREA PLAN

As set out in the Proposed Material Amendment, published on 11 November 2022, the following text in relation to the preparation of Local Area Plans was amended: -

PA CH 2.11: Section 2.4.1 Local Area Plans, page 56 Amend Section 2.4.1 as follows: -

~~*Fingal County Council will prepare these plans over the lifetime of the Development Plan, subject to resources.*~~

Following adoption of the Development Plan, a list of LAPs and other strategic plans to be prepared over the lifetime of the Development Plan will be drafted by the Planning Department based on the Council's priorities and subject to resources.

PA CH 2.27 Self-Sustaining Towns Objectives, page 84

Include a new objective in Chapter 2, after CSO60 as follows: -

Mitigation Measures - Ensure that the mitigation measures as set out in the Portmarnock South and Baldoyle Stapolin LAPs will continue to be implemented and managed in accordance with the requirements of the LAPs.

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PA AA 1: Self-Sustaining Towns Objectives, page 84

Include a new objective in Chapter 2, after CSO60 as follows: -

Mitigation Measures - Ensure that the mitigation measures as set out in the Portmarnock South and Baldoyle Stapolin LAPs will continue to be implemented and managed in accordance with the requirements of the LAPs.

Quintain are seeking clarity on the status of the LAP given that it is due to expire in July 2023. It may be the Council's intention to leave the LAP wither and allow the remaining development to occur in accordance with the 'RA' – Residential Area land use zoning objective. It is submitted that there may be some confusion if Map Based Objective LAP.9A on Map Sheet 9 is retained and this may be simply resolved by its omission.

The LAP Lifetime

The LAP (2013), was extended by resolution in May 2018 and is due to wither on 6 July 2023. Table 2.15: Operational Plan of the Draft Development confirms same.

While Map Based Objective LAP.9A on Map Sheet 9 of the Draft Development may well just reflect the current position i.e. that the LAP is in place, there is some ambiguity and it might be asserted that it implied that a **new** Local Area Plan will need to be prepared over the lifetime of the next Development Plan (2023 – 2029), despite the reference to the list of new Local Area Plans only being prepared after adoption of the County Development Plan.

It may be the Council's intention to leave the LAP wither and allow the remaining development to occur in accordance with the 'RA' – Residential Area land use zoning objective. However, there may be some confusion if Map Based Objective LAP.9A on Map Sheet 9 is retained and this may be resolved Development Plan by its omission.

We note that there is no direct or specific reference in the Draft Plan Written Statement or Proposed Material Amendments referring to the making of a new Local Area Plan for Portmarnock South once the existing withers. It appear to us that the map-based objective has either been left in error, or otherwise it should be clarified that it only relates to the existing LAP until it withers.

Requirement for a Local Area Plan

From the inception of the LAP, an upper threshold of c. 1,200no. dwellings (3,360no. people) was provided for subject to meeting the aviation density requirements arising from the LAP lands being within the Outer Public Safety Zone of Dublin Airport. Those aviation safety requirements result in only between 1,050 – 1,100 no. dwellings being capable of being delivered at Portmarnock South.

In relation to the preparation of Local Area Plans generally, Section 19 of the Planning & Development Act, 2000 as amended, ("the Act")states: -

*"19.—(1) (a) A **local area plan may be prepared in respect of any area**, including a Gaeltacht area, or an existing suburb of an urban area, **which the planning authority considers suitable** and, in particular, for those areas which require economic, physical and social renewal and for areas likely to be subject to large scale development within the lifetime of the plan.*

*(b) A **local area plan shall be made**, except for an area where a development plan of a former town council continues to have effect, in respect of an area which—*

(i) is designated as a town in the most recent census of population, other than a town designated as a suburb or environs in that census,

*(ii) **has a population in excess of 5,000, and***

(iii) is situated within the functional area of a planning authority which is a city and county council or a county council.

*(bb) Notwithstanding paragraph (b), a local area plan shall be made in respect of **a town with a population that exceeded 1,500 persons** (in the census of population most recently published before a planning authority makes its decision under subparagraph (i)) except where—*

(i) the planning authority decides to indicate objectives for the area of the town in its development plan under section 10(2), or

(ii) a local area plan has already been made in respect of the area of the town or objectives for that area have already been indicated in the development plan under section 10(2)."

As noted above, the envisaged population for LAP lands is below the general thresholds set out in the Act for the preparation of a Local Area Plan. Specifically, the Portmarnock South lands are not a *town* and as such the provisions of Section 19(1)(bb) do not apply in this case. Nor is it envisaged that Portmarnock South will have a population in excess of 5,000no. people. Arising from this, it would be our professional opinion that there is no requirement under the terms of the Act to prepare a Local Area Plan for Portmarnock South.

Furthermore, as set out in Section 5 above 576no. units are either completed / permitted and a further 192no. units will form part of a forthcoming LRD planning application, meaning that 70% of the planned dwelling units are already progressed through the planning stage. As such, c. 290no. units remain to be developed which is significantly below the general thresholds identified in the Act. Notwithstanding the lack of clarity noted in this submission regarding the intentions of the Council to prepare a new Local Area Plan for Portmarnock South, it would in any event seem unnecessary and a poor use of resources to do so given it would relate in reality to less than 300no. dwellings. This is particularly the case where the Council have already signalled their intention to continue to apply the mitigation measures of the current LAP to all new applications; thereby protecting the environmental attributes

of the lands. We note further that the new County Development Plan itself is also being scrutinised through the separate Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) assessments to ensure the relevant environmental protections, policies and objectives are being adhered to in this new County Development Plan.

