



Senior Executive Planner,
Planning and Strategic Infrastructure Department,
Fingal County Council,
County Hall, Main Street,
Swords, Co. Dublin,
K67 X8Y2

16th December

Re: Submission on the Proposed Material Alterations to the Draft Fingal Development Plan 2023-2029 (Stage 3) relating to Lands located at Rathbeale Road, Swords, Co. Dublin

Dear Sir/Madam,

Hughes Planning and Development Consultants, 85 Merrion Square, Dublin 2 have been instructed by our client, Uniplumo Ireland Ltd., Charles McCann Building, Rampart Road, Dundalk, Co. Louth to make a submission on the Proposed Material Alterations to the Draft Fingal Development Plan 2023-2029, with respect to the former site of the Uniplumo Ireland premises, Rathbeale Road, Swords Co. Dublin. Stage 3 of the plan-making process, the Proposed Material Alterations to the Draft Plan, originated from the consideration of the submissions received by the Planning Authority between February and May 2022 on the Draft Fingal Development Plan 2023-2029. The Chief Executive's Report was considered by the Elected Members at Special Council Meetings held in September and October 2022, where they resolved to amend the Draft Plan. Subsequently, and in accordance with Section 12(7)(b) of the Planning and Development Act 2000 (as amended), the Proposed Material Alterations we published on the 11th November. This submission has been prepared in response to public notices dated 11th and 24th November respectively, inviting submissions from interested parties, up until 22nd December 2022, in relation to the proposed Material Alterations to the Draft Fingal Development Plan 2023-2029.

This submission is prepared on foot of a formal submission made on the Draft Plan on behalf of our clients **FIN-C453-807** in respect of the Rathbeale Road Uniplumo site which requested the rezoning of the lands from 'GB – Greenbelt' to 'RA – Residential' together with an extension to the western development boundary of Swords to include our clients' lands.



Figure 3.0 Aerial image indicating the submission lands (red outline) in the context of its immediate surrounds, with the area suitable for residential development outlined in blue

