

Submission to Proposed Material Alterations of Fingal Development Plan 2023-2029

Prepared on behalf of lapetus LP

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1. Introduction

McCutcheon Halley Chartered Planning Consultants (MH Planning) have been appointed to prepare this submission on behalf of Iapetus LP (our client) in relation to the 'Balheary lands' at Newtown, Swords.

This submission is in response to the Proposed Material Alterations to the *Draft Fingal Development Plan 2023-2029*, and the *Errata to the Material Alteration Document* published on 11th November 2022 and 24th November 2022 respectively.

Our client welcomes the opportunity to participate in the plan making process which will inform future growth of the County and the delivery of homes in the lifetime of the plan and beyond.

A submission to the *Draft Fingal Development Plan 2023-2029* was previously made on behalf of our client.

1.1 Purpose of this Submission

The principal matters addressed in this submission relate to:

- Out of date Population Projections and the implications for housing targets in the Core Strategy
- Proposed Revisions to the ME zoning objective and Vision

This submission specifically relates to the Material Alterations set out under the following references;

- PA CH 2.3: Section 2.2 Core Strategy
- PA CH 2.4: Section 2.2 Core Strategy
- PA CH 3.10: Section 13.5 Zoning Objectives, Vision and Use Classes, page 472 and through the Draft Plan where relevant
- PA CH 3.11: Section 13.5 Zoning Objectives, Vision and Use Classes, page 472
- PA CH 3.12: Section 13.5 Zoning Objectives, Vision and Use Classes, page 472

It is referenced clearly in each section which of the above Material Alterations applies.

2. Subject Lands

The lands are located in the townland of Newtown which is approximately 2km north of Swords (Main Street), east of Magillstown Road and north and west of Balheary Road. Figure 1 below shows the subject lands in their context – the view is looking to the south-west – and also shows the proximity of the lands to existing residential and commercial development within Swords.

The lands which measure approximately 12.59ha (31.11 acres) are outlined in red in **Figure 1** below. The Balheary lands are currently in agricultural use, with access from the Magillstown Road at two points. There is some residential development in the form of one-off housing to the east of the site with additional housing development to the south-west. Balheary Golf Course lies north east of Magillstown Road opposite the subject lands.



Figure 1 – The Submission Site (Balheary Lands, Newtown) Outlined in Red.

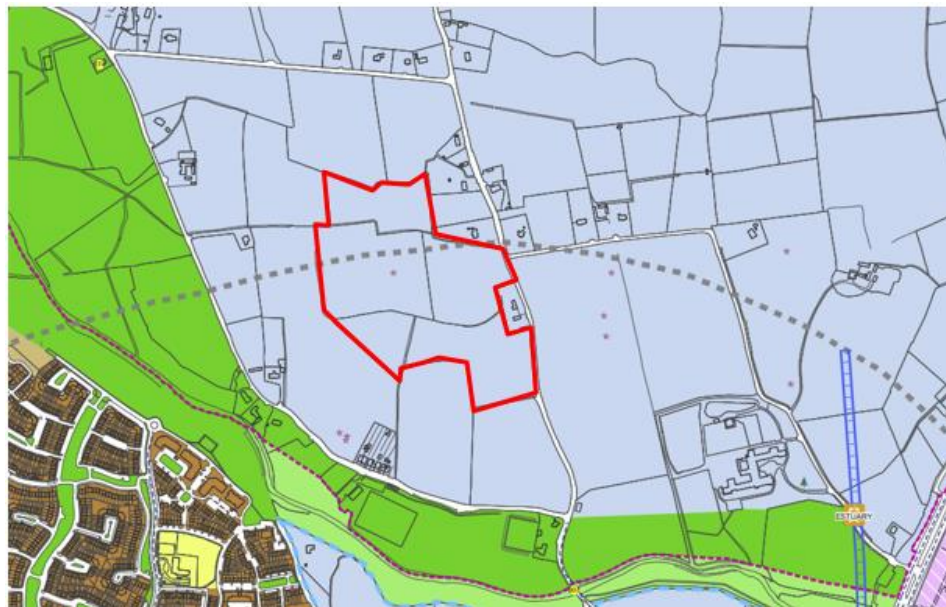


Figure 2. Draft Zoning Plan for Swords (Sheet No. 8 of the Draft FDP 2023-2029) with the location of the subject site shown

The subject lands are zoned Objective ME – Metro Economic Corridor under the Draft Fingal Development Plan 2023-2029. The ME zoning is a specific zoning objective which aims to:

“Facilitate opportunities for high-density mixed-use employment generating activity and commercial development and support the provision of an appropriate quantum of residential development within the Metro Economic Corridor”

3. Submission to Proposed Material Alterations

3.1 Introduction

For each element of this submission to the *Proposed Material Alterations*, the ‘Proposed Amendment’ reference number(s) as given in the *Proposed Material Alterations* document is stated.