Quintain has received legal advice to the effect that the way in which the Development Plan is currently set out they are exposed to challenges by way of Judicial Review in the event they were to secure a grant of planning permission in the absence of a valid Local Area Plan.

Planning History

The extensive planning history associated with these LAP lands has already been set out in Section 5 of this submission (See Appendix B for further detail).

Continuation of the Ecological Mitigation Measures

As presented in the Material Amendment, an additional objective has been included to ensure that the mitigation measures as set out in the Portmarnock South LAP will continue to be implemented and managed in accordance with the requirements of the LAP.

Quintain are fully supportive of this additional objective in the final County Development Plan. It remains Quintain's conviction that the remainder of the LAP lands can be developed in accordance with the 'RA' – Residential Area land use zoning objective once the LAP withers and does not require a new LAP to be prepared as a result.

As set out above and Section 5 above, all the key structuring elements have or will be implemented under planning applications to date and all that will ultimately remain is parcels of land to accommodate the remaining parcels of residential development.

We would note that any ecological studies required as part of the preparation of a new Local Area Plan would need to be prepared as part of any future planning application on the remaining undeveloped lands also. As such, the ecological mitigation measure would continue to be implemented to the Development Management process.

Remaining Development

Having regard to the location of the subject lands within the Outer Public Safety Zone of Dublin Airport, notwithstanding its location adjacent to Portmarnock Train Station (where a minimum net density of 50no. unit per Ha would be encouraged), the over-riding requirement is to ensure that the density of development provided on these lands adheres to the findings of the 2003 Environmental Resource Management (ERM) Report, which sets as its upper limit for development within such zones a density of 60no. persons for each 0.5 Ha.

There is a continual balance to be struck in seeking to attain the density provided for within the LAP and still adhering to the public safety provisions set out in the ERM Report. As such, the constructed and permitted development to date is compliant with the requirement of no more than 60no. persons per 0.5 Ha.

Furthermore, the ERM Report restricts the nature of development within the Public Safety Zones of Dublin Airport. Schools and childcare facilities are prohibited within the Public Safety Zones. This is acknowledged and affirmed in Section 4.2 of the LAP it states (*inter alia*) that: -

"As the lands are located within the Outer Public Safety Zone of Dublin Airport, schools and childcare facilities are not permitted uses within the RA (residential) zoning of the LAP lands".

As noted above, c. 290no. units remain to be developed which is significantly below the general thresholds identified in the Act.

Future Resources

The Draft Plan and subsequent Material Amendments appear to identify 13no. Local Area Plans which will require resources of the Council to prepare over the lifetime of the next Development Plan. This is likely to be a significant burden on the Planning Authority's resources to prepare all of these to the detail required with the Local Area Plan Guidelines for Local Authorities (2013).

Quintain are of the firm opinion that the LAP does not need to be renewed on the basis that: -

- The remaining development (c. 290no. units) can occur in accordance with the 'RA' – Residential Area land use zoning objective.
- The remaining development (c. 290no. units) is significantly below the requirements for the preparation of a Local Area Plan as set out in the Act.
- The key structuring elements of the LAP have or will be implemented.
- With the key structuring elements of the LAP implemented, all that will ultimately remain is parcels of land to accommodate the remaining phases of residential development.
- Quintain fully support the inclusion of an objective to implementation of the mitigation measures as set out LAP.
- Any new proposals brought forward by Quintain will need to be accompanied by appropriate survey data and assessments pertaining to the environmental factors relevant to the Portmarnock South lands.

6.1 Minor Modifications Being Sought

In presenting these Minor Modifications we have continued the approach of the Council and have used red strikethrough to denote omission, with green text to identify new text.

6.1.1 Requested Minor Modification / Clarification No. 1

For all the reasons set out above, we are seeking the omission of *Map Based Objective LAP.9A* for the a Local Area Plan for the Portmarnock landbank.

In the event the Council do not intend to prepare a new Local Area Plan for Portmarnock South in the lifetime of the County Development Plan 2023 – 2029, but rather are satisfied that the remaining provisions of County Development Plan could apply to any new development proposals the following modification is requested in the interests of certainty and clarity: -

MAP SHEET 9

In the interests of clarity as it is not the Council's intention to prepare a new Local Area Plan for Portmarnock South, that the Specific Objective "Subject to a Local Area Plan" denoted by a white hatch across the lands be omitted from Map Sheet 9 as it pertains to the Portmarnock South lands.

6.1.2 Requested Minor Modification / Clarification No. 2

If on the other hand it is the Council's intention to let the existing LAP wither but the *Map Based Objective LAP.9A* is to be retained we would suggest the following Objective be added beneath the proposed Material Amendment under Objective CSO60 so as to read as follows: -

PA CH 2.27 Self-Sustaining Towns Objectives, page 84

PA SEA 1: Self-Sustaining Towns Objectives, page 84

PA AA 1: Self-Sustaining Towns Objectives, page 84

Mitigation Measures – Ensure that the mitigation measures as set out in the Portmarnock South and Baldoyle Stapolin LAPs will continue to be implemented and managed in accordance with the requirements of the LAPs.

Mitigation Measures – Once the Portmarnock South LAP, as extended (provided for under “Objective LAP.9A”), withers that permission for any further development on these lands will be guided by the provisions of the County Development Plan as well as the mitigation measures of the former LAP (no new LAP will be necessary).

