# An Taisce Submission to the Pre-Draft Consultation on the Fingal County Development Plan 2023-2029

**March 2021**

An Taisce welcomes the opportunity to make a submission to the pre-draft consultation for the new Fingal County Development Plan 2023-2029. We request the Planning Authority take our comments into consideration in the drafting, finalisation, and adoption of the new Development Plan, including the accompanying Strategic Environmental Assessment and Appropriate Assessment.

We would also request that the Council make An Taisce known of any further consultation periods regarding the making of the new Plan.

As populations continue to grow, both urban and rural areas are often faced with increasing pressures and problems. The new Fingal County Development Plan (CDP) should represent a catalyst for positive change and facilitate the development of the county in a plan-led, sustainable manner. The CDP should strive to establish a coherent framework for the coordinated sustainable economic, social, cultural and environmental development of Fingal in line with the UN Sustainable Development Goals.

## 1.0 STRATEGIC PLANNING AND ZONING

The location of residential zoned lands needs to be informed by the CDP's Core Strategy and the National Planning Framework.

In accordance with the provisions of the Planning and Development (Amendment) Act 2010 (PDA), it is a mandatory legal requirement that the land-use zoning and other provisions of CDPs are consistent with the relevant Regional Planning Guidelines, the National Planning Framework, and S.28 Ministerial Guidelines issued under the Planning Acts 2000-2010.

The zoning of land for appropriate and sustainable uses is at the heart of planning. The PA must recognise that its own interest is only effectually achieved through integration with its region and surrounding area. The prioritisation of future development towards efficient, compact and walkable serviced locations in accordance with the sequential approach and infrastructure capacity is a necessity.

### 1.1 ADDRESSING INAPPROPRIATE ZONING

A review and reversal is required of all current zoning which would exacerbate private car use and dependence as well as worsen urban sprawl and the accommodation of new housing in locations with an inadequate walkable local service base and wastewater treatment provision.

The zoning of land at Toberburr north of the narrow Owens Bridge on the Ward River is particularly unjustified and should be reversed.

**Strategic Planning and Zoning Recommendations**

- The CDP must comply with methodical and evidence-based approaches to land-use zoning and settlement planning included under the Planning and Development Act (PDA) which require a demonstrated rational assessment of zoned land requirements based on such criteria as, inter alia, regional population targets, the sequential approach, flood risk assessment, infrastructure capacity, natural habitats and S.28 Guidance.
- Land zoned for residential development must be located in close proximity and/or be well connected by public transport corridors (rail or bus) to existing and/or proposed services (e.g. schools, retail, community/health centres, sports/amenity facilities, etc.) and employment sites.
- Following an evidence-based assessment of the quantum of zoned land within the CDP areas, where there is surplus supply, an appropriate quantum of land must be de-zoned, down-zoned or phased in accordance with the provision of the PDA 2010.
- The Planning Authority (PA) must only apply considerations of proper planning and sustainable development (i.e sequential approach, flooding, etc.) in zoning, phasing, de-zoning or downzoning land and disregard all other considerations including private interests or potential commercial or rate-generating revenue.
- The sequential approach must be applied to the zoning of all land and the review of zoning in accordance with the PDA (including the phasing, de-zoning or down-zoning land).
- Small-scale local industrial/commercial zones proximate to existing or proposed residential areas must be provided to deliver local employment opportunities rather than promoting large-scale industrial/warehouse parks.
- The zoning of land at Toberburr north of the narrow Owens Bridge on the Ward River should be reversed.

## 2.0 SUSTAINABLE LAND USE AND TRANSPORT

A defining pattern of spatial development in Fingal and around Ireland in recent decades has been of a sprawling nature. This type of land-use development has created places that lack adequate public facilities, have diminished liveability and, crucially, are dependent on private cars. Current and continuing levels of car use and dependence in Fingal have multiple adverse health and cost impacts in air pollution, noise pollution, congestion, wasteful land and resource use, reinforcing sedentary lifestyles and making local areas and urban and rural roads less attractive for walking and cycling. Transition to electric vehicles only addresses the first two of these impacts, and only incrementally.

Sprawling settlements and car dependence also contribute significantly to Ireland's greenhouse gas emissions. This must be addressed in order to ensure that the country meets its EU climate change obligations and breaks its dependence on fossil fuels.

Therefore, the new CDP must take the lead in ensuring that the planning, development, and design of Fingal's settlements encourages a shift from dispersed, car-orientated settlement patterns to walkable, cycleable, and transit-orientated development patterns.

To accomplish these goals, the CDP should include strong and enforceable policies to promote compact towns where distances between origins and destinations are shorter and where walking, cycling and public transport are prioritised. This will help ensure the efficient delivery of services and infrastructure, enhance social capital, create compact and walkable communities, and protect the natural environment. The CDP must also align with regional and national plans and strategies in order to implement such policies.

## 2.1 LAND USE AND SETTLEMENT PATTERNS

It is imperative that the CDP addresses future population growth and encourages a shift away from dispersed settlement towards more consolidated urban forms. The most sustainable form of rural development is the village/small town cluster, which allows for easy access to services and infrastructure, increases the social and economic vitality and viability of the area, creates well-connected and permeable transport networks, and maintains the integrity of the natural environment. Consolidated settlement also brings about a critical mass of people, which facilitates the development or enhancement of public transport in the area.

For rural housing, it should be a specific objective of the CDP to deliver suitable locations for serviced sites with access to piped infrastructure for those wishing to build their own houses. Development should also be consolidated in and around already serviced areas providing access to shops, schools, workplaces, etc.

Furthermore, lessons should be learned from what was a systemic failure to apply the seven test requirements for housing location in urban areas as required by the National Spatial Strategy 2002-2020[1] (Box 5.2 in the Strategy and copied below). An Taisce considers these seven tests to be well-considered measures to ensure that new housing is provided sustainably. We recommend that the PA use and expand upon them in CDP as a baseline for quantifiable improvement of housing planning. Moreover, in light of the deepening national housing crisis, the CDP must also focus heavily on requirements for the provision of social housing.

