

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

Date: 21/12/2022
Our Ref: KK JN 22101

Dear Sir or Madam,

RE: SUBMISSION ON THE PROPOSED MATERIAL ALTERATIONS TO THE DRAFT FINGAL COUNTY DEVELOPMENT PLAN 2023-2029 ON BEHALF OF BLANCHE RETAIL NOMINEE LIMITED IN REGARD TO LANDS AT BLANCHARDSTOWN TOWN CENTRE, BLANCHARDSTOWN, DUBLIN 15

1.0 INTRODUCTION AND EXECUTIVE SUMMARY

On behalf of our client, Blanche Retail Nominee Limited, 2nd Floor, 1-2 Victoria Buildings, Haddington Road, Dublin 4, we, John Spain Associates, 39 Fitzwilliam Place, Dublin 2, wish to make a submission in respect of the Proposed Material Alterations (PMA's) to the Draft Fingal County Development Plan 2023-2029 in relation to our client's lands at Blanchardstown Town Centre, Blanchardstown, Dublin 15.

The key requests made in this submission in the context of the Proposed Material Alterations are summarised below, and include (1) requested amendments in respect of the minimum open space requirement to revert to 10% for infill/brownfield sites; (2) omission of the objective in respect of monetary value in lieu of play facilities; and also (3) the omission of the objective repeating the requirement for a local transport plan of relevance to Blanchardstown Town Centre, having regard to the future residential, commercial and associated development proposed for this Major Town Centre and key settlement in Dublin City and Suburbs Consolidation Area.

Planning and Development Context

Blanche Retail Nominee Limited are the owners of lands at and operate Blanchardstown Town Centre (including the Blanchardstown Centre, adjoining retail parks and associated development), Blanchardstown, Dublin 15, which is designated as a Major Town Centre in the current and Draft Development Plan. It is one of the key retail locations within Fingal and the Greater Dublin Area and has in excess of 170,000 sq.m of retail floor space. It has evolved to become the commercial, civic, recreational and transportation hub of the area,

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including a number of taller buildings, but with an urban environment which is more dominated by existing large scale retail units and surface parking. Therefore, Blanchardstown Town Centre provides a significant opportunity for consolidation, densification and delivery of residential development through the redevelopment of the existing surface car parks in accordance with national planning policies which encourage infill and brownfield development and compact growth rather than greenfield development and by intensification at appropriately identified locations (such as Town Centres well served by existing and planned public transport), as reflected in the Draft Plan.

Our client has to date and will continue to develop Blanchardstown Town Centre, in consultation with the Planning Authority, as a “place to live”, with a significant increase of integrated residential development planned for the Town Centre and further plans to continue ongoing expansion of the food and beverage, retail, leisure and cultural / community offer in line with the planning policy framework.

Our client and their appointed design team have been actively engaging with the Planning Authority in respect to the future potential of the overall Town Centre lands and have progressed an overall vision / framework plan for their lands, which seeks to build on the 2009 Masterplan / Framework Plan and envisages a substantial increase in residential development within the Town Centre, to align more closely with the national, regional, and local planning policy framework.

Recent Planning History

A planning application (Reg. Ref.: FW22A/0047) was submitted to FCC on the 11th March 2022 relating to Site B, i.e. the Library Car Park, and Site C, i.e. the Blue Car Park, sites at Road C and Road D, Blanchardstown Town Centre, Coolmine, Dublin 15, for a mixed use development consisting of the construction 352 no. apartments and ancillary resident amenity floorspace, 5 no. commercial units and 1 no. community facility in six buildings ranging from 5 no. to 13 no. storeys in height. The development also included for an extension of the existing multi storey car park. An FI Request was received from FCC dated the 5th May 2022, primarily raising detailed design issues which require further information / revised details to be submitted. A notification of decision to grant permission was issued by FCC on the 3rd October 2022 subject to 36 no. conditions. Condition no. 3 required some amendments to the scheme, including the omission of 4 no. units, thereby providing a permission for 348 residential units and associated development. A First Party Appeal was submitted to An Bord Pleanala on the 1st of November 2022 (ABP Ref.: 314985-22) in relation to Conditions 33 and 34, which solely relates to development contributions. No third party appeals were submitted to An Bord Pleanala in respect of the notification of decision to grant. Therefore, a final grant of permission can be issued subject to the applicant furnishing the Planning Authority security for payment of the full amount of the contributions, pending the outcome of the first party appeal.

