

Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

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Draft Fingal County Development Plan 2023-2029

The Eastern and Midland Regional Assembly notes the publication of the Draft Fingal County Development Plan 2023-2029 and sets out hereunder submissions and observations on behalf of the Assembly. This submission has been prepared by the executive and approved by the members of the Eastern and Midland Regional Assembly at the meeting of 8th April 2022.

Regional Spatial and Economic Strategy (RSES)

As indicated in the Assembly's previous submission to the County Development Plan review process made under Section 27A of the Planning and Development Act 2000, as amended, The Council will be aware of the finalisation of the Regional Spatial and Economic Strategy for the Eastern and Midland Region, made on 28th June 2019, which consequently initiated the statutory time period within which the Council are required to prepare their Draft Development Plan, as stated at Section 11(1) (b) of the Planning and Development Act 2000, as amended (the Act). In this regard, The Assembly welcomes the publication of the Draft Fingal County Development Plan which enables the coordinated and timely incorporation of Project Ireland 2040 - the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES), thus ensuring full alignment between local, regional and national planning policy.

Legislative Context

As required by Section 27B of the Act, The Eastern and Midland Regional Assembly has prepared this submission, and sent a copy of same to the Minister and Office of the Planning Regulator.

In accordance with the aforementioned Act, a submission shall contain a report which shall state whether, in the opinion of the Regional Assembly, the draft development plan, and in particular its core strategy are consistent with the Regional Spatial and Economic Strategy. If, in the opinion of the Regional Assembly the draft development plan, and its core strategy are not consistent with the RSES, the submission / observations and report shall include recommendations as to what amendments, in the opinion of the Regional Assembly, are required to ensure that they are consistent.

This report contains the opinion of the Eastern and Midland Regional Assembly in relation to the above matters along with recommendations as required under Section 27B of the Act.

The attention of the Council is also directed to the requirements of Section 12 (4) of the Act, whereby a Chief Executive's Report prepared by the Planning Authority shall summarise the issues and recommendations raised by the Eastern and Midland Regional Assembly, and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the development plan.

Submission

The Assembly would like to acknowledge the extensive work that the Local Authority has carried out in order to prepare the Draft Plan and, in particular, that this work follows a period of considerable change, within a planning policy context, that included the publication of the National Planning Framework (NPF), the RSES and the establishment of the Office of the Planning Regulator. The Assembly acknowledges the effort of the Council to consult with the public as part of the plan process, including the online webinar and series of drop-in sessions. Accordingly, the Assembly welcomes the overall approach and effort of Fingal County Council to coordinate and incorporate policies and objectives, so that they are consistent with the RSES and NPF.

The Assembly considers that the overall draft development plan, including its Core Strategy, are generally consistent with the RSES subject to the contents of the remainder of this submission. The submission broadly follows the chapter headings of the Draft Development Plan, under the following headings:

1. Introduction, Vision and Strategic Overview
2. Planning for Growth: Core Strategy and Settlement Strategy
3. Sustainable Placemaking and Quality Homes
4. Community Infrastructure and Open Space
5. Climate Action
6. Connectivity and Movement
7. Employment and Economy
8. Dublin Airport
9. Green Infrastructure and Natural Heritage
10. Heritage, Culture and Arts
11. Infrastructure and Utilities
12. Other
13. SEA, AA and SFRA

1.0 Introduction, Vision and Strategic Overview

The Assembly welcomes the inclusion of the first chapter of the Draft Plan, which provides an overview of scene setting matters including the Strategic Vision, Strategic Objectives, the Policy Context and Socio-Economic Profile.

The indication that the three cross cutting principles of the RSES, namely healthy placemaking, climate action and economic opportunity, will be incorporated into all facets of the new Development Plan is considered to enhance the plan and its consistency with the RSES.

Specific references to the Dublin Metropolitan Strategic Plan (MASP), Swords' designation and importance as a Key Town, and the Dublin-Belfast Economic Corridor are positive additions in contextualising this plan review.

It is considered that this section of the Draft Plan could be strengthened through emphasising the legislative context and planning policy hierarchy including a clear indication that the Fingal County Development Plan is required to be consistent with the RSES for the Eastern and Midland Region.

2.0 Planning for Growth; Core Strategy and Settlement Strategy

The Assembly acknowledges the work that has gone into the preparation of Chapter 2 which details the Core Strategy and Settlement Strategy of the Plan.

As part of this, the Assembly welcomes that this chapter sets the overarching framework which will set in place a strategy to guide the future and sustainable development of Fingal over the life of this Plan and beyond.

2.1 Statutory Requirements

Fingal County Council are reminded of their obligations to prepare a Core Strategy in accordance with the provisions of Section 10 of the Act. Relating specifically to this chapter of the Draft Plan, the Assembly draws the attention of the Council to the contents of Section 10 (2A), (2B) and (2C) of the Act and asks Fingal County Council to ensure consistency in this regard.

2.2 Core Strategy: Population and Housing

2.2.1 Population Allocation

Section 2.2.7 documents the population projections for the County over the plan period. In setting out these projections, it is noted that the plan presents the population allocation in line with a) the RSES, b) the addition of 25% headroom in accordance with the NPF Roadmap that allows scope for headroom, not exceeding 25%, to be considered to 2026 in those counties where projected population growth is projected to be at or above the national average baseline including Fingal County Council, and c) National Policy Objective (NPO) 68 of the NPF which enables up to 20% of the phased population growth targeted in the principal city and suburban area, to be accommodated in the wider metropolitan area i.e. outside the city and suburbs or contiguous zoned area, in addition to growth identified for the Metropolitan area. This resulted in an additional 20,000 population allocation for the Key Town of Swords.

Table 2.4 should be renamed to take into account that the figures presented are both adjusted to apply headroom and comply with NPO 68 of the NPF. At Table 2.5, the reference to 'RESE' should be revised to 'RSES'.

Whilst the Assembly acknowledges that the figures as presented appear to be in keeping with the RSES and notwithstanding the indication that 'figures have been used to extrapolate figures aligning with the plan period', it is not clear how the overall figure of 359, 290, as presented in Table 2.5, has been arrived at and how the additional population allocation for Swords has been taken into account during the plan period. It is therefore recommended that the Draft Plan be altered to provide further explanation in this regard.

2.2.2 Housing Supply

The Draft Plan outlines that during the period of the last County Development Plan, approximately 9,960 housing units were developed, as per the Dublin Housing Taskforce (DHTF) returns. It is also noted that the Draft Plan indicated that as of Q2 2021, there were 14,130 residential units with extant permissions across the County and there were a further 3,077 proposed residential units pending a planning decision.