3.2 Revisions to Core Strategy to align with Census Data

This submission is made in response to Proposed Amendment Reference No.’s:-

- **PA CH 2.3: Section 2.2 Core Strategy**
- **PA CH 2.4: Section 2.2 Core Strategy**

In the submission to the *Draft Fingal County Development Plan 2023-2029*, the housing and population targets set out in the Draft Plan relating to Swords as a Key Town were generally welcomed. It was outlined, in detail, how Swords was represented as a Key Town within the Core Strategy, and how this aligned with the planned growth under the RSES.

In Section 2.2.7 of the Draft Plan, it is stated that *‘In accordance with NPO 68, and as approved by the Eastern and Midland Regional Assembly, an **additional 20,000 population was allocated to Swords**’* for the period 2016-2031. This population allocation of 20,000 was not applied to Swords in Table 2.14, and this was picked up by the Office of the Planning Regulator (OPR), that there was a lack of correlation between the written statement and the figures in Table 2.14. The CE’s response was that following the submission of the OPR, alongside that of the Eastern and Midland Regional Assembly (EMRA), that a full investigation and re-examination of the population allocations and core strategy would take place.

The Proposed Material Alterations is now proposing a population growth of 6,077 persons for the period 2023-2029 (Core Strategy Table 2.14). This is a reduction of c40% from the estimated population growth figures outlined in the Draft Plan of 10,265 persons.

This reduction in estimated population growth does not align with the targets set in NPO 68 of the *National Planning Framework (NPF)*, the *Eastern and*

Midland Regional Authority Regional Spatial and Economic Strategy (RSES) or the Dublin MASP as set out in the RSES.

However, there is a fundamental problem relying on the data and population projections outlined in the NPF and the RSES. The NPF and RSES population targets are derived from the 2016 census of population and project a population of 5.7m nationally by 2040. The estimated national growth in population over the plan period is 19.7% or 0.82% per annum.

Notably, the period against which the NPF projections are based, 2011-2016, coincided with a severe economic downturn in the State leading to a significant under-estimation in population growth for the period up to 2040. The population growth estimates used in the NPF, and by extension the RSES, were prepared in 2017 when the economic recovery was still underway. This was prior to a return to full employment and net inward migration, and the ensuing increase in housing demand, had not been foreseen. Since 2017, housing demand has increased further, as the Irish economy has benefitted from a period of growth.

The implications of relying on out of date data, or being conservative with population forecasts, should not be underestimated. A recurrence of the current housing shortage, at a local or regional level, is more likely using conservative assumptions.

Population projections guide Development Plans to provide for the associated growth in demand for housing and services such as hospitals, schools, cultural and sporting facilities. The application of more realistic population projections would facilitate better infrastructure and service provision.

We are now at a critical juncture, with a confirmed growth in population that exceeds the ESRI projections which informed the NPF and in turn the Housing Need Demand Assessment and Core Strategy figures outlined in the Development Plan.

The preliminary results from the 2022 Census (June 2022) establishes the State's population at 5.12m. This represents 7.6% growth in the period 2016-2022 or 1.27% per annum (note the NPF and RSES population target is 0.82% per annum). Applying this annual growth rate to the 2016 baseline of 4.76m the estimated population of the State in 2040 is approximately 6.4m.

Thus, based on the most recent published data, the NPF population projection to 2040 is underestimated by c. 900,000. As the population projections set out in the Core Strategy of the Draft Fingal County Development Plan, and in the proposed Material Alterations to the Development Plan, are derived from the NPF and RSES projections, it follows that they too are well below the likely growth trajectory.

An examination of the current and emerging data from the 2022 Census (See Table 1 below) shows a significant increase in population growth rates in both Dublin and Fingal for the intercensal period 2016-2022, with 7.7% and 10.1% growth respectively. This compares to a national growth rate of 7.6%.