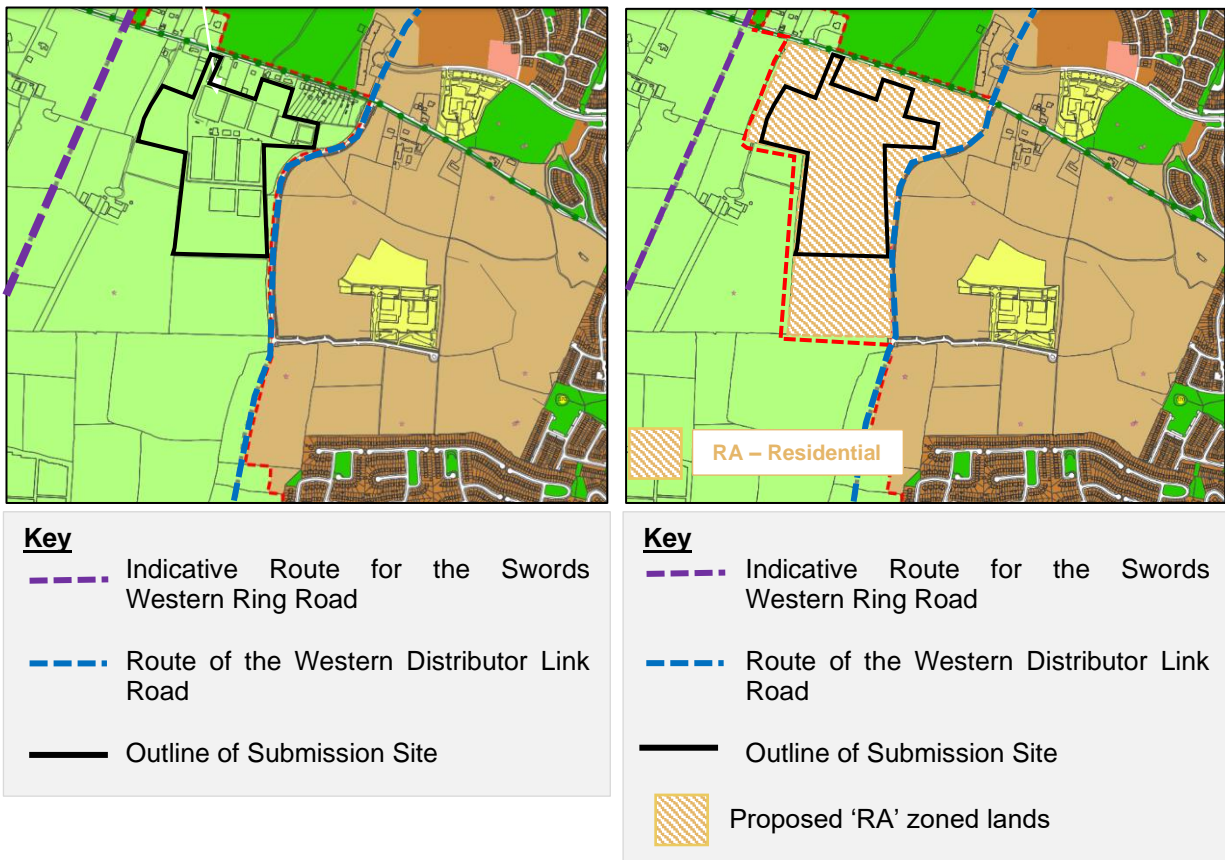


Figure 2.0 Extract from the Draft Fingal Development Plan (Sheet 8) showing the Uniplumo lands outlined in black (left) and extract from the Draft Fingal Development Plan (Sheet 8) showing the proposed additional 'RA - Residential Area' zoned lands, together with the proposed extension of the Swords Development Boundary (as per the Uniplumo Submission FIN-C453-807).

Whilst these requests were not implemented as part of the Plan, we consider it prudent to reiterate, notwithstanding the provisions of Section 12(9)(c) of the Planning and Development Act, 2000 (as amended) which limit modifications to any proposed alterations to a Development Plan, that a proposed rezoning of our clients lands is entirely appropriate in light of the site's strategic location on the periphery of Swords, the rapidly changing context of the surrounding lands to accommodate medium density residential development, and importantly, in the interests of providing additional serviceable, zoned lands to provide much needed starter and social and affordable homes at a time when Ireland is facing its most severe housing crisis.

This submission also has regard to the proposed introduction of a new Local Area Plan (LAP) designation and boundary for Swords as per Proposed Material Alterations **PA SH 8.8** and **PA CH2.10**. Given the location of the subject lands to the immediate west and south of the Swords Development Boundary and the limited availability of residentially zoned, serviceable and available within the Town and its environs, it is submitted that the inclusion of our clients' lands within this LAP boundary represents a logical and justifiable extension as demonstrated in the map extract overleaf.