In calculating housing supply for the plan period, the Assembly welcomes the application of the methodology outlined in Housing Supply Target Methodology for Development Planning Guidelines, issued in December 2020 under Section 28 of the Planning and Development Act, 2000 (as amended).

Using this methodology, the stated housing demand for the years 2023 to 2029 (the relevant development plan period) is approximately 16,245 residential units for the six-year period. This figure includes the addition of estimated homeless figures to this residential need.

2.3 Land Capacity and Core Strategy Table

It is noted that the Draft Development Plan outlines that there are approximately 1,250 hectares available to develop during this development plan cycle which can provide approximately 41,500 residential units, including the strategic land banks at Lissenhall and Dunsink. As outlined in the Draft Plan, this demonstrates that Fingal County Council has excess capacity to accommodate the required need of 16,245 residential units over the plan period within its administrative area.

In addition to the above figures, Table 2.10 of the Draft Plan indicates that there is 1115 ha of zoned land available which will accommodate 35,204 residential units. The Draft Plan goes on to state that “excluding those lands identified for strategic long-term development within Lissenhall in Swords, the analysis estimates a potential for 28,204 units on 889 hectares of developable land within the lifetime of the Development Plan period. Zoned land with extant permission not commenced (circa 6,400 units) has been recognised”.

The Assembly notes that the lands at Lissenhall and Dunsink are included only as potential lands and that these two large tracts of land are currently proposed for new urban neighbourhoods beyond the 6-year lifetime of the Draft Plan. The Dunsink Feasibility Study is a welcome development in this regard. In line with the Draft Development Plan Guidelines, August 2021, the Local Authority may consider that these lands are identified as ‘Long-Term Strategic and Sustainable Development Sites’ given that they are not likely to be developed within the plan period, reflecting that they will deliver housing within subsequent plan periods (i.e., more than 6 years). It is also recommended that accompanying zoning maps ensure that this is reflected.

The Assembly notes the statement within the Draft Plan that while the County has an excess of zoned land than that required to deliver the supply targets, this is considered necessary to facilitate a choice in sites that come forward recognising that not all sites may be available within the plan period.

Notwithstanding the above point, it is noted that the Draft Development Plan Guidelines published in August 2021 indicate that, ‘Should it be the case that there is a surplus of well-located zoned and fully serviced land to meet population and housing supply targets already zoned for development in any local authority area when reviewing a development plan, it is recommended that a phased approach be taken to prioritise and rank the preferred sequence of development of such sites.’ Furthermore, Section 4.4.3 of these aforementioned Guidelines outlines that any such additional provision must not exceed 20-25% of the required quantum of zoned land for the plan period.

In light of the above, the Regional Assembly recommend that the Core Strategy contained within the Draft County Development Plan be revised to take account of the population targets outlined within the RSES and the Housing Supply Targets calculated in accordance with the Housing Supply Target Methodology for Development Planning Guidelines, issued in December 2020 under Section 28 of the Planning and Development Act, 2000 (as amended).

As part of this, you are requested to demonstrate how extant planning permissions have been taken into account in determining the quantum of zoned land that is now required and in particular provide

clarity around the stated figure of 14,130 residential units with extant permissions across the County and the further 3,077 proposed residential units pending a planning decision, have been factored into the Core Strategy, notwithstanding the indication that zoned land with extant permission not commenced (circa 6,400 units) has been recognised. Furthermore, how the proportion of projected housing need to be met on unzoned land in rural areas has been considered.

In addition to the above, and in line with the requirements of page six of NPF Roadmap, the Local Authority is also asked to demonstrate how specific consideration of infill/ brownfield and greenfield capacity has been included within the Core Strategy in order to ensure compliance with RPO 3.2 of the RSES and National Policy Objectives 3b and 3c of the NPF which relate to compact growth.

Whilst the Assembly acknowledges the presentation of the Core Strategy table and Settlement Strategy at Section 2.7 of the Draft Plan, it is noted that the Settlements within Dublin City and Suburbs have been grouped, with no differentiation provided for same. In line with Section 1.3.2 of the Draft Development Plan Guidelines for Planning Authorities issued in August 2021, it is acknowledged that in the cities there will be a well understood structure of ‘major town centres’, ‘district centres and ‘urban villages’ and while the distinction between the ‘core’ and ‘periphery’ will be important considerations in targeting growth, there may not be the same discrete hierarchy of settlements as can be found in other counties. Notwithstanding this, the Guidelines outline a ‘Differentiated approach to Core Strategy Tables’ including a Core Strategy Table approach for the Cities which should be followed by planning authorities to outline the allocation of housing and population. Accordingly, it is recommended that the Core Strategy Table and Settlement Strategy is updated in line with the aforementioned Guidelines that seeks to identify, and provide robust estimates, for each relevant area identified for growth within the Dublin City and Suburbs category and to also make estimates for residual infill development potential.

The Assembly considers that the Core Strategy Table should include reference to residential densities that reflect Fingal’s role as outlined in national and regional policy, and which are consistent with key national and regional strategic outcomes focused on sustainable settlement patterns and compact growth. Planning Guidelines that relate include the Sustainable Residential Development in Urban Areas (the ‘Sustainable Residential Development Guidelines’), issued in 2009, the Sustainable Urban Housing: Design Standards for New Apartments (the ‘Apartment Guidelines’) issued in 2020, and the Urban Development and Building Heights Guidelines for Planning Authorities (the ‘Building Height Guidelines’), issued in 2018.

2.4 Tiered Approach and Phasing

The Assembly welcomes the inclusion within the Draft Plan of the reference to the requirement under NPO 72a, for a local authority to differentiate between zoned lands that are serviced and zoned lands that are serviceable within the life of a development plan. The Assembly notes the indication within the Draft Plan that Fingal County Council is exceptional in that the entire plan area is serviced and no fundamental constraints were identified by Irish Water. It is further noted that the Draft Plan states there may be local infrastructural needs and upgrades needed for certain sites, but that all lands within the County are serviced and are connected to the public water systems. In addition, it is stated that almost all lands are located proximate to existing and planned public transport corridors and an extensive network of pedestrian and cycle routes are underway.

Whilst the Assembly notes the above and the contents of Appendix 4 of the Draft Plan, it is recommended that the Local Authority provide a Tiered Approach to Zoning in line with the requirements of NPOs 72a, b and c of the NPF, for all of the targeted development lands identified as

part of the Draft Plan. This tiered approach will differentiate between zoned land that is serviced and zoned land that is serviceable within the life of the plan and detail an estimate of the full cost of delivery of the specified services. It is considered that this tiered approach will facilitate the prioritisation of development lands within the Local Authority. As part of this prioritisation, the Local Authority should consult with Section 3.1 of the RSES which details an asset-based approach in order to determine an overall growth strategy and settlement hierarchy.

