



**Unique Reference Number:** FIN-C377-474  
**Submission:** A Development Plan for a Sustainable Fingal

**Author:** David Healy  
**Date Created:** 12.05.2021 - 9:41pm

**Consultation:**  
Fingal County Development Plan 2023-2029 Strategic Issues  
Paper

**Status:** Submitted  
**Date Submitted:** 12.05.2021 - 11:08pm

---

## Cover Letter

This submission is not intended to be comprehensive but merely to highlight some specific issues. I support the submissions made by my Green Party colleagues, both Councillors and TDs.

## Observations:

### Quantitative assessment of climate impact

**Chapter:** Part 2 » Strategic Policy Context

The discussion on environmental assessment is at the end of issues paper. It correctly identifies that the purpose of the environmental assessment is to help inform the decisions. I think it would lead to a better understanding to consider environmental assessment at the start, in tandem with the Strategic Policy Context.

The design of the Strategic Appropriate Assessment (SEA) and Appropriate Assessment (AA) processes is specifically in order to inform the decision-making process. Therefore it is vital that the assessment is carried out in parallel with the formulation of the plan and that credible assessment is made of alternatives in order to inform choices.

We are all too familiar with SEA documents wherein the assessments are at a level of generality and vagueness that they offer little help in decision-making. In relation to some aspects of assessment it is difficult to come up with quantitative assessments. However in relation to others, it is possible to quantify impacts, however imprecisely. Impacts on greenhouse gas emissions are a good example of the latter. Building on the extensive scientific work which informs the IPCC and Ireland's National Inventory Report, along with the energy modelling work of SEAI and the transport modelling of the NTA, it is possible to develop credible quantitative assessments of greenhouse gas emissions impacts of spatial planning and transport and other infrastructure decisions.

The Eastern and Midland Regional Assembly is involved in an EU-funded ESPON project QGasSP the main objective of which is "is to produce a robust, simple and proportionate methodology that will allow competent planning authorities at national, regional and local administrative levels to quantify and forecast the influence of spatial planning policies on GHG emissions in a consistent manner." It is important that Fingal avails of the latest methodological tools such as QGasSP when it is available and requires any consultants assisting it with SEA to do the same.

QGasSP - Quantitative Greenhouse Gas Impact Assessment Method for Spatial Planning Policy  
<https://www.espon.eu/QGasSP>

---

## **Coastal monitoring and protection of sand dunes which are natural coastal protection**

**Chapter:** Part 2 » Theme 2: Climate Action

The current County Development Plan contains the following objective:

"Establish, within one year of the making of this Development Plan, a coastal monitoring programme to provide information on coastal erosion on an ongoing basis."

This still has not been done. Baseline information on the dynamics of our soft coasts is not being gathered.

In addition, the simplest measures to protect dunes from human impacts, particularly trampling, are not being taken.

The Development Plan needs to address these issues and the Council needs to comply with its own plan.

---

## **Duty of active dissemination of environmental information**

**Chapter:** Part 2 » Theme 6: Green Infrastructure & Natural Heritage

The Council has a good record of dissemination of information, particularly in using information technology to make information available to the public.

The range of information provided needs to expand to give people easy access to the environmental information gathered by and held by the Council, in order to enable all involved to better protect the environment.

This is in line with the duty of active dissemination in the Access to Information on the Environment Regulations. The Development Plan should commit to this active dissemination approach.

---

## **Access to the Coast, Protection and Improvement of Coastal Amenities and Biodiversity, Blue Flags**

**Chapter:** Part 2 » Theme 6: Green Infrastructure & Natural Heritage

Fingal has fine beaches whose water quality is intermittently threatened mostly due to inadequacies in the sewage network and treatment plants.

The Council should commit in the Development Plan to an objective of achieving excellent water quality status and Blue Flags for as many of our swimming and water sports areas as possible.

Our beaches and the rest of the coast are a vital public amenity for the Greater Dublin Area. The Development Plan should commit to improving access to beaches, including a universal access to Balscadden Beach.

The Plan should include an objective to maximise the amenity and biodiversity benefit of the proposed infill behind the West Pier in Howth, including through the provision of a major tidal pool.

---

## Baldoyle and Kilbarrack Industrial Estates

**Chapter:** Part 2 » Theme 1: People and Place

The current Development Plan contains the following objective:

### Objective BALDOYLE 2

Prepare a Masterplan for Baldoyle Industrial Estate and Kilbarrack Industrial Estate to guide and inform future development including improvements to signage and physical appearance, determine appropriate uses, provision for intensification of employment, and facilitate improvements to pedestrian access to and from Howth Junction Station and associated bus stops which can be implemented over the lifetime of the Plan.

No progress has been made in relation to this objective. It was inserted in the Plan in response to a proposal of mine that the last Development Plan should reconsider the planning objectives and rules for these areas. All involved agreed that the analysis was needed, and it was turned into an objective rather than being acted on as part of the last Development Plan process simply for workload reasons. Given the potential for intensification of employment benefitting from the public transport infrastructure at this location, this analysis needs to happen as part of this Development Plan process.