Locally growth rates from 2016 to 2022 and the percentage change for the relevant Electoral Divisions in Swords are set out in Table 3. It is notable that the population of the Swords-Lissenhall Electoral Division (ED), which includes our clients lands, has increased from 10,447 persons to 12,101 persons. This is a growth rate of 13.7%, nearly double the national growth rate.

Statistic	National	Dublin	Fingal
Population – 2016	4,761,865	1,347,359	296,020
Population – 2022	5,123,536	1,450,701	329,218
Actual change 2016-2022	361,671	103,342	33,198
Percentage change 2016-2022	7.6%	7.7%	10.1%

Table 1: Census 2022 results – Population and Actual Change¹

	Dublin	Fingal
ESRI Baseline Projections 2022	1,449,500	318,200
CSO Census Population 2022	1,450,701	329,218
Population Divergence (Actual v Projected)	1,201	11,018
Percentage Divergence	0.08%	3.35%

Table 2: Population Divergence: ESRI Projections v Census 2022

Electoral Division	Census 2016	Census 2022	% Growth Rate
Swords-Glasmore	7,711	7,710	0%
Swords-Forrest	15,153	15,790	4%
Swords-Lissenhall	10,447	12,101	13.7%
Swords-Seatown	7,003	7,489	6.5%
Swords-Village	2,674	2,707	1.2%

Table 3: Population Changes in Electoral Divisions

When the 2022 Census figures are analysed against the ESRI baselines projections (Table 2) used in the NPF population projections for the same year, there is a population divergence of +3.35%.

This means that the **current population of Fingal is c. 11,018 persons greater than the NPF projections for 2022**, the projections which have been used to guide the RSES and the core strategy of the Draft Development Plan / Material Alterations. Refer to Table 2. Relying on inaccurate and out of date evidence will lead to a flawed Development Plan that will misguide development in Fingal in a period of unprecedented demand for new homes.

¹ Source FP001 - Preliminary Actual and Percentage Change in Population 2016 – 2022 - <https://data.cso.ie/table/FP001> ; FP009 - Population and Actual and Percentage Change 2016 to 2022 - <https://data.cso.ie/table/FP009>

Extrapolating the 2022 Census data forward to 2026², with an annual growth rate of 3.35% based on the 2016-2022 intercensal period, this indicates an additional population of c.46,370 persons for Fingal (Table 4). Consequently, there is a requirement for c. 14,055 additional units above the current Housing Supply Target given in the FCDP (Table 4). This requirement for the additional dwellings is based upon an average household size of 3.03 persons, as used in the FCDP calculations.

By 2029, the projected population using the 2022 Census data is **54,938 persons more** than the population growth which the Draft Development Plan is based upon (Table 2.14 of the Draft Development Plan – Material Alterations). The proposed Development Plan needs to be adjusted to align these figures, and provide for an additional **18,131 housing units** to meet the requirements of its population (Table 5).

This requirement for an additional 18,131 no. dwellings is based upon an average household size of 3.03 persons, as used in the FCDP calculations. However, as Ireland’s household size converges towards the European average of 2.2 persons, **the number of additional dwellings required for the County could be c. 24,971 dwellings by 2029.**

Year	Census 2022	Census Extrapolation (+3.35% annually)	Population Difference
2022	329,218		
2023		340,236	
2024		351,634	
2025		363,414	
2026		375,588	+46,370
2027		388,170	
2028		401,174	+71,956
2029		414,613	+85,395

Table 4: Census 2022-2026 Population Projections

Year	ESRI Projections (CDP Projections)	Census Extrapolation	Population Difference	Housing Requirement
2026	327,000-333,000	375,587	42,587	14,055
2029	359,675 ³	414,613	54,938	18,131

Table 5: Housing Requirement above ESRI / MCDP Projections

The underestimate in the population projections has resulted in lower estimates for housing demand than are actually required presently and in the future and ultimately has consequences for the level of residential lands zoned in the development plan period. **The housing targets for the**

² 2026 was chosen to provide a direct comparison with the ESRI projection figures used in the NPF and RSES.

³ Estimated 2029 Population – Table 2.14 of the Fingal County Development Plan (Proposed Material Alterations).

County, including Swords, presented in the Core Strategy, are significantly lower than reality and do not accurately reflect current and future housing need. Should the period for Development Plans extend to 10 years, as is being reported in the media as part of the forthcoming Planning Bill, it is essential that Core Strategy projections and allocations are based upon robust data.