7 PRIORITISATION OF NEW PORTMARNOCK SOUTH LOCAL AREA PLAN

Wholly without prejudice to the balance of the submission above, should the Council consider that the Map Based Specific Objective “Subject to a Local Area Plan” – LAP.9A on Map Sheet 9 of the Draft County Development Plan should be retained, and a new Local Area Plan for Portmarnock South is to be prepared, Quintain maintain that the new Local Area Plan for Portmarnock South should be prioritised. The lands are serviced and highly accessible and should be recognised as such to ensure that the population targets set out in the Core Strategy of the new County Development Plan for Portmarnock are met.

The following provides an overview of the suitability of the Portmarnock lands to be priorities should be preparation of a new Local Area Plan for Portmarnock be considered necessary.

As we have noted above (Section 5 and further detailed in Appendix A and B of this submission), the key structuring elements of the current LAP are all addressed within the permissions and planning application processes in process to date.

7.1.1 Serviceability

Wastewater

JB Barry & Partners Consulting Engineers (retained Project Consulting Engineers) have liaised extensively with Irish Water since 2017 with regard wastewater capacity for development within the Portmarnock lands.

In Phase 1B an interim temporary pumping station was permitted and subsequently constructed. JB Barry & Partners Consulting Engineers have demonstrated to Irish Water that there is sufficient capacity in the existing Mayne Road Pumping Station to cater for each phase of development in conjunction with the interim temporary pumping station.

As part of the LRD consultation for Phase 1E, Irish Water provided a Confirmation of Feasibility (dated 25 January 2022) that wastewater connection is feasibly subject to upgrades. The upgrades broadly include additional operational storage (6 – 12 hours) and telemetry upgrades (to allow the 3no. pumping stations to communicate with one another e.g. Existing Portmarnock Bridge Pumping Station, Mayne Road Pumping Station and St. Marnock’s Temporary Pumping Station) – See Confirmation of Feasibility enclosed with this submission for reference. The upgrades required will form part of the ultimate Phase 1E LRD planning application which is consistent with the previous phases of development which were not objected to by Irish Water.

FCC Reg. Ref. F21A/0389 – Irish Water Wastewater Pumping Station

Permission was sought by Irish Water on 19 July 2021 for a Wastewater Pumping Station on lands located to the northeast of the LAP lands off Station Road. This will cater for the LAP lands and the wider Portmarnock catchment.

The proposal is currently subject to appeal (ABP Ref. ABP-314663-22 refers) and the case is due to be decided by 2 February 2023. Subject to a grant of permission by An Bord Pleanála the indicative timeline for completion of the new pumping station is mid 2025.

Surface water

The storm water network has been designed to cater for the development of the entire LAP lands. The regional wetland which provides surface water attenuation was delivered as part of Phase 1B. The regional wetland is operational.

As such, there is no capacity issue / impediments relating to the management of surface water. Notwithstanding, future development will be subject to further engagement with Irish Water to determine capacity.

Water Supply

Irish Water has confirmed to Quintain that connection to the water supply network is feasible without any infrastructure upgrades to facilitate Phase 1E. This has been the case for all previous phases of development also.

As such, there is no capacity issues / impediments relating to the water supply. Notwithstanding, future development will be subject to further engagement with Irish Water to determine capacity.

As can be seen from the above, the Portmarnock lands can be readily connected to existing services. **Objective 72a** of the National Planning Framework – Ireland 2040 (NPF) requires Planning Authorities to apply a standardised tiered approach to zoning of land and Appendix 3 of the NPF ‘A Methodology for a Tiered Approach to Land Zoning’ sets out a two-tier approach to land use zoning. The following is set out in relation to Tier 1: Serviced Zoned Land: -

“Tier 1: Serviced Zoned Land

*This zoning comprises lands that are **able to connect to existing development services**, i.e. road and footpath access including public lighting, foul sewer drainage, surface water drainage and water supply, for which **there is service capacity available**, and can therefore accommodate new development.*

*These lands will **generally be positioned within the existing built-up footprint of a settlement or contiguous to existing developed lands**. The location and geographical extent of such lands shall be determined by the planning authority at a settlement scale as an integral part of the plan-making process and shall include assessment of available development services.*

*Inclusion in Tier 1 will generally require the lands to be **within the footprint of or spatially sequential within the identified settlement**.”*

[Emphasis Added]

Furthermore, the development of the Portmarnock lands would be wholly consistent with Regional Policy Objectives (RPO) 5.5 of the Regional Spatial and Economic Strategy (RSES) which states: -

*“**RPO 5.5: Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs**, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.”*

[Emphasis Added]

The remainder of the LAP lands are serviceable and can be considered Tier 1: Serviced Zoned Lands having regard for the provision of the NPF. As such, these lands should be priorities for development to achieve the targets set out in the Core Strategy of the Draft Plan.

7.1.2 Accessibility

The Draft Plan is informed by an Urban Capacity Assessment (UCA). This is intended to: -

“...provide the analysis to support a sustainable integrated land-use planning and transportation approach.”

The UCA identifies Urban Capacity Sites (UCS), and calculates potential residential yield from each site, based on the individual characteristics and location of each site. This study places a particularly strong emphasis on the sustainable mobility credentials of each site, as follows: -

*“Regard has been given to the position of each settlement within the existing County Settlement Hierarchy which encourages increased residential and economic growth and consolidation of the urban form, **including the location of settlements proximate to public transit which can promote sustainable transport patterns and reduced reliance on private car for accessibility**. Further to that, spatial analysis of each site is undertaken to determine proximity to transit routes and nodes including; existing bus routes, Irish Rail trains and Dart stations, and taking into account, future public transit upgrades including the Luas-Fingal and Metro North lines insofar as possible, and where appropriate.”*

[Emphasis Added]

The following provides an overview of the accessibility of the Portmarnock lands: -

- **Train Connections**

All of the Portmarnock lands are within 750m – 1km of the existing Portmarnock Train Station which is served by commuter train (Dublin – Belfast) and DART.