A Large-scale Residential Development (LRD) application was submitted to FCC (Reg. Ref.: LRD0001/S3) on the 9th November 2022 relating to Site A (White Car Park) at Blanchardstown Town Centre, Coolmine, Dublin 15. The proposed LRD comprises the construction of a mixed use development, consisting of 971 no. apartments in 7 no. buildings ranging from 1 no. to 16 no. storeys in height, over a basement level, and provision of a Mobility Hub, with 7 no. levels. The development includes 7 no. commercial units in Blocks A, C, G and the Mobility Hub, 1 no. Community Facility and 1 no. Place of Worship in the Mobility Hub, 1 no. Childcare Facility in Block A, and ancillary resident amenity floorspace to serve the residential units (in Blocks A, B, D, E and F), and all associated infrastructure. A decision is due from the Planning Authority on the 13th January 2023.

Blanchardstown Town Centre also forms part of the NTA's BusConnects proposals, of which there is an application currently before the Board for the Blanchardstown to City Centre Core Bus Corridor Scheme under ABP Ref.: 313892-22. A decision is due from the Board by the 11th January 2023.

Summary of the Key Requests of this Submission

The key requests made in this submission in respect of the Proposed Material Alterations are summarised below:

- **Submission Request 1 – Proposed Material Alteration No. PA CH 4.1 and PA CH 4.5 – Omission of amendments to the Open Space Requirements for Infill / brownfield / town centre sites:** It is respectfully submitted that Proposed Material Alteration PA CH 4.5 is omitted. It is considered that the proposed alteration to require 12% open space (and potentially up to 15% depending on the interpretation of the alterations) on infill, brownfield and town centre sites is contrary to, and inconsistent with, national planning policy and S. 28 Ministerial Guidelines. National planning policy documents recommend providing a flexible approach to open space provision, in particular the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) state that for '*large infill sites or brownfield sites public open space should generally be provided at a minimum rate of 10% of the total site area*' and that it will be necessary for planning authorities to take a more flexible approach to quantitative open space standards and put greater emphasis on the qualitative standards. Section 28 of the Planning and Development Act 2000 (as amended) provides that in having regard to ministerial guidelines, planning authorities are required to consider the objectives and policies of such guidelines when preparing and making the draft development plan and the development plan.
- **Submission Request 2 – Proposed Material Alteration No. PA CH 14.6 – Omission of Objective requiring Monetary Value in Lieu of Play Facilities:** It is respectfully submitted that Proposed Material Alteration PA CH 14.6 is omitted. It is considered that this objective, combined with the draft Plan requirements on play facilities (objectives DMS070 and DMS071), represents a significant constraint particularly in respect of infill, brownfield and town centre development sites, which generally are more constrained (compared to a greenfield site) and particularly town centre zoned sites which are required to provide for a higher density residential development in accordance with national planning policy. This objective is not consistent with the children's play needs for apartment developments as outlined in the Apartment Guidelines 2020, and is considered more relevant to a typical lower density housing scheme rather than a higher density apartment scheme, as it does not allow for any offset for those units that are unlikely to generate a demand for play provision. Furthermore, reference is made in the proposed objective that the monetary value is '*to be in line with the Fingal County Council Development Contribution Scheme*', however the Fingal County Council Development Contribution Scheme 2021-2025 does not include for provision of a financial contribution in lieu of play facilities, which creates uncertainty for residential developers in bringing forward schemes and estimating the costs involved, which is particularly problematic with current inflation levels.
- **Submission Request 3 – Proposed Material Alteration No. PA CH 6.8 – Omission of Objective requiring a Local Transport Plan for Blanchardstown Centre:** It is respectfully requested that the Proposed Material Alteration No. PA CH 6.8 requiring a Local Transport Plan for the 'Blanchardstown Centre' is omitted (we