2.5 Housing Strategy and Housing Need Demand Assessment (HNDA)

The Assembly welcomes the inclusion of the Housing Strategy that incorporates a Housing Need Demand Assessment (HNDA) as summarised at Section 2.3.3 of the Draft Plan. It is noted that Fingal County Council has undertaken a HNDA, as part of the Housing Strategy, in accordance with National Policy Objective (NPO) 37 and Regional Policy Objective (RPO) 9.5, using the HNDA Toolkit Methodology.

2.6 Implementation and Active Land Management

The Assembly welcomes the Implementation and Active Land Management section of the Draft Plan to ensure that development potential is realised through mechanisms and initiatives that includes central and other funding opportunities. It is noted that Fingal County Council employ a number of policy responses to facilitate development, including Local Area Plans, Masterplans and Framework Plans. Whilst the Assembly welcome the approach of Fingal in trying to ensure plan led development, it is recommended that the Local Authority consider reducing the number of non-statutory policy frameworks proposed. In addition, the use of non-statutory plans (including masterplans and framework plans) as a means to determine and coordinate development in the County, should be reconsidered, particularly given the non-statutory role of any related public consultation and role for the elected members in the formulation of same.

2.7 Employment Lands and Retail

The inclusion of dedicated sections on employment lands and retail development, within the Core Strategy Chapter, are considered positive additions to the Draft Plan. The Assembly welcomes the indication that the employment strategy is informed by an evidence-based approach which considers both existing land use zoning for employment purposes, and the requirement for additional employment lands based on population and employment growth assumptions. It is noted that in order to inform the delivery of employment, Fingal County Council commissioned a study of available lands which have potential to generate jobs. It is noted that this analysis indicates the importance of the larger key settlements such as the Consolidated Metropolitan Area, Swords, Portmarnock, Balbriggan and Malahide in relation to the scale of economic growth and employment pull.

Notwithstanding the inclusion of Policy CSP 11 and Objectives CSO 11-14 of the Draft Plan, it is recommended that the policy provision of the Draft Plan is strengthened to explicitly support the provisions of the RSES and the finalised Core Strategy in order to align population, employment and housing growth, as identified within the growth enablers for the Region at Section 4.3 of the RSES.

In addition to the above, having regard to the contents of the Fingal Economic and Employment Land Use Study contained within the Draft Plan, and the Map Sheets provided as part of the Draft Plan, it is not clear from the information presented if the quantum of land provided for economic development is in keeping with the overall Core Strategy or levels of growth under the RSES. This includes, for instance, lands identified as 'ME- Metro Economic Corridor' 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. In light of this, it is recommended that the Local Authority give consideration to the provision of a more robust justification for the quantum of lands zoned for employment purposes, and in particular the sustainability of these lands zoned having regard to Table 3.1 of the RSES, and in particular the ability of the lands to have access to adequate connectivity and infrastructure within the plan period.

It is recommended that already zoned lands with good public transport links and scope for intensification of employment uses be identified in the Plan and that appropriate zonings and objectives be applied to encourage developments at these locations at appropriate densities. This is in keeping with RPO 4.3 which supports the consolidation and re-intensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin City and suburbs, and the Guiding Principles for Growth in the Dublin Metropolitan Area (section 5.3 of the RSES) which requires increased employment density in the right places.

2.8 Settlement Strategy

The Assembly notes Section 2.7 of the Draft Plan which details the Settlement Strategy for Fingal. As part of this the Assembly welcomes the indication that the future growth of Fingal must align with the NPF and the RSES. It is noted that the Settlement Hierarchy for Fingal has been developed in accordance with the guiding principles established under the NPF, RSES (including MASP). The Settlement Hierarchy aligns with the Core Strategy and is informed by the Housing Strategy and HNDA.

The Assembly welcomes Policy CSP12 which promotes compact growth through infill/ brownfield development, a focus on the County's designated Strategic Development Areas as identified within the Dublin Metropolitan Area Strategic Plan (MASP) and the promotion of increased densities along public transport corridors. It is considered that this is in keeping with RSO 2, RPO 3.2 and 3.3 of the RSES, and reinforces the Guiding Principles for the sustainable development of the Dublin Metropolitan Area as outlined within the Dublin MASP at Section 5.3 of the RSES.

2.9 Core Strategy Policies and Objectives- Swords Key Town

The Assembly notes the inclusion of a number of policy and objectives that form part of the Core Strategy Chapter. This includes a number of policies and objectives related to the Metropolitan Key Town of Swords. Whilst alignment with the RSES is noted in this regard, the Local Authority are directed to Regional Planning Objectives (RPOS) 4.28 to 4.32 of the RSES that relate to specifically to Swords, in order to ensure consistency with same as part of the County Development Plan.

3.0 Sustainable Placemaking and Quality Homes

The overall purpose of this Chapter which is to set out the strategy to guide successful placemaking and ensure quality housing within Fingal, is welcome by the Assembly. The assembly support that the Chapter is underpinned by the concept of 'Healthy Placemaking', which is a Key Principle of the RSES. Reference to related Regional Policy Objectives (RPOs) 9.10- 9.13 and the inclusion of Figure 9.2 of the RSES, are positive additions to the Draft Plan in this regard.

3.1 Housing Supply

As part of this Chapter, the Assembly notes the policies and objectives centred on the Core Strategy, housing growth and ensuring housing supply. This includes policies and objectives focused on compact growth, consolidated residential development, the Housing Strategy, the provision of enabling infrastructure and co-operating with stakeholders to respond to the current housing supply challenges

within the Dublin Region. It is also noted that the Council will support 'Active Land Management' using appropriate exchequer funding to ensure the delivery of accessible social and affordable housing in a variety of size and tenure across Fingal County Council lands alongside open space, community and/or educational facilities, where required.

Relating to housing type and tenure, it is noted that policies SPQHP28- 32 relates. In line with the comments contained at Sections 2.0 of this submission, and in order to strengthen the Draft Plan, it is recommended that Fingal County Council give consideration to the inclusion, of a clearly presented summary of the entire housing need in Fingal, which includes the housing need broken down across tenures, what is required in terms of new housing supply and why this is the case, including social and affordable needs, housing types and sizes. This will present a clear and concise guide as to what is required to successfully deliver the housing requirement for the County over the plan period.

3.2 Housing in Rural Fingal

The Assembly notes the inclusion of a dedicated rural housing section at section 3.5.15 of the Draft Plan. It is indicated that Fingal's Rural Housing Strategy seeks to achieve a balance in terms of promoting sustainable rural development while also ensuring the protection of Fingal's rich rural heritage, its landscapes and countryside, in line with national and regional policy.

