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Planning and Strategic Infrastructure Dept
Fingal County Council
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Customer Care Unit

11.40

22 DEC 2022

Fingal County Council

FINGAL COUNTY COUNCIL

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PLANNING REGISTRY

Re: Submission Regarding Proposed Material Alterations to the Fingal Draft Development Plan

Map Sheet 5: PA SH 5.7

I wish to submit some observations relating to a significant Material Alteration in the new Draft Development Plan, whereby as a result of the dismantlement of the current Holmpatrick Masterplan, the small residential component which was contingent on the ceding of a substantial land parcel to Fingal CC for use as public open space, is now being retained as regular RS zoned land despite its original provisional/conditional status. Taking account of this 'false' RS zoning arising arbitrarily from the imminent dissolution of the Masterplan, and in recognition of the exceptional coastal landscape, the CEO rightly recommended that the 2.98 hectares be zoned as High Amenity (HA) [See CE SH 5.1] in the forthcoming CDP. It stands to reason that once a Masterplan is dissolved there is no onus to retain any of the original zonings, which were designed in symbiosis – as parts of a functioning whole rather than as categorical entities *per se*. Isolated from the rest of the Masterplan, the RS component has lost its value. Yet when the motion to rezone the RS component as High Amenity (HA) came before the Council sitting (Motion 410 in conjunction with Motions 432, 433, 435 pertaining to other portions of the Masterplan), the proceedings were conducted without reference to the current mixed zoning context dictated by the Masterplan. The impression was conveyed that this particular site (the most prominent portion of a swathe of land designated "sensitive" in the current CDP) was, due to its nominal (indeed virtual) "RS zoning", indispensable to the housing development targets of Skerries town as precipitated by the national housing crisis. The motion (available online) was presented by the local councillors as a case of de-zoning orthodox RS-zoned lands rather than a matter of viably reconstituting lands freed from a soon to be obsolete masterplan.

There is no material need to zone scenic coastal lands for residential development. It is evident from the statistics in the "*Fingal Settlement Hierarchy*" in the current CDP that Fingal has an excess of RS zoned lands: supply well exceeds demand.

The surplus of RS-zoned lands in Fingal is acknowledged in the submission from the OPR to the Draft Development Plan (p. 12) which recommends prioritisation:

"Having regard to the population growth and housing supply targets for the plan period, it will be necessary for the planning authority to prioritise those

serviced/serviceable lands that will support a sustainable, integrated approach to spatial and transport planning consistent with the objectives of the NPF and RSES". (emphasis added)

A strict correlation between population growth and housing supply/density is required through "a justified settlement hierarchy".

The illuminating OPR submission continues:

"It will also be critical for the plan to ensure that the translation of population and housing growth on the ground through proposed land use zonings is consistent with the national and regional objectives for compact growth and to Ministerial guidelines on housing density. In this regard the capacity of remaining undeveloped land zoned for residential uses under the existing development plan (table 2.2) appears to be considerable and should be reviewed and prioritised to align with growth targets setting out a clear strategy for the plan period and beyond.(emphasis added) ...

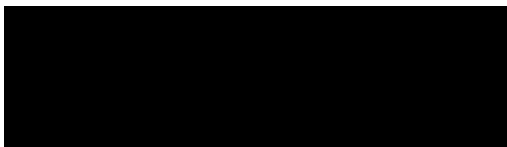
It will be particularly important for the core strategy to prioritise the sequential development of serviced or serviceable lands in accordance with the tiered approach to zoning (NPO72 a, b and c refer), favourably located relative to quality public transport corridors, as identified in the RSES (Table 5.1 Strategic Development Areas and Corridors)".

All this militates against the retention of the RS zoning in Holmpatrick. It is not consistent with national and regional objectives for compact growth. The proposed Material Alteration whereby the Masterplan land retains its redundant RS component contravenes policy in the NPF and the RSES which require emphasis be placed on renewing and developing existing settlements instead of ramifying into the countryside. The zoning does not comply with sequential development and if measured in terms of its potential priority value in a hierarchy of residential sites would rate very low. It is clear that retaining the RS zoning at Holmpatrick is contrary to proper planning and sustainable development.

Retaining the RS zoning at Holmpatrick also brings the draft CDP into conflict with objectives relating to European Natura 2000 sites, NHAs, and SPAs.

In my view the wrongness of the proposed zoning for the Holmpatrick Masterplan is such as to bring the new Development Plan into disrepute. I would respectfully ask the Planning Team to reconsider following the Chief Executive's prudent and far-sighted recommendation to rezone the RS component as HA, before setting the final draft in stone.

Yours Sincerely,
Mary Horan



Phone:

