Cllr. David Healy Howth/ Malahide Area Fingal County Council, Swords, Co. Dublin

8th July 2021

An Bord Pleanála, Marlborough St., Dublin 1

Re: TA06F.310418, Baldoyle

A chairde,

I refer to the above application and make the following observations:

The development is in breach of the Fingal County Development Plan and the Stapolin Local Area and I recommend that the application be refused.

The Local Area Plan has to date formed the basis for the development of this area. Unfortunately the instability of the housing market has delayed the completion of this area far beyond what was originally intended. The basic principles of the Local Area Plan are sound and a good quality environment has resulted from its implementation.

The main flaws in the current situation are the disconnection of much of the housing from the new railway station, the poor condition of the access to the station and the lack of many of the other uses, particularly the retail and social uses, planned for the area around the station. These result from the delayed completion of the development and highlight, unfortunately not for the first time, that the phasing approach in the LAP was not resilient to the risk of delays.

This application is for revision of a permission already granted for development of this area which was in accordance with the LAP. This application is in contravention of the LAP. It is to increase the number of housing units from 554 to 981, a 77% increase from that permitted. The simplistic justification presented for this increase is that similar density and heights were permitted on the other side of the railway line.

Fingal County Council and Dublin City Council took different approaches to the development of the area on each side of Clongriffin Station. The development carried out reflects well on the planning decisions made on the Fingal side.

This is essentially a speculative attempt to massively increase the density on the site from that applicable when the current owners bought the land. It has no planning justification and is contrary to the Local Area Plan carefully developed with public participation.

In recent decades, the planning rationale for increased density development has always involved mixed use. The higher density provided for in Clongriffin was explicitly for a mixed-use neighbourhood. However, that has been abandoned at the last hurdle and permission has been granted for exclusively residential development where employment use was originally also envisaged. Now on the Baldoyle side, which was more simply residential but not as dense, this proposal is to massively increase residential densities with no extra employment zoning.

This application to revise and existing permission is a good instance of how centrally-driven changes to the planning system in recent years, intended to encourage greater house-building, have instead delayed rather than driven the development of housing, are undermining the democratic processes whereby forward planning is carried out in Ireland, and are perpetuating separation of uses simply because greater profit is available than for mixed use development.

Ιu	rge the	Board	to re	efuse	this	app	lication.
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Best regards,

David Healy