The frequency and therefore the capacity of this service will be significantly improved through the implementation by Irish Rail of the DART+ upgrade to this rail line which will result in a DART service between Dublin City Centre and Drogheda being operational.

- **Bus Connections**

The Portmarnock lands are currently served by Dublin Bus Route 32, 32x, 102 and 42d.

Phase 1 of the new BusConnects network launched in June 2021. H2 – Malahide to City Centre (every 30min. Monday – Sunday) currently serves the Portmarnock lands (See figure 7 below). Future upgrades under BusConnects include: -

- X78 – Malahide to University College Dublin via the City Centre (4no. services on weekdays).
- L81 – Portmarnock Train Station to Sutton DART Station (Every 20mins Monday – Friday; and every 30 minutes on Saturday & Sunday).



Figure 4: Extract from BusConnects Revised Network Map with Portmarnock lands indicated by yellow star (Overlay by SLA) (Source: www.busconnects.ie).

- **Pedestrian / Cycle Connections**

A series of pedestrian / cycle links towards Portmarnock Train Station have been implemented in Phase 1A along the western edge of the Lap lands, in Phase 1B along Station Road as well as a connection to the implemented FCC Greenway. Further pedestrian / cycle links are provided in Phase 1C.

Further connections to the FCC Greenway are indicated in both permitted Phase 1D and as part of the forthcoming LRD planning application for Phase 1E.

The FCC Greenway which runs parallel to the Coast Road was opened in June 2020 and connects Baldoyle with Portmarnock and will be extended further as part of the Malahide (north) and Sutton (south).

- **Road Connections**

There is currently direct connection to Station Road. The future connection to Moyne Road has been permitted under Phase 1D. The M50 is approximately a 13 minute drive with Dublin Airport a 15 minute drive.

The development of the Portmarnock lands would be wholly consistent with RPO 5.3 of the RSES which states: -

RPO 5.3: Future development in the Dublin Metropolitan Area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.

The Portmarnock lands are exceptionally well services by current public transport and will benefit further the implementation of future BusConnects routes. The lands are highly accessible for pedestrian and cyclists given the existing and permitted infrastructure.

Due to the proximity of the subject lands to the existing rail station, the existing greenway links and a Local Centre (nearing completion), the lands at Portmarnock South are capable of delivering a rail-based sustainable community which will assist in meeting the Government’s Climate Action Plan objectives.

7.1.3 Flooding

The Strategic Flood Risk Assessment (SFRA) was prepared with the Draft Plan. The SFRA is accompanied by a series of Strategic Flood Risk Maps which shows that the Portmarnock South lands where residential development is envisaged are not within a floodzone.

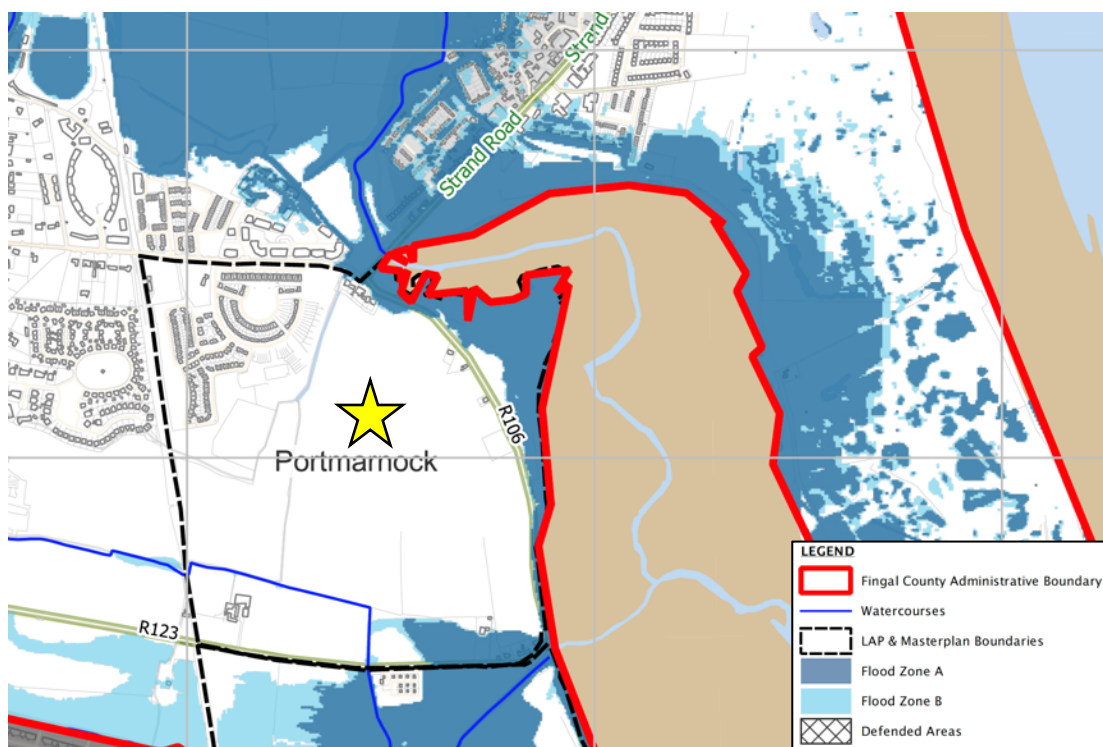


Figure 5: Extract from M02127-06_FIG_FL122-04 Flood Zone Map of the SFRA accompanying the Draft Plan.