It is a further concern to our clients that the total units / potential yield of available residential land outlined in column 8 of Table 2.14 in the Proposed Material Alterations, has been effectively reduced by 40% due to the significant increase in extant permissions recorded in column 9 since the publication of the Draft Development Plan. As presented, the proposed amendment is providing for just 3,642 units during this plan period.

Requested Amendment #1:

Chapter 2

Table 2.14

It is recommended that Fingal County Council give consideration to amending Table 2.14 to reflect the 2022 census population figures and annual growth rates in the population projection figures, calculating the estimated 2029 population and projected housing demand units using the latest data available, thereby increasing the projected housing demand units and available residential land to better match the projected demand.

3.3 Objection to the proposed change to the ME Zoning Objective

This submission is made in response to Proposed Amendment Reference No.

- **PA CH 3.10: Section 13.5 Zoning Objectives, Vision and Use Classes, page 472 and through the Draft Plan where relevant**
- **PA CH 3.11: Section 13.5 Zoning Objectives, Vision and Use Classes, page 472**
- **PA CH 3.12: Section 13.5 Zoning Objectives, Vision and Use Classes, page 472**

The subject lands are zoned Objective ME – Metro Economic Corridor under the Draft Fingal Development Plan 2023-2029 (see Figure 1).

Our client has no objection to the proposed name change from ME – Metro Economic Corridor to “MRE” Metro and Rail Economic Corridor throughout the plan.

However our client would like **clarity** on the proposed changes to the ME zoning objective and ME zoning vision listed under PA CH3.11 and PA CH3.12 as follows:-

PA CH 3.11: Section 13.5 Zoning Objectives, Vision and Use Classes, page 472

“Amend the ME zoning objective as follows:

Facilitate opportunities for high-density mixed-use employment generating activity and commercial development and support the provision of an appropriate quantum of residential development ~~within the Metro Economic Corridor~~ adjacent to metro, rail and light rail stations.”

PA CH 3.12: Section 13.5 Zoning Objectives, Vision and Use Classes, page 472

“Amend the ME zoning vision as follows:

Provide for an area of compact, high intensity/density, employment generating activity with associated commercial and residential development which focuses on the MetroLink, rail and light rails stations within ~~a~~ settings of exemplary urban design, public realm streets and places, which are permeable, secure and within a high quality green landscape. Landmark buildings will provide strong quality architectural features, which respect and enhance the character of the area into which they sit. The designated areas will form sustainable districts which possess a high degree of connectivity and accessibility and will be developed in a phased manner subject to the necessary provision of social and physical infrastructure.”

The proposed amendment to the ME Zoning objective implies that residential development on ME / MRE zoned lands is required to be 'adjacent to metro, rail and light rail stations.'

The proposed amendment to the ME zoning vision however differs and it is considered more appropriately reflects the intended outcome for this land use zoning i.e. “associated commercial and residential development which focuses on the MetroLink, rail and light rails stations”. (our emphasis added).

These proposed amendments were introduced by the Elected Members, following a Motion during the Development Plan Meetings. They are not recommended alterations from the Chief Executive’s Report.

Our client is wholly opposed to any change which would require residential development solely adjacent to metro, rail and light rail stations.

This is a significant change from the Draft Development Plan and should be rejected on the following grounds:-

1. **Compact Growth:** As outlined in our submission to the Draft Development Plan, Compact growth is one of the **National Strategic Outcomes** (NSO 1) of the National Planning Framework. From an urban development perspective, this means:

“...we will need to deliver a greater proportion of residential development within existing built-up areas of our cities, towns and villages and ensuring that, when it comes to choosing a home, there are viable, attractive alternatives available to people.”