[1] National Spatial Strategy 2002-2020: http://nss.ie/pdfs/Completea.pdf

| | Evaluation Considerations |
|---|---|
| **The Asset Test** | Are there existing community resources such as schools, etc. with spare capacity? |
| **The Carrying Capacity Test** | Is the environmental setting capable of absorbing development in terms of drainage, etc.? |
| **The Transport Test** | Is there potential for reinforcing usage of public transport, walking and cycling? |
| **The Economic Development Test** | Is there potential to ensure integration between the location of housing and employment? |
| **The Character Test** | Will the proposal reinforce a sense of place and character? |
| **The Community Test** | Will the proposal reinforce the integrity and vitality of the local community and services that can be provided? |
| **The Integration Test** | Will the proposal aid an integrated approach to catering for the housing needs of all sections of society? |

*Table 1: Tests for housing locations in urban areas from the National Spatial Strategy 2002*

#### 2.1.1 Sequential Approach to Development

The prioritisation of future development in Fingal's towns towards efficient, compact, walkable, and serviced locations in accordance with the sequential approach and existing infrastructural capacity is imperative.

The town planning in the CDP should be guided by the existing essential social infrastructure (schools, community facilities, etc.) and physical infrastructure (transport, water services, communications, etc.), including realistic prospects for addressing capacity constraints. Where services are not available, there should be a reasonable expectation of their provision in the plan period. Land should not be zoned if there is no reliable prospect of providing key physical infrastructure within the plan period or a reasonable time period thereafter, such as improved roads, footpaths, drainage and lighting to serve likely future development. The PA must engage with the providers of essential physical and social infrastructure and ensure that the town-specific policies are based on realistic assessments regarding the funding and timing of such infrastructure, recognising that some levels of strategic infrastructure may take a number of cycles to provide.

#### 2.1.2 Residential development in rural Fingal villages

A systemic review is required on current zoning and development policies for the rural villages areas. Significant recent housing development has occurred in Naul and Ballyboghill on the R108 which has no sustainable location basis and has created new areas of inappropriately located commuter housing and car and SUV based lifestyles.

In addition to this development of Naul has not provided for a proper level of wastewater treatment. Specific intervention is required to curtail further car/SUV based housing in Ballyboghill, Garristown, Naul, Oldtown and Rowlestown.

## 2.2 ACHIEVING A MODAL SHIFT IN TRANSPORTATION

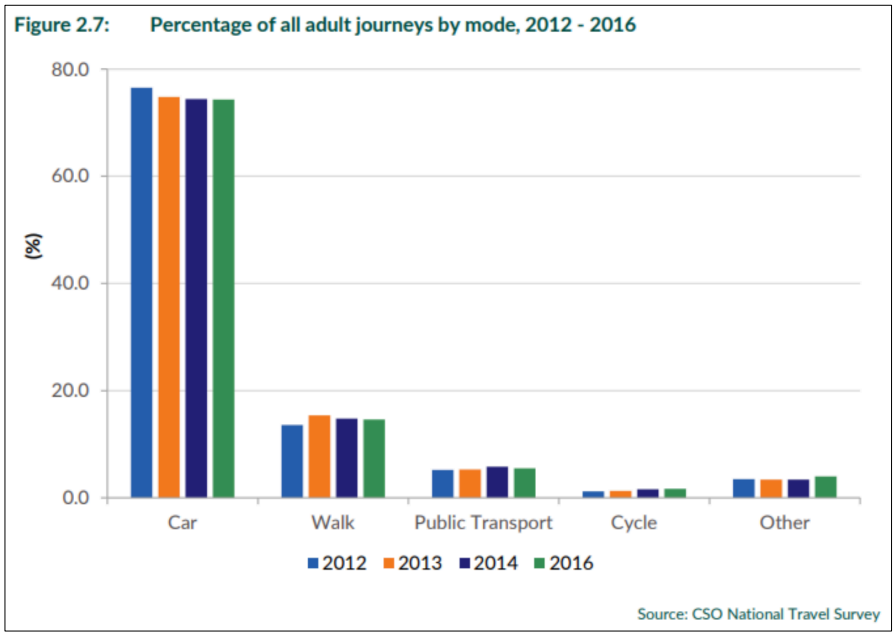
The May 2021 OECD publication of a report on sustainability issues facing Ireland[2] gives particular focus to decades of failed transport planning, better described as malplanning.

To achieve compact and sustainable settlement, combat rising transport emissions, and improve the quality of life for citizens, it is imperative that the CDP addresses future population growth and encourages a shift away from dispersed settlement towards more consolidated urban forms. A crucial aspect of this is investment in public transport, walking and cycling is maintained and improved in order to offer communities a viable alternative to private cars.

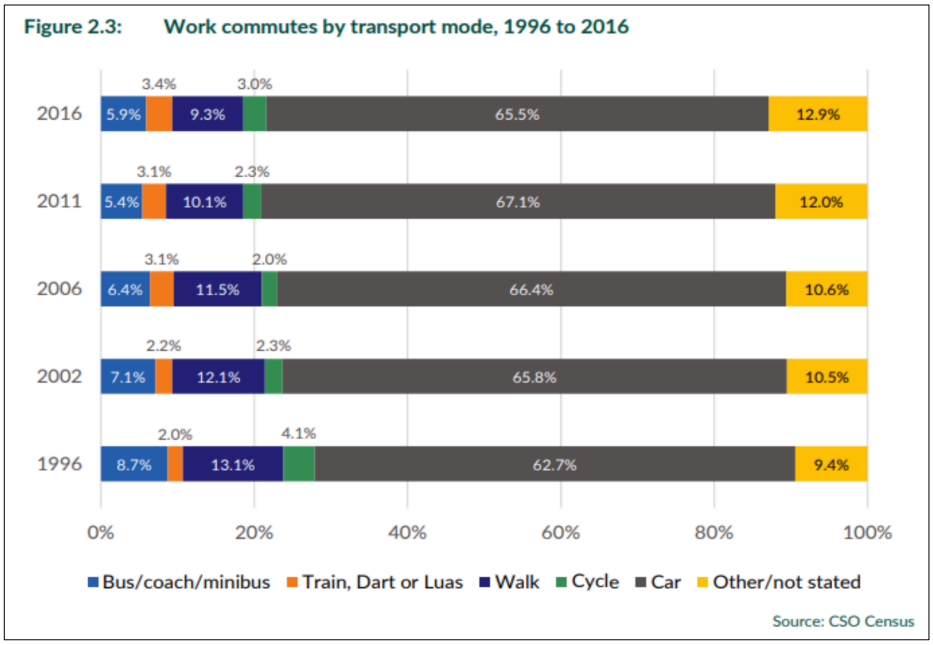
The data presented in a 2020 Government review of sustainable mobility policy[3] make it unequivocally clear that Ireland has failed to achieve the modal shift in transport that was envisioned in the Smarter Travel policy (2009) and a suite of other transport-related policies. Yet, as noted in the review, transport[4] accounted for over 27% of Ireland's emissions in 2017, with 52% of that generated by private cars.