As can be seen from the above, the Portmarnock lands are entirely suitable for developments as they are not within a floodzone. Notwithstanding, any future development proposal will be accompanied by a Site Specific Flood Risk Assessment.

7.1.4 Amenities

The lands transferred to Fingal County Council in Phase 1A were subject to an application (ABP Ref. ABP-311315-21 refers) to An Bord Pleanála under Section 177AE of the Act to carry out a park development project at the Racecourse Park located between Baldoyle and Portmarnock, Co. Dublin.

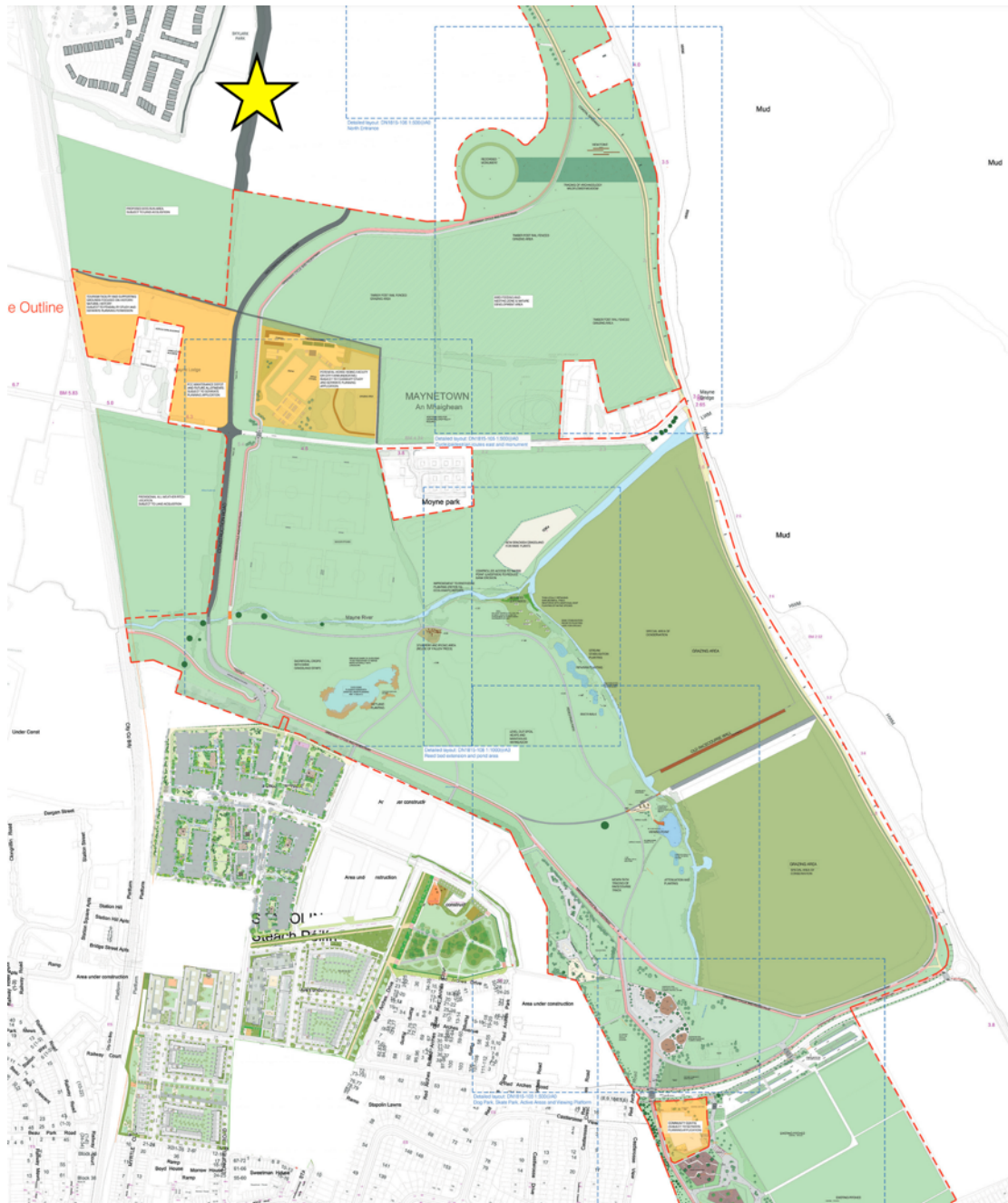


Figure 6: Extract from Fingal County Council website showing the landscape masterplan as part of the application to An Bord Pleanála (ABP Ref. ABP-311315-21 refers). Portmarnock lands shown indicatively with yellow star (Overlay by SLA). Note: Permitted Moyné Road access road (Phase 1D) is shown in this plan also.

Permission was granted for the Racecourse Park development in September 2022. This significant amenity is within walking distance of the Portmarnock lands connected by both existing and permitted infrastructure.

7.1.5 Summary

The Portmarnock lands have direct access to wastewater and water supply and can be considered Tier 1: Serviced Zoned Lands having regard for the provision of the NPF. The Draft County Development Plan 2023 – 2029 confirms this to be the case also.

Surface water infrastructure implemented in Phase 1B has been designed to cater for all of the development in the LAP.

The Portmarnock lands benefit from a range of high quality public transport including commuter rail, DART and bus. Further improvements will be made to the bus services under BusConnects.

