

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

Date: 22/12/2022  
Our Ref: PT JN 18199

Dear Sir or Madam,

**RE: SUBMISSION ON THE PROPOSED MATERIAL ALTERATIONS TO THE DRAFT FINGAL COUNTY DEVELOPMENT PLAN 2023-2029 ON BEHALF OF MKN PROPERTIES LIMITED IN RESPECT OF THE CORE STRATEGY CHAPTER 2, PROPOSED MATERIAL AMENDMENTS**

## **1.0 INTRODUCTION**

On behalf of our client, MKN Properties Limited (MKN), 18 The Seapoint Building, 44/45 Clontarf Road, Dublin, we, John Spain Associates, 39 Fitzwilliam Place, Dublin 2, wish to make a submission in respect of the Proposed Material Alterations (PMA's) as they relate to the **Core Strategy** section of the Draft Fingal County Development Plan 2023-2029.

This submission relates solely to the Proposed Material Alterations to Chapter 2 of the Draft Development Plan dealing with the Core Strategy, and in particular the revised Population and Housing Demand figures contained in the amended Table 2.14. The key grounds of submission on the Proposed Material Alterations to the Draft Plan can be summarised as follows:

- It is respectfully submitted that in respect to Proposed Material Alterations PA CH 2.4, PA CH 2.5 and PA CH 2.6, a commitment by way of a new objective should be included that the Planning Authority will undertake a statutory variation/review of the population and housing demand projections contained in the Development Plan and Table 2.14 following the publication of the CSO Census 2022 figures.
- In relation to Proposed Material Alterations PA CH 2.4 and PA CH 2.5, It is respectfully requested that the population and housing demand figures contained in Table 2.14 (as altered by No. PA CH 2.14) are amended to fully account for the additional 20,000 population allocated to Swords by the Regional Assembly / in the Eastern and Midland RSES 2019 and in accordance with NPO68, and the actual demand for new housing based on existing and projected housing activity in the town.
- Respectfully requested that in respect of Material Alteration PA CH 2.5 and Objective CSOXX- Delivery of Housing, the clauses would be amended to permit flexibility to redistribute housing demand figures between settlements within the Metropolitan area.

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

## 2.0 PROPOSED MATERIAL ALTERATIONS AND SUBMISSION REQUESTS

### Proposed Material Alterations PA CH 2.3, PA CH 2.4, PA CH 2.5 and PA CH 2.6: Core Strategy and Projected Housing Demand

Proposed Material Alterations No. PA CH 2.3, PA CH 2.4, PA CH 2.5 and PA CH 2.6 relate to updated Table 2.14 in respect of the Core Strategy figures and the projected housing demand.

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

**Submission Request 1 – No. PA CH 2.3, No. PA CH 2.4, PA CH 2.5 and PA CH 2.6 (Amended/additional text in green, omitted text shown in red with a strikethrough)**

It is respectfully submitted that in respect to Proposed Material Alterations PA Ch 2.3 and PA CH 2.4, a commitment by way of a new objective should be included in the new Plan requiring the Planning Authority to undertake a statutory variation/review of the population and housing demand projections contained in the Development Plan and Table 2.14 following the publication of the CSO Census 2022 figures.

Further to the above, while we understand that overall housing target figures for the county must be consistent with the National Planning Framework and the Regional Spatial & Economic Strategy, the Council does have a considerable degree of discretion as to how the housing demand figures are distributed across the different settlements within the urban hierarchy. However, of major concern to our client is that in assessing demand, capacity and setting allocations to each of the main settlements in the county, full regard has not been had in the Proposed Material Alterations to national and regional planning policies of promoting compact urban growth within the existing built-up areas, with corresponding higher densities for defined central and/or accessible urban locations with proximity to high capacity/high frequency public transport services.

### Swords

In particular we would highlight the case of Swords Town, which is defined as a 'Key Town' within the Metropolitan Area of the County. As the Council will be aware, at a meeting of the Eastern & Midland Regional Assembly on the 10<sup>th</sup> July 2020, the Members formally passed a resolution to reallocate part (20%) of the projected population growth for Dublin city & suburbs to three defined Key Metropolitan Towns, including Swords, in accordance with

NPO68 and the Dublin Metropolitan Area Strategic Plan. The additional population allocated to Swords in this decision was 20,000 up to 2031.