CSO data show that private car dependence is extremely high - 74.3% of all journeys are made by car. 15% are made on foot while only 5.5% are by public transport and a shockingly low 2% by bicycle (see chart below). We note that the National Cycling Strategy, which ran in parallel to Smarter Travel, provided that 10% of all journeys would be made by bike by 2020. Notably, public transport use and accessibility in smaller towns and rural areas is also particularly poor. For example, Dublin residents are over six times more likely to use public transport than people outside Dublin.

[2] OECD Performance Review of Ireland 2021: https://www.oecd-ilibrary.org/environment/oecd-environmental-performance-reviews-ireland-2021_9ef10b4f-en
[3] https://www.gov.ie/en/consultation/f1b503-public-consultation-on-a-review-of-sustainable-mobility-policy/
[4] This does not include aviation or maritime travel emissions.




Similarly, a cornerstone target of the Smarter Travel policy was that commuting journeys made by car should drop from 65% to 45% by 2020 while commuter journeys by walking, cycling and public transport should increase to account for 55%. As the 2016 census data below shows, we have completely failed to achieve that. In fact, the share of car journeys to work has *risen* since 1996 and actually surpassed the Smarter Travel baseline of 65%. The percentage of commutes made by cycling, walking or taking the bus has decreased and is nowhere near the 55% share stipulated by Smarter Travel.



So while there is certainly now a profusion of policies and guidelines aimed at advancing sustainable mobility, it is abundantly clear that their implementation on ground is sorely lacking. To reverse this, *all* sustainable mobility policies in CDP need to be targeted, timetabled and resourced. All objectives should have highly specific annual targets attached with detailed monitoring and enforcement programmes put in place to ensure their achievement.

An Taisce considers that the five key goals of the Smarter Travel framework are still relevant and should form the basis of key objectives and policies in the new CDP:

*(i) to reduce overall travel demand,*
*(ii) to maximise efficiency of the transport network,*
*(iii) to reduce reliance on fossil fuels,*
*(iv) to reduce transport emissions, and*
*(v) to improve accessibility to transport.*

The efficacy of said policies should be bolstered by preparing a local transport plan alongside the CDP setting out how the objectives of the national Smarter Travel policy will be achieved locally and translated into measurable action. Furthermore, Mobility Management Plans must be made mandatory through the development management process for planning applications requiring applicants to demonstrate how the objectives of Smarter Travel will be achieved through the development proposal.

In the context of land use planning, the most effective means to achieve these objectives is to prevent inefficient and unsustainable car-based development sprawl i.e. planning for the best use of land to benefit from investment of public funds in physical infrastructure, including walking, cycling and public transport infrastructure.

The June 2020 Programme for Government sets out as overarching mission: *"A Better Quality of Life for All"* with *"A national clean air strategy," "Better work life balance"* and *"a fundamental change in the nature of transport in Ireland"* as key objectives.

It sets out as immediate priority actions:

> *"Necessary improvements in climate impact, quality of life, air quality and physical and mental health demand that every effort is made by the Government to make active travel and public transport better and more accessible.*
>
> *Each local authority will be immediately mandated to carry out an assessment of the road network, to see what space can be allocated for pedestrians and cyclists. This should be done immediately*."

In light of the Programme for Government mandate and the aforementioned data, we cannot overstate the urgency with which the Council needs to address the current

unsustainability of transport in the county and the ongoing failure to achieve meaningful progress toward a modal shift away from private car use.

### 2.2.1 Promoting Walking and Cycling

Advancing walking and cycling as alternatives to private car use will prove crucial to the sustainable development of Fingal. It will also contribute to improving the health and wellbeing of the county's population.

Whether in larger urban areas or in the more rural areas of Fingal, a significant level of car use is generated by short journeys that could be made by foot or, in particular, by bicycle. In addition to workplace travel, this includes school trips, family visits, access to local services and smaller shopping needs, access to local sport training grounds, and access to community facilities. A particularly problematic impact is the level of car-based trips to parks, recreation facilities and amenities, which has the effect of undermining the quality of the place of travel.

An Taisce recognises that developing strong pedestrian and cycle networks in small towns and rural areas may present various challenges. However, there are a number of existing national guidance and policy documents that can assist with active transport planning in Fingal, both urban and rural.

The National Cycle Policy Framework[5] includes practical measures to help achieve these objectives. The framework takes a methodical approach to investment and has a robust research base. Better catering for cyclists and pedestrians must follow the hierarchy of provision, which starts with cutting speed and altering traffic patterns as follows:

1. *Reduce traffic speed and enforce the law.*
2. *Reduce traffic volume, particularly HGVs.*
3. *Redesign poorly-configured junctions and better manage traffic.*
4. *Increase road space for cyclists and pedestrians (with wider inside lanes for example).*
5. *Consider dedicating hard shoulders to cyclists.*
6. *Having considered and, where feasible, undertaken all of the above, are there roads or streets that would benefit from the installation of on-road cycle lanes? Are there alignments that can be considered for off road cycle lanes?*

The Design Manual for Urban Roads and Streets provides comprehensive guidance on road design and details the differences in appropriate cycling facilities based on road size, the volume and speed of traffic, etc. (see section 4.3, and especially section 4.3.5)[6]. This manual also contains information on effective street design for pedestrian use. The Rural Cycle Scheme Design document also provides in-depth guidance on the types, layout,

[5] National Cycle Policy Framework: http://www.smartertravel.ie/content/national-cycle-policy
[6] Design Manual for Urban Roads and Streets: http://www.dttas.ie/corporate/publications/english/design-manual-urban-roads-and-streets

placement, and design of cycling infrastructure[7]. Further information can be found in the National Cycle Manual[8].