Portmarnock South lands are not within a floodzone.

This future Racecourse Park is within walking distance of the Portmarnock lands connected by both existing and permitted infrastructure. This is a significant amenity on the doorstep of prospective residents of residential development in Portmarnock.

7.2 Minor Modification Being Sought

It is requested that the following Minor Modification be included: -

PA CH 2.9: Section 2.4.1 Local Area Plans, page 55

Include additional text directly before the heading “Operational LAPs” on page 55 of the Draft Development Plan as follows:

The preparation of a new Local Area Plan for Portmarnock South shall be commenced within 6 months of the adoption of the County Development Plan 2023 – 2029 and in the interim, pending adoption of a new Local Area Plan development may continue to be permitted subject to complying with the mitigation measures contained in the Portmarnock South Local Area Plan 2013 – 2019, as extended.

8 SUBMISSION REQUEST & CONCLUSION

Quintain are seeking the omission of *Map Based Specific Objective 'Subject to Local Area Plan' - LAP.9A* in respect of the Portmarnock South landbank. Quintain are of the firm opinion that the LAP does not need to be renewed on the basis that: -

- The remaining development (c. 290no. units) can occur in accordance with the 'RA' – Residential Area land use zoning objective.
- The remaining development (c. 290no. units) is significantly below the requirements for the preparation of a Local Area Plan as set out in the Act (i.e. 5,000no. units).
- The key structuring elements of the LAP have been implemented (Phase 1A & 1B – completed and Phase 1C – expected completion in January 2023) or will be implemented (permitted Phase 1D and future LRD planning application for Phase 1E).
- Quintain fully support the inclusion of an objective to implementation of the mitigation measures as set out LAP as set out in the Proposed Material Amendments.
- With the key structuring elements of the LAP implemented, all that will ultimately remain is parcels of land to accommodate the remaining parcels of residential development.

However, should the *Map Based Objective LAP.9A* not be omitted from Map Sheet 9 we request that Table 2.16 – Schedule of Local Area Plan to be commenced over the Plan Period, be updated to include Portmarnock South Local Area Plan. Quintain maintain that the new Local Area Plan for Portmarnock should be prioritised on the basis that the Portmarnock lands are services and highly accessible and should be recognised as such to ensure that the population targets set out in the Core Strategy of the Draft Plan for Portmarnock are met.

Our Client has received legal advices to the effect that the way in which the Development Plan is currently set out they are exposed to challenges by way of Judicial Review in the event they were to secure a grant of planning permission in the absence of a valid Local Area Plan.

The following Modifications are therefore being sought: -

8.1 Requested Minor Modification / Clarification No. 1

In the event the Council do not intend to prepare a new Local Area Plan for Portmarnock South in the lifetime of the County Development Plan 2023 – 2029, but rather are satisfied that the remaining provisions of County Development Plan could apply to any new development proposals the following modification is requested in the interests of certainty and clarity:-

MAP SHEET 9

In the interests of clarity as it is not the Council's intention to prepare a new Local Area Plan for Portmarnock South, that the Specific Objective "Subject to a Local Area Plan" denoted by a white hatch across the lands be omitted from Map Sheet 9.

8.2 Requested Minor Modification / Clarification No. 2

If on the other hand it is the Council's intention to let the existing LAP wither but the *Map Based Objective LAP.9A* is to be retained we would suggest the following Objective be added beneath the proposed Material Amendment under Objective CSO60 so as to read as follows: -

PA CH 2.27 Self-Sustaining Towns Objectives, page 84

PA SEA 1: Self-Sustaining Towns Objectives, page 84

PA AA 1: Self-Sustaining Towns Objectives, page 84

Mitigation Measures – Ensure that the mitigation measures as set out in the Portmarnock South and Baldoyle Stapolin LAPs will continue to be implemented and managed in accordance with the requirements of the LAPs.

Mitigation Measures – Once the Portmarnock South LAP, as extended (provided for under “Objective LAP.9A”), withers that permission for any further development on these lands will be guided by the provisions of the County Development Plan as well as the mitigation measures of the former LAP (no new LAP will be necessary).

8.3 Requested Minor Modification No. 3

In the alternative, where the Council in fact do intend to prepare a new Local Area Plan for Portmarnock South in the lifetime of the County Development Plan 2023-2029, the following modification is requested: -

PA CH 2.9: Section 2.4.1 Local Area Plans, page 55

Include additional text directly before the heading “Operational LAPs” on page 55 of the Draft Development Plan as follows:

The preparation of a new Local Area Plan for Portmarnock South shall be commenced within 6 months of the adoption of the County Development Plan 2023 – 2029 and in the interim, pending adoption of a new Local Area Plan development may continue to be permitted subject to complying with the mitigation measures contained in the Portmarnock South Local Area Plan 2013 – 2019, as extended.

We trust that the Council will have regard to our Clients submission when making the new County Development Plan 2023 – 2029.

STEPHEN LITTLE & ASSOCIATES

21 December 2022

ENCL./

- Confirmation of Feasibility, dated 25 January 2022 from Irish Water (related to Phase 1E).

9 APPENDIX A – SITE DESCRIPTION & PLANNING POLICY CONTEXT

9.1 Site Description

The subject lands are located in the townlands of Drummigh, Maynetown and Portmarnock, Portmarnock, Co. Dublin. The lands are generally bounded by Station Road to the north, Coast Road and the Baldoyle Road to the east, Moyne Road to the south and the Dublin – Belfast Train Line to the west.