The Assembly also consider the inclusion of objective SPQH057, which supports the 'Serviced Site Initiative', as a positive addition to the Plan. This is in keeping with RPO 4.78 which states that "Development plans should support the development of a 'New Homes in Small Towns and Villages' initiative which would augment the delivery of actions by local authorities, Irish Water, communities and other stakeholders in the provision of services and serviced sites to create 'build your own home' opportunities within the existing footprint of rural settlements to provide new homes to meet housing demand."

Included as part of this section of the chapter, is criteria detailing the requirement for housing in the open countryside. It is recommended that prior to the finalisation of the Draft Plan, the Council ensure that related policy in this regard is consistent with RPOs 4.80 and 4.81, NPO 19 of the NPF and the content of Circular Letter PL 2/2017 "Sustainable Rural Housing Guidelines for Planning Authorities 2005 – Local Needs Criteria in Development Plans."

In keeping with the comments at Section 2.3 of this submission, it should be noted that the NPF requires that development plans quantify the demand for single housing in the countryside with National Policy Objective 20 outlining the requirement to '*Project the need for single housing in the countryside through the local authority's overall Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes.*' This requirement is also specified at Section 10 (2A) of the Planning and Development Act 2000, as amended, and within the Draft Development Plan Guidelines published in August 2021. In this regard, it is recommended that the Council include the provision of same as part of the Plan.

4.0 Community Infrastructure and Open Space

The Assembly welcomes this dedicated chapter to community infrastructure and open space emphasising that provision and access to these are central to our health and wellbeing and contribute to healthy placemaking which is a key ambition of the development plan aligning with National and Regional Policy objectives. This chapter sets out the policy context by which community infrastructure and open space is guided.

The Plan recognises that National and Regional guidance focuses on compact growth and the need for urban and village centres to provide the focus for a wide range of activities, contributing to a sense of place and identity, which aligns with RPO 9.14 of the RSES. It is welcomed that the Council will continue to provide community infrastructure to meet the demands of the County's increasing population and will build on significant investment in Fingal's social infrastructure, including the provision and expansion of services such as healthcare, education, community facilities, libraries, recreational facilities, public parks, heritage restoration projects and playgrounds.

It is also welcomed that in order to mitigate and reduce the effects of climate change, the Council will continue to ensure the provision of community infrastructure and open space at locations which are accessible by active travel, including walking or cycling and which are close to transport routes. The Assembly further welcomes Objective CIOS013 to promote public health policy including Healthy Ireland and the National Physical Activity Plan in line with NPO 26 of the NPF and RPO 9.16 of the RSES.

This chapter also has a comprehensive section dedicated to high quality open space provision which is to be guided by five principles of Hierarchy, Accessibility, Quantity, Quality and Private Open Space. In addition, Council policy in this area highlights the importance of trees, SUDs, allotments, community gardens and community initiatives which are to be welcomed.

5.0 Climate Action

The Assembly welcomes the inclusion in the Draft Plan of a dedicated Chapter relating to Climate Action which incorporates specific Climate Action polices (CAP1, CAP2, CAP3) to support the implementation of national objectives on climate change, to prioritise measures to address climate change through effective mitigation and adaptation responses, and promotion of sustainable settlement and transport strategies in line with National and Regional policy. The Assembly further welcomes the Council's commitment to climate action through Objective CA01 to implement Fingal County Council's 2019 Climate Change Action Plan 2019–2024 in consultation and partnership with stakeholders including the Dublin Metropolitan Climate Action Regional Office (CARO) and Codema. Table 5.1 of the Plan sets out a holistic and integrated approach in demonstrating how each of the Chapters in the Draft Plan contribute to Climate Change Adaptation or Mitigation, and further observations in this regard are set out in the following sections.

The Assembly welcomes the Council's adoption of the Fingal County Council's Climate Change Action Plan, 2019 - 2024 (CCAP) concentrating on five key areas Energy and Buildings, Transport, Flood Resilience, Nature-Based Solutions and Resource Management. It is acknowledged that the county development plan will play an important role in implementation with a focus on evidence-based and spatially appropriate policies and objectives to help address mitigation and adaptation requirements and move towards a low-carbon, resilient County.

It is noted that the Draft Plan refers to the Government's Climate Action Plan 2019 and related Policy CAP1. All references should be updated to reflect the new Climate Action Plan 2021 (CAP21) and the associated annex of actions should be reviewed as they relate to local authorities and sectoral emissions reduction targets. In particular, national targets propose to increase the proportion of renewable electricity generation to up to 80% as expressed in CAP21. The final plan should also make reference to the actions proposed under the recent CAP21 including those related to Local Authority Renewable Energy Strategies and the upcoming revised Wind Energy Guidelines due for publication in 2023. The Plan also refers to the Offshore Renewable Energy Development Plan (OREDPP) 2014 and the Council is directed to its current review as OREDPP II is due to be completed and published later this year.

The Draft Plan states that Codema are preparing a 'Dublin Region Energy Master Plan' for Dublin Local Authorities that will develop evidence based and costed pathways for the Dublin region to achieve its carbon emission reduction targets to 2030 and 2050. This will support identification of Strategic Energy Zones and district heating opportunities in line with RPOs 7.35 and 7.38 of the RSES. The Assembly supports Policy CAP20 in the designation and implementation of a Decarbonisation Zone or Zones within the County and Section 5.5.3.7.1 states that Fingal County Council is working to identify a Decarbonising Zone and work is progressing in conjunction with Codema and CARO on the identification and implementation of this zone. This is also a requirement set out in Action 80 of CAP21. This will also be informed by upcoming Section 28 Guidelines on district heating policy.

Having regard to the above, the Council are recommended to give consideration to the inclusion of additional detail outlining how Fingal County Council will contribute to the reduction of emissions and the renewable energy targets as outlined in CAP 2021, in accordance with the relevant section 28 guidelines including the Wind Energy Development Guidelines (2006) and the Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change (2017).

The Assembly welcomes the inclusion of policy objective CAO2 in the Draft Plan that outlines the Council's support of EMRA in identifying a robust method for quantifying the relative GHG impacts of alternative spatial planning policies as part of the European Union ESPON 'QGasSP' research programme. It is anticipated that outputs from the QGasSP project are expected in Q2 2022 that should assist in this area.

In terms of sustainable transport, the Assembly welcomes the Council's promotion of active travel as part of its ongoing commitment to climate action through the work of the Environment, Climate Action and Active Travel Department which is responsible for the delivery of sustainable active mobility solutions. In terms of decarbonising transport, Policy CAP26 ensuring the provision of sufficient charging points and rapid charging infrastructure for EVs on existing streets and in new developments is welcomed. The review of the development plan offers an opportunity for further integration of policies to support mode shift to sustainable mobility, and the incorporation of key targets for mode share in the governments Smarter Travel Policy, or any update thereof.