Detailed transport planning is especially important in the areas newly zoned for residential development where streets should be designed to facilitate pedestrian and cycle travel. The design concepts for these areas should provide more specific information as to what type of facilities will be provided along the designated pedestrian/cycle routes. Although new residential development proposals may provide high quality foot and cycle paths around the dwellings, these often terminate immediate outside the site boundary, thereby discouraging residents from using active travel modes outside of the development itself. This is something that the new CDP should seek to address.

It should be the policy of Fingal County Council to engage with community health, sporting and other organisations in achieving a transformative shift to walking and cycling as the default or preferred mode of choice of shorter journeys. The focus would be on family-orientated cycling, and cycling for all ages and abilities for local trips of all kinds. The initiative would focus on creating community supported safe cycling route enhancement for access to workplaces, local services, schools, parks, gyms, and sports grounds.

Immediate interventions can be carried out with low cost interventions on existing road space, which would achieve the greatest benefit in creating more attractive safe cycling routes.

A wider community and sports club initiative in promoting cycling would also benefit enhanced safe cycling to schools. This would complement the work An Taisce has been carrying out with National Transport Authority support in the area of active school travel.

### 2.2.2 Specific transport issues in the County

There is now an onus on Fingal County Council to maximise the funding opportunities available to advance an exponential shift from all types of private car use to invest in greenways and safe protected cycling routes. In Fingal the Greenway model to follow is that which opened from Baldoyle to the south of Portmarnock in 2020.

Fingal should emulate the achievements of Dun Laoghaire Rathdown County Council in 2020/2021. DLR has provided an enhanced coastal cycling route from Sandycove to Booterstown over the last year. This is in contrast to Fingal's reversal of the pedestrianisation of New Street in Malahide.

It is also in large part car traffic from the Fingal area which is adversely impacting the amenity and character of the Phoenix National Historic Park, along with air and noise pollution, either as a through driving route from Castleknock and Blanchardstown or for parking for recreational use.

[7] Rural Cycle Scheme Design: http://www.tiipublications.ie/library/DN-GEO-03047-01.pdf
[8] National Cycle Manual: https://www.cyclemanual.ie/

The levels of car use and dependence for recreational access to the Fingal coast is multiply problematic as shown by weekend leisure and "recreational" traffic congestion in Skerries, Rush, Malahide, Portmarnock and Howth. This is on top of the daily congestion to and from Sutton cross to Howth and in and around car and SUV clogged Malahide.



The surface car park swamping of the headland beside the Martello tower at Rush overlooking the island where St Patrick returned to Ireland epitomises the manner in which the accommodation of motor vehicle access destroys the character and amenity of the places to which it is provided.

The level of both daily and weekend private motorised traffic on the following roads in untenable and in large part is creating life threatening conflict with safe cycling.

The traffic levels generated from the regional and other key roads feeding into the M1 and former N1 now the R132 from Balbriggan to Dublin are particularly untenable:

- The R127 from Skerries via Lusk to Blakes Cross;
- The link to the R132 from Donabate via Turvey; and
- The R126 from Donabate passing Newbridge demesne.

The same applies to:

- The Coast road from Balbriggan to Skerries, and the R218 from Rush to Lusk;
- The R106 from Malahide to Portmarnock and R107 and R124 from Malahide to Dublin;
- The roads feeding the M50 and M2 and N2 to Ashbourne including the old N2 now the R135.

### 2.2.3 Greenways and dedicated cycle routes

Fingal now has the opportunity to advance an ambitious range of greenway initiatives for the coast, to complete the Royal Canal link and to cooperate with the other local authorities, including Kildare, in a Liffey Valley plan to link the main parks and recreational areas.

*The Fingal Coast*

Sustainable transport and recreational amenity would be transformed by a Bremore/Balbriggan to Baldoyle coastal link with new walking and cycling bridges attached to the Rogerstown and Malahide Viaducts. It is noted that permission has been granted for the greenway link on the Malahide Viaduct with projection to proceed in 2022 and that consultation has been initiated with regard to the Rogerstown Viaduct

The objective should be to achieve a greenway standard separated from vehicle traffic for as much of the route as is feasible with bollard and curb protection where running through built up areas.

Starting at the Bremore passage grave complex and restored Bremore Castke this would link to Balbriggan, Ardgillian Castle Demense, Skerries, Loughshinney, Drumanagh Head and archaeological site, Rush, crossing the Rogerstown estuary by a steel structure attached to the Rogerstown Rail Viaduct, Donabate, Newbridge Demesne, utilising a new structure attached to the Malahide rail viaduct, Portmarnock to Baldoyle greenway.

*The Royal Canal*

Resolution of the Royal Canal Greenway route to link Dublin city centre to County Kildare is a strategic priority in the finding of resolution to the constraints issue at Clonsilla.

*The Liffey Valley*

An Taisce has set out a concept outline for a greenway and safe cycling linking many parks and recreational areas along the Liffey and Rye Water Valleys in Counties Dublin and Kildare (see Appendix)

**Sustainable Land Use and Transport Recommendations**

- The PA must ensure that proactive measures are included in the CDP to promote settlement nucleation and to protect rural areas from a proliferation of car-dependent, dispersed, urban-generated settlement.
- The PA must ensure that the planning, development and design of our towns, cities and schools encourages a shift from car-orientated urban patterns to walkable, cycleable, and transit-orientated development patterns. The CDP should include strong, enforceable policies that would promote compact towns and cities where distances between origins and destinations are shorter and with walking, cycling and public transport prioritised. This reshaping of our built environment will also help reverse inactivity levels in Ireland.
- In accordance with the Sustainable Residential Development Guidelines in Urban Areas, the CDP must include policies to prohibit large-scale suburban type development proposals. Only development proposals commensurate with local physical infrastructure and social capital carrying capacity should be permitted.