---

## Public Rights of Way

**Chapter:** Part 2 » Theme 3: Connectivity and Movement

The current Development Plan contains the following objective:

### "Objective RF116

"Map and document existing rights of way within two years of the adoption of this Development Plan. This work will be completed in consultation with landowners and the public for inclusion in the Development Plan by way of a Variation."

No progress has been made in relation to this Objective.

As the current Development Plan points out, the inclusion of existing rights of way in the plan is a legal obligation:

"Section 10(2)(o) of the Planning and Development Act, 2000 (as amended) requires that a development plan has objectives in relation to public rights of way, that public rights of way be identified on at least one map forming part of the development plan and that a list of public rights of way be appended to the plan."

---

## Active Travel, particularly to school

**Chapter:** Part 2 » Theme 3: Connectivity and Movement

The Council has in recent years developed and started to implement a strong commitment to active travel, which is being warmly welcomed by the majority of Fingal citizens. The Development Plan should reflect this approach and help to build it in to the ongoing work of the Council. This includes:

- ensuring that active travel is at the core of all planning decisions for the development of schools;
- retrofitting safe active travel access routes to all existing schools;

- reallocating road and street space to active travel;
  - including road and street redesign to protect active travel in every road maintenance task.
- 

## Demand Management

**Chapter:** Part 2 » Theme 3: Connectivity and Movement

The Issues Paper recognises that the challenges of rapid greenhouse gas emissions reductions and of coping with a growing population mean that private car travel needs to reduce. It includes this statement:

"The priority focus for the next Development Plan will be to reduce the negative impacts of car use in tandem with appropriate land use policies which will promote and facilitate effective travel options. This will include the identification of appropriate policies and objectives to ensure the efficiency and functionality of the road network, while also seeking to curb congestion."

It's not entirely clear to me whether this is a reference to demand management approaches to curbing congestion, although it's hard to imagine what else it could mean.

It's important that the Council opens the debate on demand management, which includes a range of policies, some of which can be pursued at county level, while others require or work best with regional and/or national support/implementation.

The recent Five Cities Study outlines a wide range of demand management policies and measures.

See <https://www.gov.ie/en/publication/63517-publication-of-five-cities-demand-management-study-phase-1-report-and-toolkits/>

It's important for Fingal's planning and transport teams to engage with the opportunities which demand management approaches offer to the problems of congestion, emissions, and quality of life and the Development Plan should consult the public on the options being considered.

---

## Sustainable Urban Drainage

**Chapter:** Part 2 » Theme 6: Green Infrastructure & Natural Heritage

The current County Development Plan shows a strong commitment by the Council to SUDS. However, what we're seeing in practice is not the integrated approach of widespread permeable paving, green roofs, rain gardens and swales, but a tendency to simply revert to digging enormous retention ponds in the corners of development sites. This has often been to the dismay of residents who find their open space to be unusable for informal recreation, and it fails to achieve the landscape and biodiversity objectives which a more sophisticated application of SUDS would deliver.

The Plan needs to be designed to ensure that high quality SUDS designs, reflecting best practice, are provided, rather than simply big holes in the ground. It's not clear to me exactly why this hasn't been happening. Maybe we can learn from jurisdictions which have successfully required private developers to provide high quality SUDS.

---

## Sewage overflows and misconnections

**Chapter:** Part 2 » Theme 7: Infrastructure & Utilities

The discussion of sewage in the Issues Paper (where it's called "wastewater") would give the impression that the only issue facing Fingal is treatment plant capacity. While treatment plant capacity is certainly an issue and there is a need for additional capacity to assist the overburdened Ringsend Plant, it is not the main cause of pollution in the County. Fingal's coast, beaches and rivers face frequent pollution due to the inadequacy of the sewer network including the pumping stations, including the misconnections which direct surface water into the sewers causing them to overflow.

In addition, there is the problem of sewer pipes being misconnected and discharging to surface water, an issue which very little is being done about in most of Fingal.

The Plan should commit to addressing all of the sources of sewage pollution in the County.

---

## Assessment of transport infrastructure options including for the South Fringe/North Fringe area

**Chapter:** Part 2 » Theme 3: Connectivity and Movement

The Development Plan process needs to have a clear and transparent process for evaluating transport infrastructure proposals. At the last Development Plan I proposed that a public transport corridor be indicated for protection through the North Fringe/South Fringe area (Clongriffin, Belmayne, Balgriffin, Belcamp, Stockhole.)

Councillors were advised that it couldn't be proposed because it hadn't been analysed and a majority in the Council accepted that advice.

Subsequently, the South Fingal Transport Study was supposed to evaluate the proposal. It effectively recommended that a public transport link was needed and that it should be further studied:

"Public Transport Recommendations

- "In addition to the bus services proposed by the NTA GDA Strategy, and in the longer term, it is recommended that orbital connectivity is provided to help reduce car dependency for trips not travelling to the city, but to major potential employment areas along the R139, onward to Dublin Airport and to Swords.
- "It is recommended that the potential for this route is revisited in the early 2020's with a view to deciding upon its inclusion in the NTA GDA Strategy review in late 2022."

South Fingal Transport Study | Fingal County Council

The public transport infrastructure needs of this area need to be properly addressed in the Development Plan.

---

**Documents Attached:** No

**Boundaries Captured on Map:** No