The subject lands are located approximately 650m – 1km south west of existing Portmarnock Village which includes a range of additional amenities including; shops, medical facilities (doctor surgery, dentist & pharmacy), cafes and restaurants.

The lands are served by Portmarnock Train Station located immediately to the northwest of the landbank which provides direct links to both Dublin City centre and Belfast City centre. Under the DART+ project being progressed by Irish Rail, the line is scheduled to be electrified and will result in a DART type service catering to the lands once completed. These lands are therefore ideally positioned to create a new rail based sustainable community where more sustainable commuting patterns will be feasible and will thereby directly contribute to meeting our Climate Action Plan targets.



Figure 7: Drone Image showing the extent of development within the Portmarnock landbank by Quintain to date.

9.2 Portmarnock South Local Area Plan 2013 (As Extended)

The LAP sets out a clear framework for the development of these lands generally and the following parameters are in place regarding density and ultimate capacity of the lands zoned ‘RA’ – Residential Area: -

- Up to 1,200no. residential units can be accommodated.
- Equivalent to 3,360no. people.
- That ‘no single half hectare plot should accommodate more than 60no. persons’ due to aviation safety constraints.



Figure 8: Extract from the LAP showing the all the lands where residential development will generally extend southeast from the Portmarnock Train Station.

The key structuring elements of the LAP are identified in *Figure 5.2 – Green Infrastructure and Landscape Strategy* and *Figure 6.4 – Indicative Internal Street and Movement Network of the LAP* (See extracts from the LAP below).

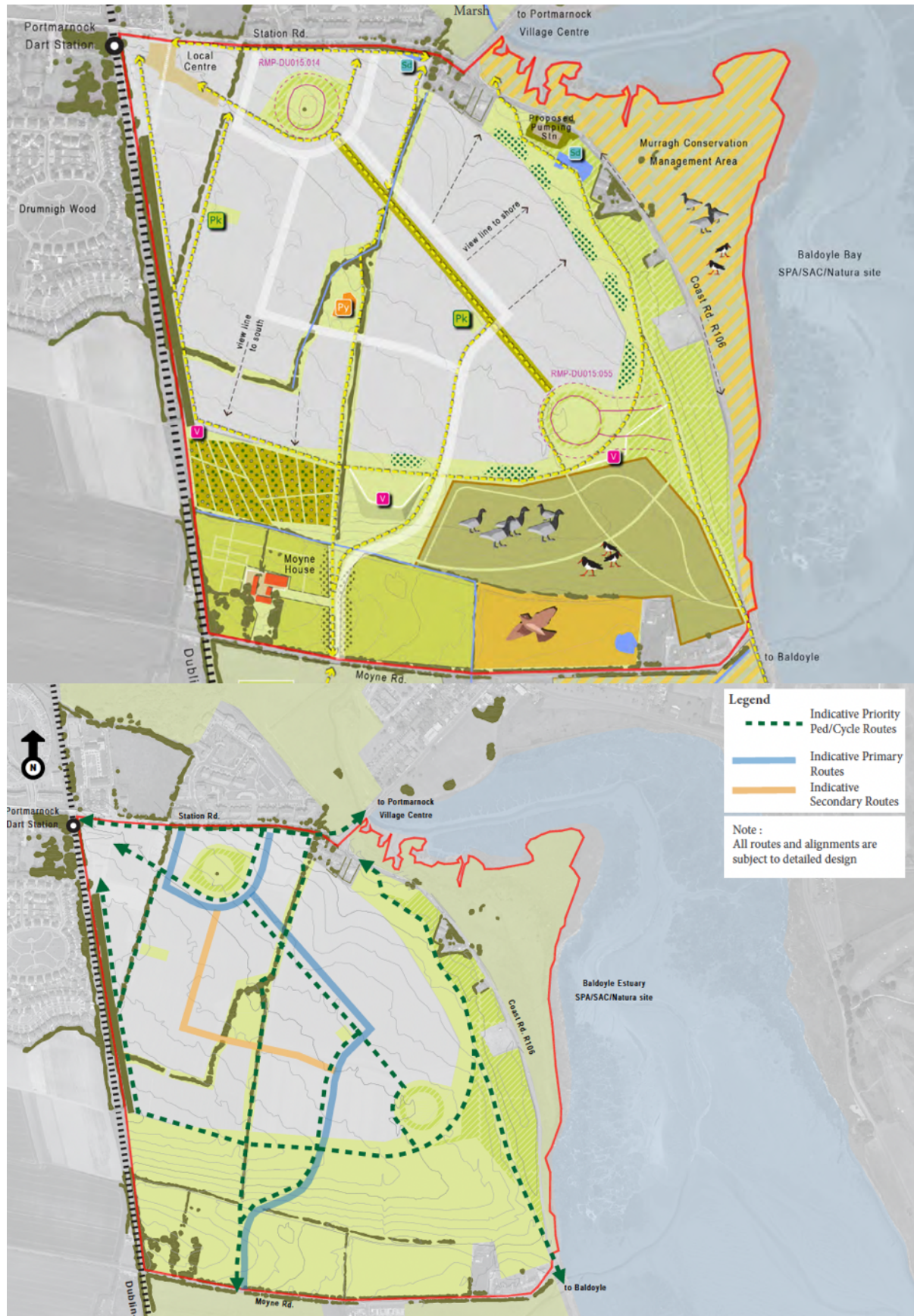


Figure 9: Extract from the LAP showing the landscaping (Figure 5.2) and roads (Figure 6.4) strategy which in effect once accommodated / implemented identify the areas where residential development can be accommodated.

