



**Submission: Public Consultation on DRAFT ‘Urban Development and Building Heights Guidelines for Planning Authorities’**

Date	24 <sup>th</sup> September 2018
Body	Fingal PPN
Contact for this Submission	<p>Jamie Moore, Fingal PPN Resource Worker</p> <p>C/O: Fingal PPN, Community Office, Civic Offices, Grove Road, Blanchardstown, Dublin 15.</p> <p><a href="mailto:ppn@fingal.ie">ppn@fingal.ie</a></p>
Community Groups contributing to this submission	<ol style="list-style-type: none"> <li>1. Aer Lingus Swim Club</li> <li>2. Briarswood Huntstown Lawn Woodlands Residents Association</li> <li>3. Donabate Portrane Community Council</li> <li>4. Dublin 15 Community Council</li> <li>5. Fingal Environment Network</li> <li>6. Fingal Orienteers</li> <li>7. Huntstown Summer Camp</li> <li>8. Kirkpatrick Rockfield Coolmine Residents Association</li> <li>9. Malahide Yacht Club</li> <li>10. Meakstown Community Council</li> <li>11. NIFTI</li> </ol>

	<p>12. Portmarnock Community Association</p> <p>13. Prosper Fingal</p> <p>14. Revival Group</p> <p>15. Rivervalley &amp; Rathingle Residents Association</p> <p>16. Rolestown Community</p> <p>17. Rush Community Council</p> <p>18. Skerries Cycling Initiative</p> <p>19. St Margarets Concerned Residents Group</p> <p>20. Sursargam Musical society</p> <p>21. Suttonians Rugby Football Club</p> <p>22. Swords Bridge Club</p> <p>23. Swords Mens Shed</p> <p>24. Swords Tidy Towns</p> <p>25. Torcaill residents association</p>
<p><b>Context</b></p>	<p>The members of the Fingal PPN Planning and Transport Linkage Group met on 4<sup>th</sup> September 2018 to consider the Public Consultation on DRAFT 'Urban Development and Building Heights Guidelines for Planning Authorities'.</p> <p>The Planning and Transport Linkage Group is made up of volunteer led Community Councils, Residents Associations, Sports Clubs, Social Clubs, etc.</p> <p>This document reflects the views of those members.</p>
<p><b>General Comments on Draft Guidelines</b></p>	
<p>Minister directive should result in re-evaluation of planning LAP/Master Plan/developmental Plan. Not override democratically decided decisions.</p> <ul style="list-style-type: none"> <li>• SPPR 1 Should be raised to direct Local Authorities re-evaluate plans not</li> </ul>	

override existing plans. There should be an objective definition of “Good Public Transport Accessibility” in relation to capacity to absorb additional people not just geographical proximity leading to displacement.

- **SPPR 2** – no comment
- **SPP3** – Delete power of Local Authority and An Bord Pleanala to ignore specific objections in Development Plan, Local Area Plan, etc.
- **SPP4 (2)** – A greater mix of building height in suburban location should not result in overshadowing existing building
- **SPA4 (3)** – Elimination of 2 storey/own door only in development of 100 or more eliminates consumer choice and is unfair.
- **New Sob objective:** No Demolition of existing cul-de-sac boundary walls without consultation and agreement of residents, similar to the process for closing right of way (i.e. lane closures)

Concern that new developments will displace green spaces/minimise green spaces in new development’s informal and active restriction residents “ownership of Area”. Minimise transient population concern that development consultation undermines by ministerial direction

- LAP should be revised, taking into direction but L.A. decides changes to LAP.
- What does good public transport accessibility mean – is it space Capacity?
- Management Companies verses Residents participation in managing their own estate.
- Building up – support needs to be pro-rata. i.e. schools, playing fields, community centre, shops. Revise LAP, not broad-brush ministerial directive.
- Mix of residential/commercial/industrial
- Light 4-story location to avoid shadowing adjacent dwelling. Problem with existing cul-de-sac walls being knocked down to develop new estates – should not be permitted.