- The CDP must include policies to provide alternatives to unsustainable, urban generated dispersed one off housing, including for example, a serviced site policy.
- The CDP should utilise the seven location test standards for community integration for new housing outlined in Box 5.2 of the National Spatial Strategy. Unlike sustainability/quality of life indicators, these should be threshold standards without which no development should be permitted. This requires that zoning and decisions for new housing be conditional on integration with existing communities, affordability and mix of housing types, walking and cycling access to local services and schools, public transport access to employment locations and availability of recreation facilities.
- The CDP needs to set our clear strategy and policies to coincide with existing strategies and frameworks which promote a built environment that encourages opportunities for physical activities including 'Smarter Travel', 'The National Cycle Policy Framework', 'A Framework for Improve Health and Wellbeing 2013-2025' and 'Get Ireland Active! National Physical Activity Action Plan for Ireland'.
- A local transport plan must be prepared alongside the CDP setting out how the objectives of the national Smarter Travel policy will be achieved locally and translated into measurable action.
- The CDP must include permeability and way finding studies to identify a safe network of existing/future walking and cycling routes which must be used as a chief criteria to selecting all land zoned for new development connecting with key services and amenities such as schools, shops, parks etc.
- Mobility Management Plans must be mandatory through the development management process for all planning applications (including one-off houses) requiring applicants to demonstrate how the objectives of Smarter Travel will be achieved through the development proposal.
- Include a policy to engage with community health, sporting and other organisations in achieving a transformative shift to walking and cycling as the default or preferred mode of choice of shorter journeys. The focus would be on family-orientated cycling, and cycling for all ages and abilities for local trips of all kinds.
- Provide for car-free zones in Fingal's towns.
- See sections 2.2.2 and 2.2.3 for more specific recommendations.

## 3. ADDRESSING THE CLIMATE EMERGENCY

The global climate emergency is the defining challenge of our time, and the scale of change needed to meet Ireland's commitments under EU law and the Paris Agreement is enormous. It is therefore imperative that the new Fingal Development Plan contributes to meeting sectoral targets at regional, county, city, and local levels. An overarching objective of the new CDP must be to break county's ongoing dependence on fossil fuels, stop the county's contribution greenhouse gas emissions, and prepare Fingal with the resilience to thrive in a time of climate uncertainty, all with regard to equity and Just Transition principles. All climate mitigation policies in the CDP must be targeted, timetabled and quantifiable.

As climate change both impacts and is impacted by all areas of planning and development, An Taisce recommends that each chapter of the new plan be assessed against climate objectives and targets, including those outlined in the Paris Agreement and EU policy, with regard to electricity generation, renewables share, transportation, building energy use, etc. The recent Draft Longford Development Plan provides a useful example of climate integration throughout the plan. Each chapter contains a climate context section with climate-specific objectives relating to the theme of the chapter.

Both the policies and the zoning in the new CDP should take account of up-to-date climate projections. This is of particular importance with regard to increased fluvial, coastal and pluvial flood risk. New development proposals should also be required to demonstrate consideration of this.

In 2017, transport accounted for 19.8% of Ireland's greenhouse emissions according to the EPA (2019). Therefore, further infrastructure investment in roads (outside of road infrastructure maintenance) to serve energy inefficient and emission-generating private motorised vehicles is untenable. Shaping of our society and economy around fossil fuel-based transport (i.e. dispersed settlement patterns, suburban sprawl, export growth) will inevitably undermine our position in emission reduction.

Carbon emissions in other sectors also need to be addressed and reduced. According to the SEAI's Residential Energy Roadmap, our homes account for more than a quarter of Irish energy related carbon emissions. During the next decade, we must continue to push the envelope towards cutting edge building standards for new homes.

As a priority, the need for reuse, rather than redevelopment, of existing buildings of all periods must be emphasised. Existing buildings should always be kept in use and improved in thermal performance and accessibility rather than redeveloped (projected energy savings of a new building will never overcome the massive environmental footprint of demolition and redevelopment), and having regard to the UN Sustainable Development Goals (SDGs) which oblige the reuse and repurposing of existing buildings in the aim of saving embedded energy.

## Addressing the Climate Emergency Recommendations

- A primary objective of the CDP must be to break Fingal's dependence on fossil fuels, stop the county's contribution greenhouse gas emissions, and prepare Fingal with the resilience to thrive in a time of energy and climate uncertainty.
- The CDP must include targeted and timetables policies for the above.
- All CDP chapters should be assessed against climate considerations.
- Prepare a strategy which would see the electrical generation needs of the county primarily met by renewable sources in accordance with our national obligations for 2030, including use of local renewable energy sources, district heating and combined heat and power, and energy demand reduction measures.
- Take account of the most up-to-date climate projections in all zoning decisions.

- Prioritise the reuse and improvement of existing buildings over demolition and redevelopment.

## 4.0 EMPLOYMENT AND ECONOMY

A key factor for the future economic, social and environmental prosperity of Fingal is the creation of an appropriate critical mass of population in the targeted settlement centres. The key locational criteria for new employment generating enterprises are urban centres with sufficient agglomerations of scale to support a range of vital support services and infrastructure (e.g. broadband, water services, social capital, etc.) for both the enterprise and individual employees. The new CDP needs to address the location of current employment trends, with an analysis of future demand.

The PA should also have regard to the Town Centres First policy as outlined in the 2020 Programme for Government to promote town centre regeneration and revitalisation through "*a strategic approach to town centre regeneration by utilising existing buildings and unused lands for new development, and promote residential occupancy in our rural towns and villages.*"

### 4.1 RURAL ENTERPRISE AND AGRICULTURE

An Taisce strongly supports local and rural enterprise which serves local population catchments**.** Small-scale enterprises and employment opportunities based on the sustainable use of indigenous local resources, particularly agriculture, are important in building local community resilience. To address the climate and biodiversity crises, the CDP should focus on the development of sustainable agriculture through the production of vegetable crops and the planting of native woodland.

Fingal has some of the best mineral soil lands in the country, which require protection for horticulture and crop cultivation. Ireland's level of vegetable and fruit imports needs to be radically reduced while domestic cultivation as part of a major shift from ruminant animal dominated agriculture to plant-based food production.