The Assembly welcomes Policy CA24 supporting a circular economy approach and the opportunities available and recognised through the Green Economy (Chapter 7). The Assembly also welcomes the Council's policy approach to flood and water resource resilience and natural flood risk mitigation through the use of Green Infrastructure and nature based solutions and which are further detailed within dedicated chapters within the Draft Plan.

6.0 Connectivity and Movement

The Regional Assembly welcomes the Council's stated commitment in this Chapter to promote the integration of land use and transportation (Policy CMP2, Policy CMP3, Objective CM03) and to improve public transport and active travel infrastructure with an increased shift towards sustainable modes of travel. The Council also seeks to prioritise increased provision of high-quality, walkable and accessible public realm environments and safe and attractive cycling facilities to optimise connectivity between sustainable modes, which is welcomed.

In particular, the Assembly welcomes Objective CM01 to continue to work with the National Transport Authority (NTA), Transport Infrastructure Ireland (TII) and other transport agencies in facilitating an integrated set of transport objectives and to encourage modal shift towards more sustainable modes of transport and patterns of commuting. It is further welcomed that the Council will work with the NTA to develop mode share targets for the County to achieve and monitor a transition to more

sustainable modes including walking, cycling and public transport, during the lifetime of the development plan (Objective CM02) and concentrate compact growth around existing and planned transport services (Policy CMP2). The Assembly also notes upcoming Section 28 Guidelines which will inform Planning Authorities on Sustainable and Compact Settlement Guidance (SCSG), including guidance on connectivity and ease of movement for sustainable modes and place making (Action 255 CAP21 as per Annex of Actions).

Long term strategic transport planning will be facilitated by the delivery of key sustainable public transport infrastructure projects (Policy CMO22) including the Metrolink, BusConnects, Dart+, the Luas Expansion Programme and improvements to the Greater Dublin Area Cycle Network (Objective CMO23). Policy CMP6 supports and facilitates an integrated transport network recognising the sustainable mobility objectives set out in National and Regional policy which is welcomed. The Assembly supports the promotion of the Council's use of Transport Assessments and Travel planning to optimise the benefits of public transport infrastructure and supports for walking and cycling, in order to bring about behavioural change as advocated by RPO 8.7 of the RSES. The Assembly also notes and welcomes Objective CMO4 to prepare a Local Transport Plan for Balbriggan in accordance with RPO 8.6 of the RSES.

The Assembly welcomes the suite of policies and objectives that supports the delivery of a programme of high-quality cycling and walking infrastructure across Fingal County including the greenway network and the greenway projects set out in Table 6.1 which will enhance Green Infrastructure in the MASP area as advocated in RPOs 5.7 and 5.8 of the RSES. It is noted that a number of cycle routes have been omitted from the Draft Plan. It is recommended that the Local Authority consult with the National Transport Authority (NTA) in this regard and prior to the finalisation of the Plan, on the basis that the NTA are currently reviewing the Greater Dublin Area Cycle Network Plan. The Assembly also supports the emphasis in this chapter on public realm, healthy streets, permeability and accessibility which aligns with the guiding principles for healthy placemaking set out in Section 9.4 of the RSES. The Council is also directed to Action 231 of CAP 21 which requires each local authority to assess their road network and identify where additional space can be reallocated to pedestrians and cyclists to continue the improvement and expansion of the active travel and greenway network.

The Draft Plan recognises that National and Regional policy objectives seek to protect and enhance global connectivity and regional accessibility which is essential for Fingal to retain and strengthen its economic competitiveness, ability to attract inward investment and its attractiveness as a tourism destination supported by Policy CMP26 which is welcomed. In this regard, supportive policies to protect and enhance Dublin Airport, Dublin Port and the Dublin-Belfast Intercity Rail Line are welcomed. The Council is also directed to RPO 8.12 that supports the delivery of a higher speed rail connection between Belfast and Dublin and Cork. This is currently under review by the Government's Strategic Rail Review consultation. Additionally, the Council is directed to RPO 8.11 which supports the improvement, protection and strategic function of the Dublin-Belfast Corridor as part of the EU TEN-T network. It is recommended that a complementary policy for the Dublin-Belfast Corridor and recognition of the strategic function of the Dublin to Belfast road network be included in this chapter which supports and cross references related policies provided in Chapter 2 and Chapter 7 in the Draft Plan.

Policy CMP21 is noted that promotes 'Park and Ride' services at suitable locations. The Council is directed to RPO 8.14 and Table 8.5 of the RSES that supports delivery of strategic park and ride projects which include Swords, and other locations under review by the NTA as part of the review of the National Transport Strategy for the GDA. The Council is directed to Action 260 of the CAP 21 which

proposes implementation of the NTA's Park and Ride Strategy for the GDA in Q1 2022 which should further inform decision making in this area.

7.0 Employment and Economy

The Employment and Economy Chapter presented as part of the Draft Plan is welcomed by the Assembly. It recognises the County's major economic assets, including Dublin Airport, proximity to Dublin City and the Dublin Tunnel, significant road and rail infrastructure and a prime location on the Dublin–Belfast Economic Corridor (DBEC) that are also key growth enablers for the Region identified in the RSES. It is welcomed that the policies and objectives set out have been prepared in accordance with national and regional economic policies and objectives.

In particular, the Assembly welcomes Section 7.4 which sets out the strategic aims of economic development for the County based around the strategic outcomes of compact growth and regeneration, clustering and placemaking. The locations for future employment in Fingal have been informed by the requirements of the NPF and the RSES. The aim is to increase employment in strategic locations, provide for people intensive employment at other sustainable locations near high quality public transport nodes, to build on commercial and research synergies in proximity to large employers, industry clusters and smart specialisation and activating strategic sites to strengthen the local employment base in commuter towns.

The Draft Plan references that the MASP in the RSES has identified Key Strategic Development Areas in Fingal for employment and residential development. The objective of the MASP regarding employment lands is to follow a sequential approach, with a focus on the re-intensification of employment lands within the M50 and at selected strategic development areas and the provision of appropriate employment densities in tandem with the provision of high-quality public transport corridors. The Assembly welcomes the inclusion of Table 7.1 within the Draft Plan that supports the Strategic Employment Areas in Fingal County listed in Table 5.1 of the MASP within the RSES and this is supported further by overarching Policy EEP1.

Reference to and inclusion of Policy EEP14 with regard to the Local Economic and Community Plan (LECP) is a positive inclusion within the Draft Plan. The Regional Assembly has a statutory role in overseeing the preparation of LECPs and is mindful of the upcoming review period of the Fingal LECP. In this regard, the inclusion and reference to the LECP as part of the Draft Plan is a positive addition and reflects a number of RPOs included in the RSES such as RPOs 9.18 and 9.19.

The strategic aims and approach of the Chapter as set out at Section 7.4 and developed in the following sections of the Draft Plan, is considered to address a number of economic issues that impact Fingal. The Assembly welcomes the inclusion of a number of policies and objectives that are considered to reinforce the RSES such as Policy EEP3 and Objective EE02 to maximise Fingal's advantageous position and its pivotal role in the promotion of Dublin as the primary gateway in the Eastern and Midlands Region in line with RSO 14 of the RSES (Dublin as a Global City Region), Policy EEP9 and Objective EE06 to promote the continued economic development of the Dublin-Belfast Economic Corridor, objectives the support existing clusters, remote working and the suite of policies and objectives to support the green and circular economy and addressing regeneration through Policy EEP6. It is noted that Chapter 11.7.2 sets out the importance of SMART Grids and SMART cities to the County, including the newly designated SMART Balbriggan and how SMART technology can contribute to new enterprise and job creation opportunities and enhance socio-economic development. It is considered that this concept would also benefit from a complimentary policy and/or objective in this chapter, in recognition of the growing importance of this area and its success to date through SMART Balbriggan.

Sections 6.4 and 6.5 of the RSES identifies the Region's economic engines, sectoral opportunities and key sectors. The Assembly welcomes the breadth of policy contained at Section 7.5.1 of the Draft Plan which identifies key economic sectors, many of which are in keeping with those specified within the RSES. This includes future proofing the County's economy through the Green Economy (Policy EEP18), promoting the growth of the manufacturing and ICT sector (Policy EEP20, Objective EE035), the objectives to support the diverse marine sector and the comprehensive suite of policies and objectives to support Tourism in the County (Policy EEP21, 22, Objectives EE041-57). The Plan also sets out policies and objectives to support rural economies and local enterprises in addition to agricultural and horticultural production sectors, agri-business and agri-food.

The draft Plan recognises that retail plays a significant role in the growth and economy of Fingal and the retail sector is the single largest industry in Fingal County. The draft Plan sets out the retail hierarchy for Fingal in Table 7.2 which provides a summary of the overall strategy for each type of centre in the retail hierarchy in conjunction with specific policies for 'Major Town Centres', 'District Centres', 'Local Centres' and 'Rural Villages' included in this Chapter.

The County Retail Hierarchy is considered to be partially consistent with the retail hierarchy for the Region as presented in Table 6.1 of the RSES and the Retail Strategy for the Greater Dublin Area. As stated in Section 7.5.5 of the draft Plan Levels 1–3 are the centres indicated in the RSES and levels 4 and 5 centres are those determined by the development plan. The two 'Major Town Centres' of Swords and Blanchardstown are indicated at Level 2 in the Hierarchy consistent with the RSES. The Council is directed to the designations under Level 3 Town and/or District Centres which includes additional towns of Rush, Lusk and Donabate which are not included within the RSES. It is also noted that a county retail study/strategy was not prepared to accompany the draft Plan and it is recommended that the Council provide justification/evidence base approach to the designation of these additional towns as District Centres.

The draft CDP recognises the changing nature of retail and highlights that improving the appearance of streetscapes and revitalising vacant spaces, including encouraging the provision a mix of retail, commercial, leisure and residential uses in town centres that support high quality living environments will be central to supporting the retail sector. The Assembly welcomes that a key focus for retail policy in Fingal is for the regeneration of the County's towns and villages and recognition of the Town Centre First Strategy in the regeneration of towns and villages post Covid-19. The Council is directed to new guidelines published by the Government under Town Centre First: A Policy Approach for Irish Towns, published February 2022, and it is recommended that reference to same and a supportive policy be included within the Development Plan.

The Regional Assembly recognises the challenges facing traditional on-street retailing, which have been accelerated by the COVID-19 pandemic and welcome the efforts make by the Council to develop new and enhanced experiences and a sustainable mix of functions within commercial centres. The Assembly supports the continued roll out of measures to improve accessibility and permeability in the public realm, to support walking and cycling in response to ongoing COVID impacts including a shift towards home-working, as well as opportunities to facilitate co-working and remote-working spaces and a greater mix of daytime and night time uses in our urban centres.

The Eastern and Midland Regional Assembly carried out analysis to identify which urban centres are most exposed to economic disruption due to the COVID-19 pandemic, as well as an economic analysis of co-working spaces to inform targeted supports and investment, and these publications can be found on the Assembly website <https://emra.ie>

8.0 Dublin Airport

The Assembly welcomes this dedicated chapter on Dublin Airport recognising its strategic importance as a key national asset to Ireland's economic success which is linked with its global connectivity to trade and tourism markets and which requires support to ensure it continues as an economic driver (Policy DAP3) as strongly advocated in Section 8.5 of the RSES. The strategic importance of Dublin Airport as a Global Gateway is also highlighted in the Dublin Metropolitan Area Strategic Plan (MASP). In particular, the Assembly supports the Policy DAP2, Objectives DA01, DA02, DA03, DA04 which aligns with RPO 8.17 on the promotion of a secondary hub, improved terminal facilities and other infrastructure and improved access through sustainable transport modes supported through Objectives DA06, DA07 further aligning with RPO 8.18. The reference within Policy DAP2 to 'maximum sustainable potential' could benefit from further explanation as to what is meant by this.

The Assembly also welcomes the detailed section 8.5.7 and accompanying policies and objectives to ensure environmental protection and sustainability, airport noise zones, the management of appropriate land uses and noise sensitive development and to ensure public safety in the vicinity of flight paths aligning with RPOs 8.19 and 8.20 of the RSES. The Draft Plan also recognises the impact on local communities within the area, of continued growth in Dublin Airport and prioritising the role of community engagement which is also welcomed.

9.0 Green Infrastructure and Natural Heritage

The Assembly welcomes the inclusion of a dedicated Chapter on Green Infrastructure (GI) and Natural Heritage, and the recognition that parks and open space promote health and well-being, GI enhances opportunities for recreation and tourism, in addition sustains our food industry and encourages new businesses to invest in places. Also welcomed in the Draft Plan is the support of key national and regional policy objectives which centre on integrated planning for Green Infrastructure and Ecosystem Services (NPO 58; NPO 62; RSO 10; RPO 7.12) and recognition that enhanced Green Infrastructure is a key strategic outcome.