This reflected the very significant planned public investment in public transport serving Swords, including in particular the MetroLink proposal, providing high capacity, high frequency accessibility to both Dublin Airport and Dublin City.

This additional population allocation to Swords, does not appear have been fully factored into the figures contained in amended Table 2.14 in the Proposed Material Alterations, and the population and housing figures for Swords are excessively low. We note that this issue was raised by the Office of the Planning Regulator in their submission on the Draft Fingal County Plan 2023-2029 when it stated:

*“Furthermore, the treatment of the additional population and corresponding housing supply target arising from the Dublin Metropolitan Area Strategic Plan (MASP) allocation under NPO 68 for Swords is also unclear. Section 2.2.7 states that an additional 20,000 population was allocated to Swords in accordance with NPO68 and the Dublin MASP. However, Table 2.14 provides for a population growth of just 10,265 over the plan period, and it is not clear how these growth rates are reconciled. The Office also advises that the NPO 68 additional population allocation is for the Key Town of Swords, and cannot be applied universally across the county. The allocation must also be applied in addition to the county HST allocation to Swords and clearly demonstrated within the core strategy table.”*

Accordingly, we respectfully request that the population allocation to Swords should be increased to fully reflect this in Table 2.14, with the commensurate increase in the housing demand figure to reflect this additional population, in order to ensure consistency with the RSES and MASP.

In addition to the point above, under the proposed amended Table 2.14 in the Proposed Material Alterations, the projected 2029 population for Swords has been reduced by 4,188 people from 64,453 to 60,265. No evidence base or justification has been provided in the Proposed Material Alterations as to why the population growth projected for the town has been so significantly reduced, which is contrary to Swords Key Town designation and the recommendations of the NPF and EMRA RSES. This reduction runs directly contrary to the additional 20,000 population allocation in accordance with NPO68 and the Dublin MASP.

The amended Table 2.14 has also introduced a new column headed ‘Projected Housing Demand’ and for Swords has allocated a total of 3,285 no. units over the six year period of the Plan. Again this does not provide for full consistency with national and regional policy for Swords, and does not reflect the strong ongoing demand for further housing in Swords, or its designation in the settlement hierarchy and strategic location.

In light of the foregoing, and having regard to the very significant investment in public transport infrastructure which is planned for Swords under the MetroLink and BusConnects, our client respectfully requests that the population and housing demand figures contained in Table 2.14 should be amended to account more fully for both the additional population allocated to Swords by the Regional Assembly, and the actual demand for new housing based on existing and projected housing activity in the town.

**Submission Request 2 – PA No. PA CH 2.3 and No. PA CH 2.14  
(Amended/additional text in green, omitted text shown in red with a strikethrough)**

It is respectfully requested that the population and housing demand figures contained in Table 2.14 (as altered by No. PA CH 2.14) are amended to more fully account for the additional 20,000 population allocated to Swords by the Regional Assembly and in accordance with NPO68, and the actual demand for new housing based on existing and projected housing activity in the town.

It is respectfully submitted that the proposed policies and objectives ( PACH2.5 & Objective CSOXX) designed to provide some flexibility to the Council do not go far enough to ensure that the overall housing targets for the County are met as some sites will come forward quicker than others while other sites may not be developed within the lifetime of the new Plan.

**Submission Request 3 – PA CH 2.5 and Objective CSOXX be amended by additional text in green**

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

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

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

*“Objective CSOXX – Delivery of Housing Units*


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

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

### **3.0 CONCLUSION**

We would be grateful if you would consider the contents of this submission when considering the proposed material alterations and incorporate the requested changes prior to the adoption of the Fingal County Development Plan 2023-2029.

Yours sincerely,



A handwritten signature in black ink that reads "John Spain Assoc." with a horizontal line underneath.

**John Spain**

*Managing Director John Spain Associates*