### 4.2 AVIATION AND DUBLIN AIRPORT

If the global and national climate and biodiversity loss emergency is to be taken seriously there is no carbon budget space to accommodate return to pre-Covid 19 aviation use levels. The global carbon budget is the diminishing annual amount of anthropogenic greenhouse gas emissions which can be safely discharged to maintain global temperatures within Paris Agreement levels.

### 4.3 RETAIL DEVELOPMENT

Over the past decade there has been sustained pressure from multiple retail operators for out-of-town big box retailing and to circumvent the sequential approach. The key drivers of

this trend are convenient access to publicly subsidised road networks, increased price competition and the ability to provide significant amounts of free surface car-parking.

The granting of out-of-town centres as resulted in the decimation of historic town centres and the loss of many long-established local retailers. This in turn has had a knock-on impact for built heritage, social capital and quality of life.

To protect the vitality of Fingal's town centres and rural areas while promoting economic development, An Taisce make the following recommendations regarding retail and commercial development:

**Economy and Employment Recommendations**

- Implement a Town Centre First policy in line with the 2020 Programme for Government.
- Ireland's principle resource is our abundant availability of fertile agricultural land. The CDP must include policies to promote sustainable agriculture, particularly the production of vegetables, grains, pulses, fruits, etc.
- The CDP should include a policy for the promotion of local farmers' markets and identify locations where farmers' markets can take place.
- Out-of-town commercial and/or retail development must be strictly prohibited. Where it has been permitted historically, car parking charges must be made mandatory to level the playing field and the unfair competitive advantage accruing to 'big box' out-of-town retailer from free car parking and publicly subsidised road infrastructure.
- The PA should take an active role in site assembly for new retail development on brownfield and infill sites, including using CPO powers where necessary to provide for the sensitive revitalisation of town centres.
- The CDP should include a specific policy that explicitly provides that the change of use of retail warehouse units to non-bulky goods comparison and/or convenience uses will not be permitted.
- The CDP should include a policy which restricts large floor-plate multiples, which are dependent on complex fossil fuel-dependent supply chains, in favour of smaller floor-plate local shops.

## 5.0 WATER

The Planning and Development Act includes specific mandatory objectives to ensure the integration of water quality management requirements into the physical planning process. The management of surface and ground water in accordance with the provisions of the EU Water Framework Directive (WFD) will be one of the most crucial overarching challenges in this CDP. Ireland faces an immense challenge in achieving 'good' status in all water bodies by 2027 as required by the WFD.

The EPA's latest report on Water Quality in 2019 (published in December 2020)[9] reveals that water quality trends in Ireland continue to be problematic. The report indicates that over one third of rivers and a quarter of lakes are failing to meet their environmental quality standards for nutrients. Of particular concern are the increasing pollution trends since 2015, with nitrate found to be increasing in nearly half of river sites, and phosphate increasing in a quarter of sites. This is in stark contrast to the situation in 2015 when nitrate was increasing in only 1.4 % of our rivers, and phosphate in 4%.

The achievement of our Water Framework Directive obligations for 2027 will have linked benefits in the protection and enhancement of biodiversity, combating climate change, improving human health, protecting landscape, and creating more sustainable settlement patterns.

We would highlight a recent court ruling by Justice Hyland (2018 740 JR), which clarifies how unassigned waterbodies must be treated when assessing planning applications against Water Framework Directive requirements, with implications for projects in proximity to unassigned waterbodies:

> "*The WFD, as interpreted by the CJEU, requires a Member State to ensure that the requirements of Article 4 are met before permission is granted. It cannot be so satisfied in respect of development affecting a water body whose status has (in breach of the WFD and the implementing regulations in Ireland) not been assigned by the EPA*." [para 130 2018 740 JR]

This should be reflected in the CDP.

### 5.1 MUNICIPAL WASTEWATER TREATMENT

After agriculture, wastewater discharges to water from human settlements, including towns, villages and rural houses, is generally the biggest source of water pollution through discharges of phosphorus, nitrogen, ammonium, pathogens, etc. The Implementation Review Country Report issued by the European Commission highlighted Ireland's position stating there are substantial implementation issues in Ireland when it comes to the Urban Waste Water Treatment Directive (EC, 2017).

As reported by the EPA in 2020[10], 19 out of Ireland's 172 urban areas failed the mandatory EU wastewater treatment standards in 2019, and these same 19 are responsible for over half of the country's sewage. 35 towns and villages are discharging raw sewage into waterbodies.

[9] EPA (2020) Water Quality in 2019: https://www.epa.ie/pubs/reports/water/waterqua/waterqualityin2019-anindicatorsreport.html

[10] EPA (2020) Urban Wastewater Treatment in 2019: https://www.epa.ie/pubs/reports/water/wastewater/Urban%20waste%20water%20treatment%20in%202019%20Report%20%20web%20version.pdf

Ensuring that adequate wastewater treatment capacity exists prior to the approval of new development in cities and towns must be provided for in the CDP.

An Taisce would share the concerns regarding wastewater treatment expressed by Inland Fisheries Ireland in their submission.

### 5.2 SURFACE WATER

The Intergovernmental Panel for Climate Change (IPCC) has predicted that Ireland will experience more intense and prolonged rainfall events as the climate crisis worsens. This has been evidenced by the recent serious rainfall events and flooding throughout Ireland.

The (formerly) Department of the Environment, Heritage & Local Government also issued the Flood Risk Assessment and Management Guidelines under Section 28 of the PDA 2010 on the management of flood risks and the planning system. This allows for the de-zoning or down-zoning of lands where their development would comprise an unacceptable flood risk.

Conventional hard-engineered storm water management systems to drain surface run-off from asphalt, concrete, and roof tiles are costly to implement and maintain. They also frequently fail causing urban flooding and degradation of water quality. Sustainable Urban Drainage Systems (SUDS) are now becoming the norm throughout Ireland and should continue to be prioritised and required by the CDP.

**Water Recommendations**

- The CDP must include a suite of integrated policy measures to ensure that the PA's legal obligations under the Water Framework Directive and the operable River Basin Management Plans are achieved.
- The CDP must be fully consistent with the PA's legal obligations under the Waste Water Discharge (Authorisation) Regulations (SI No. 684 of 2007).
- Circular Letter PD7/09 issued by the (formerly) Department of Environment, Heritage and Local Government sets out the "Combined Approach" and requires that planning permission should not be granted to development proposals where there is insufficient cumulative capacity within the relevant wastewater treatment plant. This further underlines the imperative for new development to be channelled to targeted development centres where the appropriate physical infrastructure is planned or present.
- The CDP must include policies to provide alternatives to unsustainable urban-generated dispersed one-off, including, for example, a serviced site policy.
- The PA must ensure that all private wastewater treatment proposals comply with the EPA Code of Practice and other related regulations.
- The CDP must de-zone or down-zone lands categorized in 'Flood Zone A' of 'Flood Zone B' applying the sequential approach. Where the zoning of recognised flood-prone areas is retained, a detailed Justification Test in accordance with the Flood Risk Assessment & Management Guidelines must be carried out.

- The use of Sustainable Urban Drainage Systems (SUDS) and rainwater harvesting must be mandatory for all new development proposals.

## 6.0 NATURAL ENVIRONMENT & BIODIVERISTY

Fingal is very rich in natural heritage, and it is imperative that this be protected in the policies and objectives of the CDP.

As highlighted in 'Our Sustainable Future, a Framework for Sustainable Development for Ireland', increasing prosperity, in Ireland and across the world, has allowed many people to enjoy the benefits of goods and services which were once available to just a few. While this shared prosperity represents huge progress, it does so at a cost of unsustainable patterns of consumption and production. The pressures on resources - raw materials, minerals, metals, food, water, soil, biodiversity, air, biomass and ecosystems - continue to increase. This enduring, negative trend endangers the availability of natural resources and impacts negatively on the quality of our environment and on human health and biodiversity, both within Europe itself and globally[11].

The 2018 "Living Planet Report" from the World Wildlife Fund[12] presented a very bleak picture of the state of global biodiversity. There has been an overall 60% decline in species population size in just over 40 years (1970-2014). This decline is at 83% for freshwater species.

Ireland has a poor record when it comes to protecting the natural environment. The sprawling nature of development and settlement pattern is a driving force for habitat fragmentation, biodiversity loss, agricultural land loss and is contributing to climate change. The 2019 report on "The Status of EU Protected Habitats and Species in Ireland[13]" (prepared every six years as required by Article 17 of the EU Habitats Directive) illustrates the poor condition of Ireland's biodiversity. Out of Ireland's 59 protected habitats, 85% were assessed as being in an unfavourable conservation status and 46% suffering from ongoing declines. The report highlighted agriculture and development (housing, commercial, industrial, and recreational) as two of the primary threats facing these habitats.

Fingal County Council should set a lead example in minimising the use of herbicides and pesticides, while at the same time ensuring the control of invasive plant pieces. In particular, the Council should seek to promote biodiversity through pollinator-friendly planting and maintenance where possible for land and areas in its control, including in graveyards.

[11] Department of Environment, Community and Local Government. (2012) 'Our Sustainable Future, a Framework for Sustainable Development for Ireland

[12] https://www.worldwildlife.org/pages/living-planet-report-2018

[13] Article 17 Report Summary 2019
https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol1_Summary_Article17.pdf

The CDP should lay out specific actions to ensure that the protection of Natura 2000 sites in Fingal, as well as biodiversity more generally, is upheld in the planning process at all levels.

### 6.1 NEW EU POLICIES

In May 2020, in furtherance of the 2019 European Green Deal, the European Commission published in parallel two key strategies: *"A Farm to Fork strategy for a fair healthy and environmentally friendly food system*" and "*EU Biodiversity Strategy for 2030 - Bringing nature back into our lives".*

The Biodiversity Strategy sets out a 14-point EU Nature Restoration Plan:

1. *Legally-binding EU nature restoration targets to be proposed in 2021, subject to an environmental impact assessment. By 2030, significant areas of degraded and carbon-rich ecosystems are restored; habitats and species show no deterioration in conservation trends and status; and at least 30% reach favourable conservation status or at least show a positive trend.*
2. *The decline in pollinators is reversed.*
3. *The risk and use of chemical pesticides is reduced by 50% and the use of more hazardous pesticides is reduced by 50%.*
4. *At least 10% of agricultural area is under high-diversity landscape features.*
5. *At least 25% of agricultural land is under organic farming management, and the uptake of agro-ecological practices is significantly increased.*
6. *Three billion new trees are planted in the EU, in full respect of ecological principles.*
7. *Significant progress has been made in the remediation of contaminated soil sites.*
8. *At least 25,000 km of free-flowing rivers are restored.*
9. *There is a 50% reduction in the number of Red List species threatened by invasive alien species.*
10. *The losses of nutrients from fertilisers are reduced by 50%, resulting in the reduction of the use of fertilisers by at least 20%.*
11. *Cities with at least 20,000 inhabitants have an ambitious Urban Greening Plan.*
12. *No chemical pesticides are used in sensitive areas such as EU urban green areas.*
13. *The negative impacts on sensitive species and habitats, including on the seabed through fishing and extraction activities, are substantially reduced to achieve good environmental status.*
14. *The by-catch of species is eliminated or reduced to a level that allows species recovery and conservation.*

These 14 points should be incorporated into the policies, objectives and land zonings of the new CDP. The key recommendations of the Farm to Fork strategy should also be integrated into the new plan.

#### 6.1.1 Urban Greening

We would highlight Point 11 of the aforementioned EU Biodiversity Strategy that: "*Cities with at least 20,000 inhabitants have an ambitious Urban Greening Plan*."

It is therefore submitted that the new Development Plan should provide for the immediate development of an Urban Greening Plans where appropriate, if not already accomplished by the end of 2021, as well as specific timelined and targeted policies for achieving the objectives of the Urban Greening Plans during the plan period. Urban greening proposals should also be put in place for Fingal's smaller towns.