The Draft Plan sets out key policies and objectives to promote awareness and further develop the GI network, reduce fragmentation and enhance the resilience of the wider GI network. The benefits, multifunctional properties and synergies created with public open space, biodiversity, SuDs and active travel objectives are to be promoted in the County which is welcomed and aligns with RPO 7.22 of the RSES. In this regard, the attention of the Council is brought to the GI policies in Section 5.9 of the MASP and Table 7.1 Strategic Natural Cultural and GI Assets in the Region. The Assembly further welcomes the policies and objectives set out in the Draft Plan to support, protect and enhance the County's landscape, seascape, the special and high amenity areas, Dublin Bay Biosphere Reserve, the Islands, the coast and shellfish waters.

In addition, the Council is directed to Section 7.7 of the RSES which sets out Guiding Principles for local authorities in the preparation of Green Infrastructure Strategies. To enhance knowledge and expertise in this area, EMRA is currently participating in an INTERREG funded project – PROGRESS – with the objective of promoting improved governance for regional ecosystem services across 6 European regions. This involves working with regional stakeholders to identify and share Good Practices from the partner regions for inclusion on the Interreg Europe Policy Learning Platform. A project Action Plan is currently being developed and a Pilot Action is also currently testing a Green Infrastructure Decision Support Mapping Approach for Ecosystem Services and Green Infrastructure (case study is Dún Laoghaire-Rathdown County Council). It is anticipated that the outputs and learnings from the project will be transferable to the rest of the DMA local authorities.

The Assembly welcomes the strong commitment within the Draft Plan to biodiversity set out in Section 9.6 which underpins and is integral to maintaining the integrity of the GI network and the County's resilience to climate change impacts. The recognition given in the Draft Plan to the protected areas of national and international importance, and the supportive policies to maintain and enhance and protect the County's ecological buffer zones, corridors and nature development areas are also welcomed. The chapter also includes a comprehensive section and supportive policies and objectives on the coast, coastal protection and coastal tourism and recreation. In this regard the Council is directed to RPO 7.3 which supports the use of Integrated Coastal Zone Management (ICZM) to enable collaborative and stakeholder engagement approaches to the management and protection of coastal resources against coastal erosion, flooding and other threats. Overall, the Assembly commends the commitment of Fingal County Council to the principles of sustainable development and GI and looks forward to continued engagement with the Council to support the delivery of strategic GI, in line with the policy objectives of the RSES and MASP.

10.0 Heritage, Culture and Arts

This Chapter includes specific objectives and guidance relating to the protection of the County's archaeological and architectural heritage as provided for in the Fingal Heritage Plan. It is supported by the Record of Monuments and Places for Fingal, which is listed in Appendix 6 of the Draft Plan and the Record of Protected Structures also listed in Appendix 5 and shown on the Fingal Development Plan Maps. A full list of Architectural Conservation Areas (ACAs) is also listed in Appendix 5. The Assembly welcomes the suite of policies and objectives set out in the Draft Plan to enhance, integrate and protect the special physical, social, economic and cultural value of built heritage assets and ensure their preservation into the future.

Policy HCAP1 is to implement the current Fingal Heritage Plan and support the preparation and implementation of the new Heritage Plan 2023-2029. In this regard the RSES emphasises the benefits of heritage led urban regeneration for example through the protection of historic urban fabric, the reuse of historic buildings and the enhancement of places of cultural or natural interest, which can play a key role in driving tourism and economic development in terms of placemaking and enhance the vibrancy of historic town centres.

The Assembly in particular welcomes the new dedicated Section 10.7 in this chapter on Climate Change and Heritage. It is welcomed that the Council carried out the Fingal Cultural Heritage and Climate Change Risk Assessment 2021 to understand the vulnerability of Fingal's Cultural Heritage to Climate Hazards and the intention to use the data to address or mitigate, where possible, the potential Climate Change impacts identified, and in line with the goals and actions of the National Climate Change Sectoral Adaptation Plan for Built and Archaeological Heritage (2020). The Council is also directed to the annex of actions in the Climate Action Plan 2021 as they relate to heritage properties, in particular the proposed outputs of Action 205 regarding climate proof planning procedures for heritage properties including upcoming Guidelines on resilience of heritage resources under current climate conditions.

The Assembly also welcomes the attention made in the Draft Plan to Culture and the Arts recognising one of the Regional Strategic Outcomes of the RSES is to enhance, integrate and protect our arts, culture and heritage assets to promote creative places and heritage led regeneration and the suite of policies and objectives to support the growth and expansion of cultural resources within the County.

11.0 Infrastructure and Utilities

The Chapter sets out a range of policies and objectives to address a wide range of supporting infrastructure and services, including improvements in water services, water quality, the promotion of sustainable waste management in Fingal's transition to a circular economy, diversity in the energy supply and improved energy efficiency, enhanced digital connectivity and SMART technologies, and a holistic approach to flood risk and surface water management, whilst safeguarding environmental quality and providing for climatic resilience.

The Assembly welcomes the policies and objectives to support and engage with Irish Water in line with national and regional policy to facilitate projects that deliver the water services infrastructure necessary to support Fingal's settlement hierarchy, sustainable growth, mitigation and adaptation to climate change and the support of Irish Water in their role in water quality, water conservation and addressing leakage as supported by RPOs 10.3 and 10.4 of the RSES. In particular, the Assembly welcomes Policy IUP8 to identify and support the provision of key enabling infrastructure at strategic development sites in Fingal, as outlined in the MASP, to facilitate their release for development during the lifetime of the Development Plan and consult with all relevant public service providers to ensure that zoned lands are serviced in a timely fashion to facilitate opportunities for employment, enterprise creation and residential development.

The Assembly supports the Council's approach to the sustainable management of surface water using nature-based solutions through SuDS and welcome the publication of the Council's guidance document "Green/ Blue Infrastructure for Development" (provided in Appendix 11) in the provision of SuDs and its promotion at an early stage of the development process. The approach is to ensure the early consideration of surface water drainage management and open space provision in the development design process, with the overarching principle of SuDS design being that surface water runoff should be managed for maximum benefit, including water quantity, water quality, amenity, and biodiversity, which is welcomed and aligns with the Guiding Principles for SuDs set out in the RSES. It is also an objective to implement policies relating to buffer zones for riparian corridors and SuDS (Objective IUO14 refers) which aligns with RPO 7.26 of the RSES.

A Strategic Flood Risk Assessment (SFRA) of the County has been carried out to support the Strategic Environmental Assessment of the Fingal Development Plan. The assessment was carried out in accordance with the requirements of the Flood Risk Management Guidelines and the EU Water Framework Directive. The SFRA identifies and maps flood risk in the County and has supported a sequential approach to planning, in accordance with the recommendations of the Flood Risk Management Guidelines. A two-stage assessment of flood risk was undertaken, to identify flood risk and an initial flood risk assessment. The SFRA carried out flood risk area assessments and produced Justification Test tables for 24 areas within the County providing guidance for development within these areas. These are accompanied by Flood Zone Maps which highlight the areas of flood risk concern including Flood Zones A and B. It is stated in the SFRA Review that outputs from future studies and datasets may trigger a review and update of the SFRA during the lifetime of the 2023-2029 Development Plan. With regard to Climate Change, the OPW is currently transitioning to regional based climate models that reflect the likely varied impacts throughout the island of Ireland. This is likely to be implemented during the lifetime of the proposed county development plan.