note in any instance that this should be referring to ‘Blanchardstown Town Centre’, as the shopping centre element of the Town Centre is better known as the Blanchardstown Centre). It is not considered necessary for this objective to be included in the new Development Plan, as the proposed alteration to Policy CMP4 includes a requirement to ‘*Prepare Local Transport Plans based on the ABTA methodology in conjunction with the preparation of Local Area Plans, masterplans, Framework Plans and other large scale studies and plans as appropriate, in consultation with the NTA and TII and other relevant stakeholders.*’ Given the Blanchardstown Town Centre, and surrounding land to the south/south-west, is identified for a Framework Plan in the draft zoning map Sheet No. 13, there is a requirement for a Local Transport Plan to be prepared and therefore a separate specific objective is not necessary. Our client has engaged in an extensive consultation process with the Planning Authority in respect to the draft Urban Framework Plan (UFP) for Blanchardstown Town Centre, in order to provide a framework for the continued development / improvements of the Town Centre over the next 20/30 years and includes a Transport Study prepared in support of the draft UFP. The draft UFP considers in detail the proposed hierarchy of transport interventions promoting active travel and public transport in conjunction with potential development growth scenarios and includes a Transport Plan for the Town Centre linked to phased development potential. It is essential that any LTP for the Town Centre forms part of the UFP process as transport proposals are intrinsically linked to development scenarios.

In addition, whilst Objective CMO4 requires a Local Transport Plan for Balbriggan, this is a policy objective (RPO 8.6) in the RSES. The RSES is not specific in stating a Local Transport Plan is required for Blanchardstown Town Centre.

The following section of this document sets out the grounds of submission and supporting arguments for same in further detail, as they relate to specific proposed material alterations to the Draft Development Plan.

2.0 PROPOSED MATERIAL ALTERATIONS AND SUBMISSION REQUESTS

Proposed Material Alterations No. PA CH 4.1 and PA CH 4.5 Open Space Requirements

The Proposed Material Alteration PA CH 4.1 (see extract below) amends all references in respect of open space to a ‘*target minimum amount of 15%*’ and continues that ‘*except in cases where the developer can demonstrate that it is not possible, in which case the 12% to 15% range will apply.*’

PA CH 4.1: Update All references to open space in the Draft Plan

With respect to the provision of public open space, amend all references to ~~15%~~ to provide a range of **12 to 15%**.

Update this **(and all)** reference(s) to open space in the Plan (Ch. 3, Ch. 4 & Ch. 14) with the following text in bold: Target minimum amount of **15% (except in cases where the developer can demonstrate that this is not possible, in which case the 12% to 15% range will apply.)**

The Proposed Material Alteration no. PA CH 4.5 (see extract below) then updates all references in Section 4.5.2.3 of the Development Plan in respect of minimum open space requirement on infill/brownfield sites from 10% to 12%.

PA CH 4.5: Section 4.5.2.3 Quantity, page 168

Update all references in the development plan re: New residential development on infill/brownfield sites/town centre sites at 10%

To: ***New residential development on infill/brownfield sites/town centre sites at 12% Target minimum amount of 15% except in cases where the developer can demonstrate that this is not possible, in which case the 12% to 15% range will apply.***

It is not clear from a review of the Proposed Material Alterations document the reasons for increasing the minimum requirement from 10% to 12% for infill/brownfield sites, and it is unclear from the revised text if the target minimum of 15% will be sought in the first instance for infill/brownfield/town centre sites, with a reduction to 12% (if the 15% is not possible). This does not reflect the recommendations in the Chief Executive's Report on the Draft Development Plan which included recommendation no. CE CH 4.3 to amend all references to 15% to provide a range of 12-15%. There was no recommendation to change the minimum requirement of 10% for infill/brownfield sites. This was reflected in the Chief Executive's recommendation no. CE CH 4.5 which specifically referred to the continued 10% for infill/brownfield sites stating '**... 12-15 % of the site area in Greenfield sites/LAP lands and 10 % of infill and brownfield sites**'.