As such, the following are the main structuring elements of LAP include: -

- Integration of the Recorded Monuments (RMP-DUO 15:014 and RMP-DUO 15:015).
- Integration of the Townland Boundaries.
- Provision of Skylark Park.
- Implementation of the Ecological Buffer including Murragh Spit and Bird Quite Zone (c. 107 Ha – Transferred to Fingal County Council in June 2018).
- Regional SuDs infrastructure.
- Local Centre.
- Primary Route including access onto Station Road and link toward Moyne Road.
- Secondary Route.
- Series of interconnected pedestrian / cycle links towards Portmarnock Train Station including along Station Road connecting back to Greenway (FCC delivered the coastal Greenway and this is operational).

9.3 Draft Fingal County Council Development Plan 2023 – 2029

The subject lands are zoned ‘RA’ (Residential Area), ‘RS’ (Residential) and ‘OS’ – Open Space the objectives of which aim to: -

Objective RA – Residential Area

“Provide for new residential communities subject to the provision of the necessary social and physical infrastructure.”

Objective RS – Residential

“Provide for residential development and protect and improve residential amenity.”

Objective OS – Open Space

“Preserve and provide for open space and recreational amenities.”

The lands are also subject to a Map Based Specific Objective (LAP.9A) which confirms that the lands are *Subject to a Local Area Plan.*



Figure 10: Extract from the Map Sheet 9 of the Draft Fingal County Council Development Plan 2023 – 2029.

The lands zoned 'RS' – Residential and 'OS' – Open Space clearly demonstrate how the structuring principle of the LAP have been implemented to date.

Section 5 above sets out how Quintain have developed the LAP lands to date in accordance with the framework identified in the LAP.

10 APPENDIX B – PLANNING HISTORY OVERVIEW

10.1 FCC Reg. Ref. F13A/0248 – Phase 1A

Permission granted on 29 July 2014 for development comprising 101no. dwellings including, vehicular access onto Station Road, extension to the existing footpath and cycle along Station Road and all associated and ancillary site development works.

Phase 1A is now complete and fully occupied.

LAP structuring elements implemented: -

- Implementation of the Ecological Buffer including Murragh Spit and Bird Quite Zone (c. 107 Ha – Transferred to Fingal County Council in June 2018).
- Part implementation of the Primary Route including access onto Station Road.
- Pedestrian / cycle links towards Portmarnock Train Station along western boundary of LAP lands.

10.2 ABP Reg. Ref. 300514-17 – Phase 1B

Permission granted on 23 March 2018 for development comprising 150no. residential units, vehicular access off Station Road, 2no. areas of open space, integration of the northern Recorded Monument (RMP-DUO 15:014), cycle / walking route along Station Road, a detention pond, a temporary foul water pumping station and wastewater storage tank and a regional wetland area located to the east alongside Strand Road and all associated and ancillary site development works.

Phase 1B is now complete and fully occupied.

LAP structuring elements implemented: -

- Integration of the Recorded Monuments (RMP-DUO 15:014).
- Provision of initial length of inter-monumental route
- Integration of the Townland Boundaries (partial from Station Road to north of future Skylark Park).
- Regional SuDs infrastructure.
- Further implementation of Primary Route including and second access onto Station Road.
- Pedestrian / cycle links towards Portmarnock Train Station along Primary Route and within Townland Boundary linear park.

Timeline

Permission Sought	Permission Granted	Development Completed
20 December 2017	23 March 2018	2021

10.3 ABP Ref. 305619-19 – Phase 1C

Permission granted on 30 January 2020 for development comprising 153no. residential units, 3no. retail units, café, restaurant, medical / community unit (Local Centre) and all associated and ancillary site development works.

Phase 1C is under construction and is expected to be completed in January 2023.

LAP structuring elements implemented: -

- Local Centre.
- Secondary Route.

Timeline

Permission Sought	Permission Granted	Development Completed
11 November 2019	30 January 2020	Under construction / complete in January 2023.

10.4 ABP Ref. 312112-21 – Phase 1D

Permission granted on 9 May 2022 for development comprising 172 no. residential units, Skylark Park, upgrades to interim pumping station, permanent road connection south to Moyne Road and all associated and ancillary site development works.

This permission is now subject to a Judicial Review with a Judgement pending.

LAP structuring elements implemented: -

- Integration of the remainder of the Townland Boundaries.
- Provision of Skylark Park.
- Final section of Primary Route including link towards Moyne Road.
- Pedestrian / cycle links towards Portmarnock Train Station along Primary Route and within Townland Boundary linear park.

Timeline

Permission Sought	Permission Granted	Development Completed
3 December 2021	9 May 2022	Not yet commenced

10.5 LRD0002/S2 – Phase 1E

LRD pre-planning consultation has been completed for Phase 1E which comprises 192no. residential units, integration of the southern Recorded Monument (RMP Ref. DU015-055), upgrades to interim pumping station and all associated and ancillary site development works.

LAP structuring elements implemented: -

- Integration of the Recorded Monuments (RMP-DUO 15:015).
- Final section of inter-monumental route
- Pedestrian / cycle links connecting back to Greenway.

Timeline

Permission Sought	Permission Granted	Development Completed
Q1 2023	Early Q2 2023	TBC

Stephen Little & Associates are committed to progressing and achieving sustainable development goals.

**Chartered Town
Planners and
Development
Consultants**

Address:
26/27
Upper Pembroke Street
Dublin 2, D02 X361

Contact:
t: 353-1 676 6507
info@sla-pdc.com
sla-pdc.com