The Assembly welcomes the Council's policies and objectives that support initiatives to improve water quality and to achieve "good ecological" status in compliance with the Water Framework Directive and associated River Basin Management Plans. The Draft Plan sets out ecological and environmentally

conscious objectives including Objectives IUO26 on the protection of riparian corridors and Objective IUO27 on the promotion of de-culverting which are supported.

In terms of waste management, the Draft Plan sets out a comprehensive suite of policies and objectives that support the principles of the circular economy, and the implementation of best practice in relation to waste management in the County in accordance with the requirements of The Eastern Midlands Regional Waste Management Plan 2015–2021 (EMRWMP), and future update expected in 2022, as outlined by RPO 10.25 of the RSES. The Council is also directed to the potential and opportunities of the Bioeconomy as supported by RPO 7.34 of the RSES.

The Draft Plan also includes policy objectives to facilitate and promote the development of energy networks and ICT infrastructure supporting also the provisions contained within the Fingal Digital Strategy 2020 – 2023. The Assembly welcome the designation of SMART Balbriggan in 2020 that focuses on supporting economic opportunities and driving innovation through a number of smart district projects. It is also welcomed that Fingal County Council will continue to seek opportunities to develop further Smart Districts and pilot smart places projects to scale regionally which aligns with RSES policy on economic development. It is further supported that the Council will continue to develop and implement climate action and energy related initiatives in Fingal and monitor the County's renewable energy potential. The Council is directed to Action 102 of CAP21 which sets out that the Regional Assemblies will be involved in the preparation of a policy framework to set out targets for onshore renewable electricity development and a roadmap for the development of Regional Renewable Electricity Strategies to ensure a supportive spatial planning framework for onshore renewable electricity generation development.

In relation to air and noise pollution, the Council has adopted an 'Air Quality Management Plan and the 'Dublin Agglomeration Environmental Noise Action Plan' and has made a commitment in the Draft Plan of continuing to work with the Dublin Local Authorities and relevant agencies in the collection of local air quality data through the EPA's air quality monitoring network and work proactively with the EPA to monitor and improve air quality in Fingal, which is supported by the Assembly.

Overall, the Regional Assembly welcomes the Council's commitment to the provision of high-quality infrastructure to ensure there is adequate capacity to support future development and will promote enhanced co-ordination between local authorities and infrastructure agencies for the delivery of strategic enabling infrastructure in a plan led manner, including through the fora of RSES and MASP Implementation Groups.

12.0 Other

The inclusion of a dedicated chapter to implementation and monitoring is welcomed (Chapter 12), as is the stated intention that Fingal County Council will report to the Regional Assembly, setting out progress made in supporting the objectives of the RSES and the MASP in accordance with Section 25A (1) of the 2000 Planning and Development Act (as amended). The Assembly welcomes the Council's intention to prepare an Annual Development Plan Monitoring Report on the Core Strategy. Within this report new housing development activity will be monitored, and the report will illustrate the development trends being experienced at settlement level and assess the consistency of such trends with the agreed housing and population targets as set out in the Core Strategy. The draft Plan sets out a monitoring system described in Section 12.5 to ascertain as to whether and to what extent the policies and objectives of the Plan are being realised. This system provides for the assessment of activity over the lifetime of the Plan, which includes qualitative and quantitative measures of the policies and objectives. The Assembly welcomes the inclusion of these monitoring mechanisms to

ensure effective delivery of the County's development plan and for greater transparency on the progress made in its implementation.

The attention of the Council is also directed to the development of an emerging Regional Development Monitor by the Regional Assembly, which is aligned to National and Regional Strategic Outcomes in the NPF and RSES, and it is anticipated that this monitor will go live in Q2 2022. This may provide additional support in monitoring the delivery of local authority development plans.

Chapter 13 Land Use Zoning sets out the general land-use and zoning policies and objectives of the Draft Plan and which have been informed and derived from the Draft Plan's Core Strategy. Chapter 14 Development Standards sets out the standards and criteria to be considered in the development management process and provides a comprehensive framework for the assessment of planning applications in the County. The Assembly welcomes that the guidance provided in this chapter has been informed by the NPF and RSES. The NPF and RSES encourage and support the densification of existing urban areas and promote the use of performance-based criteria in the assessment of developments to achieve well designed and high quality outcomes.

13.0 SEA, AA and SFRA

The Assembly welcomes the preparation of the Draft Plan in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA).

The SEA environmental report sets out the iterative process to date including an assessment of the overall environmental effects arising from the Draft Plan provisions. Taking into account the integration of various recommendations and mitigation measures arising from the SEA, AA and SFRA processes into the Draft Plan, which are detailed in the environmental report, it was determined that significant residual adverse environmental effects will not occur through implementation of the Draft Plan.

The Draft Plan is subject to Appropriate Assessment (AA) and a Natura Impact Report (NIR) has recorded the decisions that were taken during its preparation. It has been objectively concluded following an examination, analysis and evaluation of the relevant information, including in particular the nature of the predicted impacts associated with the Draft Plan, and the implementation of mitigatory measures identified (in this stage of the iterative process) that the Draft Plan will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects. The AA process is ongoing and will inform and be concluded at adoption of the Plan.

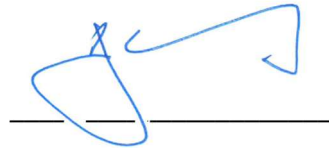
A Strategic Flood Risk Assessment (SFRA) has been undertaken alongside the preparation of the Draft Plan, the SEA and the NIR. The SFRA is required by 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (2009) and associated Department of the Environment, Community and Local Government Circular PL2/2014. The recommendations from the SFRA have been integrated into the Draft Plan, as discussed under Chapter 11 above.

Conclusion

It is considered that the Draft Fingal Development Plan, and in particular the Core Strategy, can achieve consistency with the Regional Spatial and Economic Strategy (RSES) 2019-2031 by addressing the recommendations and observations set out above.

The Regional Assembly welcomes the Draft Fingal Development Plan 2023-2029, which marks the beginning of the alignment of planning policy at county and local levels with Regional and National Policy. It should be noted that the officials of the Regional Assembly are available to discuss the matters raised above and The Assembly welcomes further opportunities to engage in the statutory process of the making of the Fingal Development Plan.

Regards,



Jim Conway

Director

Eastern and Midland Regional Assembly

11th April 2021