In the submission we made on the Draft Plan, our client welcomed in principle the minimum public open space requirement of 10% for brownfield/infill in accordance with national policy. However, the submission set out that a more concise / streamlined approach to open space was required, particularly for town centre and brownfield / infill sites. This would avoid confusion on the interpretation of how the relevant policies/objectives are implemented during the planning application process.

It is considered that the proposed alteration to require 12% open space (and potentially up to 15% depending on the interpretation of the alterations) on infill, brownfield and town centre sites is contrary to, and inconsistent with, national planning policy and S.28 Ministerial Guidelines.

National planning policy documents recommend providing a flexible approach to open space provision, in particular the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009). In particular the Guidelines state (Paragraph 4.19) that assessing open space requirements on a population basis can be difficult and case studies also indicate that '*where existing recreational facilities are available close to town and city centres, public open space provision on a strictly population basis is not appropriate. Apartment developments in particular, located in the inner city where bed space rates are normally high, will be unable to achieve public open space standards similar to suburban developments where bed space rates are considerably lower.*'

The Guidelines also state (Paragraph 4.20) that for '**large infill sites or brownfield sites public open space should generally be provided at a minimum rate of 10% of the total site area**' (*emphasis added*), and that it will be necessary for planning authorities to take a more flexible approach to quantitative open space standards and put greater emphasis on the qualitative standards. It acknowledges (Paragraph 4.21) that a relaxation in standards for town centre sites is appropriate, stating that '*where residential developments are close to the facilities of city and town centres or in proximity to public parks or coastal and other natural amenities, a relaxation of standards could be considered.*'

The National Planning Framework includes National Policy Objective 13 which outlines that planning standards should be flexibly applied in response to well-designed development

proposals that can achieve urban infill and brownfield development objectives, i.e. in order to deliver on compact growth objectives.

The Development Plans Guidelines for Planning Authorities (2022) is also clear in respect of public open space provision stating that *‘there should also be alternative approaches, which may include a more flexible application of standards to facilitate brownfield and infill development.’* There is no evidence the Planning Authority have considered these Guidelines in preparing the Proposed Material Alterations, other than brief reference in respect of Chapter 12 Implementation and Monitoring.

Overall, our client’s previous concerns still remain, and consider a clearer approach setting out the open space provision for greenfield, infill, brownfield and town centre sites would be welcomed and would help avoid ambiguity during the determination of planning applications. This is further compounded by the proposed material alterations and the requirement for 12% open space (and potentially up to 15% depending on the interpretation of the alterations) on infill, brownfield and town centre sites, which is contrary to, and inconsistent with, national planning policy, S. 28 Ministerial Guidelines. Section 28 of the Planning and Development Act 2000 (as amended) provides that in having regard to ministerial guidelines, planning authorities are required to consider the objectives and policies of such guidelines when preparing and making the draft development plan and the development plan.

Having regard to the above, we request that the following amendments to the Proposed Material Alteration to the Draft Plan be considered.

Submission Request 1 – Proposed Material Alteration No. PA CH 4.1 and PA CH 4.5 (Amended/additional text in green, omitted text shown in red with a strikethrough)

Having regard to the justification set out above, we respectfully request that the Planning Authority omit Proposed Alteration No. PA CH 4.5 from the plan, and reverts to the minimum requirement of 10% open space on infill, brownfield and town centre sites in accordance with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009).

~~New residential development on infill/brownfield sites/town centre sites at 12% Target minimum amount of 15% except in cases where the developer can demonstrate that this is not possible, in which case the 12% to 15% range will apply.)~~

Proposed Material Alterations No. PA CH 14.6 Monetary Value in Lieu of Play Facilities

The Proposed Material Alteration No. PA CH 14.6 (see extract below) proposes a new objective in respect of the monetary value in lieu of play facilities:

PA CH 14.6: Section 14.13.1 Hierarchy and Accessibility, page 551

Insert new objective after Objective DMSO50 (Permeable and Accessible Open Space), as follows:

Objective DMSOXX – Monetary Value in Lieu of Play Facilities
Require the monetary value in lieu of play facilities to be in line with the Fingal County Council Development Contribution Scheme.