A recurring theme in the NPF is the requirement to ensure that the future growth of Dublin occurs within its Metropolitan limits. **Fingal County Council's functional area straddles the Dublin Metropolitan Area, including Dublin City and its suburbs and the area identified as the Core Region. Our clients lands form part of the Dublin city and suburbs boundary.**

- 2. Sequential Development:** The Dublin Metropolitan Area Strategic Plan (MASP), which includes our clients' lands at Balheary, seeks to deliver sustainable growth within the Metropolitan area. **The RSES supports a sequential approach to development, focusing on the densification and consolidation of sites within or contiguous to Dublin city and suburbs' existing built-up and zoned areas.** The subject lands are favourably located contiguous to the settlement of Swords, supporting compact growth and regional policy objectives concerning sequential development, compact growth, and the development of strategic residential development areas within or contiguous to the existing built-up areas in Dublin.
- 3. Projected Growth :** As outlined in Section 3.2 of this submission, the housing targets for the County, including Swords, presented in the Core Strategy, are based on out of date data. It has been demonstrated how the targets set for the County are significantly lower than reality and do not accurately reflect current and future housing need. The implications of relying on out of date data, or being conservative with population forecasts, should not be underestimated. A recurrence of the current housing shortage, at a local or regional level, is more likely using conservative assumptions.
- 4. Strategic Reserve:** The Balheary lands should be considered as a strategic reserve as they are a key location capable to facilitate compact growth, sequential patterns of development and housing supply in the short to medium term within Dublin City suburbs, in line with the national and regional policy objectives for the growth of the County.

On the basis of the above, the following Amendments are sought:-

Requested Amendment #2:

Reject the changes to **Section 13.5 Zoning Objective, page 472** proposed by the Elected Members and retain the wording as outlined in the Draft Development Plan as below.

The proposed amendment to the zoning class from ME to MRE is included. Text to be added in blue, text to be retained in blue underline.

“Facilitate opportunities for high-density mixed-use employment generating activity and commercial development and support the provision of an appropriate quantum of residential development within the Metro and Rail Economic Corridor. ~~adjacent to metro, rail and light rail stations.~~”

Requested Amendment #3:

Amend the proposed changes to **Section 13.5 Zoning Vision, page 472** proposed by the Elected Members to be consistent with the ME / MRE zoning objective as below.

Text to be added in blue, text to be retained in blue underline.

“Provide for an area of compact, high intensity/density, employment generating activity with associated commercial and residential development focused on lands within the Metro and Rail Economic Corridor ~~the MetroLink, rail and light rails stations~~ within a ~~a~~ settings of exemplary urban design, public realm streets and places, which are permeable, secure and within a high quality green landscape. Landmark buildings will provide strong quality architectural features, which respect and enhance the character of the area into which they sit. The designated areas will form sustainable districts which possess a high degree of connectivity and accessibility and will be developed in a phased manner subject to the necessary provision of social and physical infrastructure.”

4. Conclusion

As the fastest growing County in Ireland, it is incumbent that supply of new homes in Fingal during the life of the forthcoming Development Plan 2023-2029 keeps pace with demand and a policy approach that avoids caps and seeks to ensure pro-active management of challenges, where they arise.

Our client agrees with the Council's overarching policies and objectives outlined in the Draft Plan to accomplish the NPF's goals of compact growth near public transportation, the city centre, and the regeneration of underutilised brownfield sites and vacant sites as set out in the draft Core Strategy.

This Plan provides an opportunity for implementing a robust policy framework that focuses on the consolidation of Dublin and suburbs within its existing built-up footprint, primarily by directing projected growth and future residential development to strategic underutilised and vacant lands serviced by public transport following the objectives and policies of the NPF.

Our clients lands at Balheary offer significant development opportunities for Swords and the County, with sufficient land capable of delivering many of the

new homes that are targeted in Dublin city and suburbs within its existing built-up area, consistent with NPF's objectives and policy direction.

This submission seeks to achieve the following:

- a) Revisions to the Core Strategy to reflect the 2022 Census population figures in the population projections and housing targets for the County and specifically for Swords as the Key Town. This submission has outlined how the housing targets presented in the Core Strategy are based on out of date population projections from the NPF and RSES. These projections are significantly lower than reality and do not accurately reflect current or future housing need.

The implications of relying on out of date data should not be underestimated as this has a significant impact on planned services, facilities and housing stock. The Department has recently announced that a review of the NPF will be undertaken, and in the interim, the Council should consider updating their Core Strategy figures to reflect the Census 2022 results.

- b) The rejection of the amendments to the ME zoning objective and visions sought by the Elected Members, thereby retaining the status quo that residential development is not restricted to locations adjacent to metro / rail stations on the ME / MRE zoned lands.

We trust that our submission will be taken into account as part of the consultation process for the Draft Fingal Development Plan 2023-2029.

Our Client thanks you for the opportunity to engage with the Council in relation to the matters and recommendations made herein and trusts that due consideration will be given to the contents of this submission.