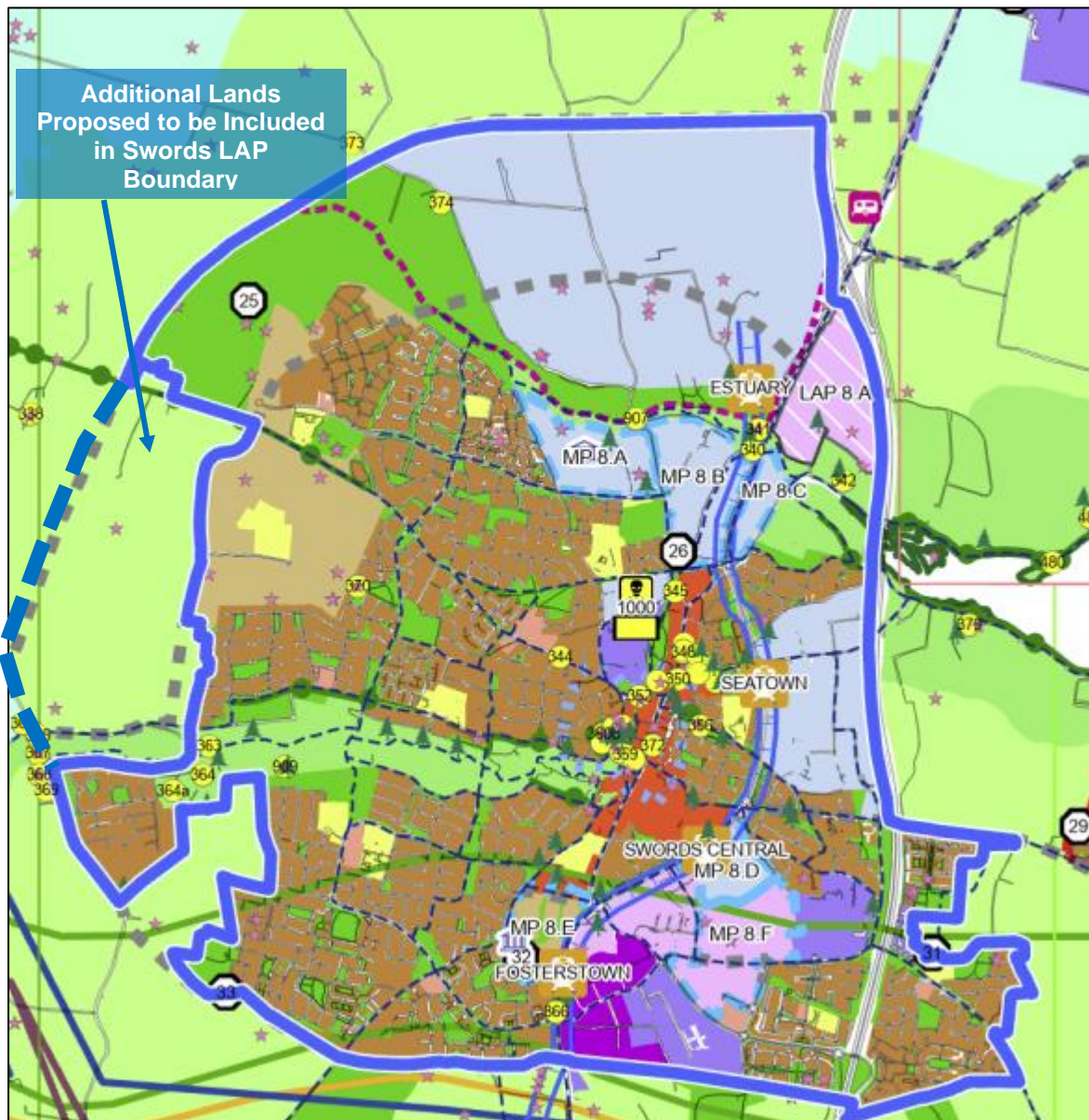


Figure 3.0 Extract from the Fingal Draft Development Plan Map Sheet 8 showing the proposed Swords Local Area Plan Boundary in blue (PA SH 8.8). The proposed extension to this boundary as suggested in this submission is indicated with a dashed blue line.

Further, we note the recent publication of the *'Outline for the proposed Planning and Development Bill'* by the Department of Housing, Local Government and Heritage in December 2022. The *Outline* confirms that the new Bill will be published in early January 2023 and will then be provided to the Oireachtas for pre-legislative scrutiny.

Importantly, this outline document sets out the proposed approach to plans at national, regional and local levels and provides that local authority Development Plans are the critical local expression of the future development of a city or county, reflecting national and regional perspectives. Under the new Bill, the duration of such plans, such as the Fingal Development Plan 2023-2029, will be extended to a **10-year cycle**, with a review after year five and a greater focus on strategies that comprise spatial planning framework for decision making. In light of this proposed amendment to the life span of Development Plans, it is critical that a sufficient supply of appropriately zoned lands is put forward to accommodate anticipated population growth over this extended time period. In our view, the currently available lands within the town of Swords and its environs are

simply not adequate to harbour the envisaged growth for Swords over the coming ten years. The rezoning of our clients' lands for residential uses will aid in responding to this inevitable shortfall.

Our client welcomes the opportunity to contribute to the third stage of the development plan process for drafting the Fingal Development Plan 2023-2029, for the reasons set out in this submission and in consideration of the future legislative changes to the life-cycle of Development Plans that is forthcoming, we would strongly encourage Fingal County Council to reconsider their position and see fit in the interests of proper planning and sustainable development to increase the quantum of residentially zoned lands within the Swords environs to ensure that the long-term ambitious approach for the development of Swords as the County Town and for its growth to a city of a sizeable scale is realised.

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



Kevin Hughes MIPI MRTPI
for HPDC Ltd.

ⁱ <https://www.gov.ie/en/publication/1b115-outline-of-the-proposed-planning-and-development-bill/>