It is considered this objective, combined with the draft Plan requirements on play facilities (objectives DMS070 and DMS071), represents a significant constraint particularly in respect of infill and brownfield development sites, and in particular where they are located in town

centre locations, which generally are more constrained (compared to a greenfield site) and are required to provide for a higher density residential development in accordance with national policy.

As part of the previous submission on the draft Plan, concerns were raised in respect of the prescriptive requirements in respect of playground facilities (objectives DMS070 and DMS071), which do not fully align with the children's play requirements for new apartment developments as outlined in the Apartment Guidelines 2020. The draft Plan Objective DMS070 requires that play facilities are provided at a rate of 4 sq.m per residential unit (applied to schemes in excess of 50 units). This reflects a continuation of the current objective in the Fingal Development Plan 2017-2023.

The Development Plans Guidelines for Planning Authorities (2022) is clear that '*A critical evaluation should be made of all of the non-mandatory objectives in the existing development plan, with a view to examining those which should be carried over to the new Draft Plan and those that may no longer be relevant. Planning authorities should be careful not to include historical objectives from one plan to the next, in circumstances where the content of the objective is no longer relevant or has been superseded by new legislation or planning guidelines in the subject area.*'

It is not evident this critical evaluation has been undertaken and it is considered the play facilities requirements is considered more relevant to a typical lower density housing scheme, rather than a higher density apartment scheme, as it greatly in excess of that required under the Apartment Guidelines 2020 and does not allow for any offset for those units that are unlikely to generate a demand for play provision (e.g. studios and 1 bed units are unlikely to generate a demand for play provision as they are unlikely to be occupied by households with children).

The Chief Executive Report states that '*The Apartment Guidelines 2020 do not provide for a specified rate of play provision making these guidelines difficult to apply in the context of Development Management.*' However, the Apartment Guidelines 2020 do include that provision for 85 to 100 sq.m of play space for the specific needs of toddlers and children up to the age of six for a scheme of 25 or more units with two or more bedrooms, and 200 to 400 sq.m of play space for older children and young teenagers in a scheme that includes 100 or more apartments with two or more bedrooms. This is considered the most applicable standard for higher density, town centre apartment schemes.

The Chief Executive's Report also states that new developments will be assessed in the context of FCC's document 'Space for Play, A Play Policy for Fingal' (2022) which provides for a standard level of play provision. However, this is a non-statutory document, and it is not clear how the objectives in respect of play facilities (including the proposed alterations in respect of requiring a financial contribution in lieu of these play facilities) has regard to and is consistent with the Apartment Guidelines 2020 which comprises the relevant Section 28 Guidelines.

It is respectfully submitted that the Planning Authority must balance the onerous overall play provision requirements, including the requirement for a contribution in lieu, against the merits of individual sites, in particular town centre sites. This accords with the Guidelines for Planning Authorities on Sustainable Residential Development in Urban Areas (2009) which do not provide specific requirements in respect of play facilities, and acknowledges a relaxation in standards for town centre sites, stating that '*Where residential developments are close to the facilities of city and town centres or in proximity to public parks or coastal and other natural amenities, a relaxation of standards could be considered.*'

Furthermore, reference is made in the proposed objective that the monetary value is ‘*to be in line with the Fingal County Council Development Contribution Scheme*’, however, the Fingal County Council Development Contribution Scheme 2021-2025 does not include for provision of a financial contribution in lieu of play facilities. Therefore, any contribution would need to be sought as a ‘Special Development Contribution’ and accord with the provisions of Section 48(2)(c) of the Planning and Development Act 2000 (as amended).

Having regard to the above, we request that the following amendments to the Proposed Material Alterations to the Draft Plan be considered.

Submission Request 2 – Proposed Material Alteration PA CH 14.6 (Amended/additional text in green, omitted text shown in red with a strikethrough)

Having regard to the justification set out above, there should not be a requirement for any financial contribution in lieu of playground facilities. We respectfully request that the Planning Authority omit Proposed Alteration No. PA CH 14.6 from the plan, and ensures that the requirement for play facilities for apartment developments is in accordance with national planning policy and S. 28 Ministerial Guidelines.

~~*Objective DMSOXX—Monetary Value in Lieu of Play Facilities
Require the monetary value in lieu of play facilities to be in line with the Fingal County Council Development Contribution Scheme.*~~

Proposed Material Alterations No. PA CH 6.8 Local Transport Plan

The Proposed Material Alteration No. PA CH 6.8, proposes to insert the following new objective after objective CM04 as follows:

PA CH 6.8: Section 6.5.4 Area Based Transport Assessment (ABTA), page 212

Include a new objective after objective CMO4 as follows:

*Objective CMOXX – Local Transport Plan
Prepare a Local Transport Plan for the Blanchardstown Centre, in consultation with the NTA and other relevant stakeholders.*

It is respectfully requested that the Proposed Material Alteration No. PA CH 6.8 requiring a Local Transport Plan for the ‘Blanchardstown Centre’ is omitted (we note in any instance that this should be referring to ‘Blanchardstown Town Centre’, as the shopping centre element of the Town Centre is better known as the Blanchardstown Centre), based on the rationale set out below.

It is not considered necessary for this objective to be included in the new Development Plan, as the proposed alteration to Policy CMP4 includes a requirement to ‘*Prepare Local Transport Plans based on the ABTA methodology in conjunction with the preparation of Local Area Plans, masterplans, Framework Plans and other large scale studies and plans as appropriate, in consultation with the NTA and TII and other relevant stakeholders.*’ Given the Blanchardstown Town Centre, and surrounding land to the south/south-west, is identified for a Framework Plan in the draft zoning map Sheet No. 13, there is a requirement for a Local Transport Plan to be prepared and therefore a separate specific objective is not necessary. This accords with the Development Plans Guidelines which states that objectives should be internally consistent, and careful consideration should be given to areas where policy may overlap.

Our client has engaged in an extensive consultation process with the Planning Authority in respect to the Draft Urban Framework Plan (UFP) for Blanchardstown Town Centre which seeks to provide a framework for the continued development and improvement of the Town Centre over the next 20/30 years and includes a Transport Study prepared in support of the draft UFP. The Draft UFP considers in detail the proposed hierarchy of transport interventions promoting active travel and public transport in conjunction with potential development growth scenarios and includes a Transport Plan for the Town Centre linked to phased development potential. It is essential that any LTP for the Town Centre forms part of the UFP process as transport proposals are intrinsically linked to development scenarios.

In addition, whilst Objective CMO4 requires a Local Transport Plan for Balbriggan, this is a policy objective (RPO 8.6) in accordance with the Eastern & Midland Regional Assembly Regional special and Economic Strategy (RSES). Whilst the RSES notes the preparation of Local Transport Plans is not limited to Balbriggan and the other settlements referred to, it is not specific in stating a Local Transport Plan is required for Blanchardstown Town Centre, and therefore Policy CMP4 is considered sufficient.

Having regard to the above, we request that the following amendments to the Proposed Material Alterations to the Draft Plan be considered.

Submission Request 3 – Proposed Material Alteration no. PA CH 6.8, (Amended/additional text in green, omitted text shown in red with a strikethrough)

Having regard to the justification set out above, we respectfully request the new objective proposed in PA CH 6.8 is omitted.

~~Objective CMOXX – Local Transport Plan
Prepare a Local Transport Plan for the Blanchardstown Centre, in consultation with the NTA and other relevant stakeholders.~~

3.0 CONCLUSION

This submission on the Proposed Material Alterations to the draft Fingal Development Plan 2023-2029 has been prepared on behalf of our client Blanche Retail Nominee Limited in relation to our client's lands at Blanchardstown Town Centre, Blanchardstown, Dublin 15.

The specific requests made in this submission are set out in the tables in Section 2 of this submission relating to the specific Proposed Material Alterations of the Draft Plan, to allow for ease of review and assessment.

We would be grateful if you consider the contents of this submission when considering the proposed material alterations to the Draft Fingal Development Plan 2023-2029.

Yours sincerely,



John Spain

Managing Director John Spain Associates Ltd.