### 6.2 FINGAL'S TREES

The Council should complete the planned re-survey of all street trees (and include hedgerows) without delay and ensure that future development is planned around, rather than at this expense of this green infrastructure. This survey should highlight veteran and ancient trees on public (and where possible) lands and ensure that Tree Protection Orders are put in place as soon as possible. Vintage and historic trees should be protected from either felling or routine pruning

**Natural Environment & Biodiversity Recommendations**

- The CDP and development management decisions of the PA must rigidly adhere to its substantial legal obligations under EU law, particularly with regard to the Habitats and Birds Directives.
- Seek to promote biodiversity through pollinator-friendly planting and maintenance where possible for land and areas in its control, including in graveyards.
- Achieving adherence to the PA's legal obligations under the Habitats Directive and other environmental legislation cannot be achieved without the preparation in tandem with the CDP of a full Strategic Environmental Assessment and Habitats Directive Assessment.
- The 14 points of the EU Biodiversity Strategy 2030 should be fully incorporated into the CDP. The Farm to Fork policy recommendations should also be incorporated.
- Urban Greening Plans should be put in place where applicable line with Point 11 of the EU Biodiversity Strategy. Urban greening measures should also be provided for in smaller towns.
- Complete the planned re-survey of all street trees (and include hedgerows) without delay and ensure Tree Protection Orders are put in place, particularly for ancient and veteran trees.

## 7. CULTURAL HERITAGE

Ireland's unique built and cultural heritage in increasingly threatened with destruction. Ireland is a signatory to UNESCO's Convention Concerning the Protection of the World Cultural and Natural Heritage ratified by Ireland in 1991 and the Granda Convention ratified in Ireland in 1995. These conventions provide the basis for our national commitment to the protection of architectural heritage, the importance of "*handing down to future generations a system of cultural references*". To be effective, it relies on its signatory countries implementing their own national protective regimes.

The CDP should ensure the effective promotion of the Architectural Heritage provisions of Planning and Development Act and therefore the protection of Fingal's built heritage, including Architectural Conservation Areas (ACAs) and Protected Structures. The CDP should include policies for monitoring buildings at risk and using the provision of Section 59 of the PDA 2010 to serve notices of endangerment to negligent property owners.

It is submitted that Clonsilla should be designated as an ACA and that the Railway Keepers' Cottage, Portestown, Closilla should be added to the record of Protected Structures.

**Cultural Heritage Recommendations**

- The most significant demesnes and designed landscapes in the county should be identified and planning policies applied to maintain and enhance their special character and significance in considering agricultural, recreational or other development.
- The CDP should seek to designate more ACAs and Special Planning Control Schemes.
- S.48 development levies for Protected Structures should be waived to encourage sensitive reuse and adaptation.
- Important views and prospects must be protected.
- The Architectural Heritage Protection Guidelines for Planning Authorities must be implemented in full.
- The CDP should include policies for monitoring buildings at risk and using the provision of Section 59 of the PDA 2010 to serve notices of endangerment to negligent property owners.
- Clonsilla should be designated as an ACA, and the Railway Keepers' Cottage, Portestown, Closilla should be added to the record of Protected Structures

An Taisce requests your consideration of the above comments and would welcome further opportunities to engage in the preparation of the new Fingal County Development Plan.

**Appendix**

# Liffey Valley Parkways

**A GREENWAYS LOWER LIFFEY VALLEY ROUTE FROM CASTLETOWN TO PHOENIX PARK AND LINKING CHAPTALIZED, PALMERSTOWN, LUCAN, LEIXLIP, CELBRIDGE. ADAMSTOWN AND MAYNOOTH**

***DRAFT FROM AN TAISCE JUNE 2020***

## 1. Outline of Proposal

This proposal is to reactivate the 2007 for the Lower Liffey Valley Kildare to Dublin "Gateway" project by Kildare, Fingal, South Dublin and Dublin City Councils (see press report appended) and advance the cycling enhancement and Greenways investment objectives set out in the June 2020 Programme for Government:

> *"We will lead the development of an integrated national greenways strategy. This has the potential to transform modal shift and improve air quality and public health. The commitment to cycling will enable us to achieve the huge ambition of developing an integrated national network of greenways to be used by commuters, leisure cyclists and tourists. We will continue the coordinated approach between central government, local authorities, and agencies to deliver on this ambition."*

A Kildare and Dublin Lower Liffey valley area initiative would achieve a major modal shift from unsustainable private car use for commuting, school travel local journeys and leisure/sports activity as well access to parks and recreation through :

- An integrated and signposted "PARKWAYS" Spine Route link from Phoenix Park, along Liffey Valley via Lucan through St Catherine's Park to Leixlip and via Barnhall Road past Wonderful Barn to Castletown Demense Celbridge via Gothic Lodge Gate;
- Feeder links to Maynooth via Royal Canal to Louisa Bridge Leixlip, and Adamstown via enhanced safe cycling route to Lucan. This with Spine Route would have major benefit the historic centres of Lucan Leixlip Celbridge and Maynooth;
- Significantly enhancing safe cycling provision from the main population centres along existing routes to enhance access to village centres, employment schools, parks and recreation and into the parkways spine and feeder routes.

## 2. The Issues

Much of the car congestion that is so problematic to the amenity of the historic centres of Lucan, Leixlip, Celbridge and Maynooth is for short journeys from the immediate area that could be done by bicycle if safety enhancement and traffic control measures were put in place particularly to make it attractive for families from the newer residential areas.

The commuter cycle route from Lucan to Chapelizod is entirely substandard and unpleasant as a family leisure route. The long, straight section of the Celbridge to Lucan road is marked by excessive traffic speeding.The scenic north river valley Strawberry beds route from Lucan to Chapelizod and to and from Phoenix Park has become a rat run for speeding traffic.

The Royal Canal provides a Greenway quality route from Maynooth to Louisa Bridge Leixlip but the link to the village and to Castletown via Barnhall road, which would provide a route to Celbridge, is substandard.

The cycle path system from the new town of Adamstown to Lucan village is substandard and does not form an attractive coherent link to Lucan Village and St Catherine's Park.

The level of car use to gain access to the Phoenix Park, St Catherine's Park and Castletown, and parks and sports clubs generally like Westmantown from the surrounding catchment areas is unsustainably car based.



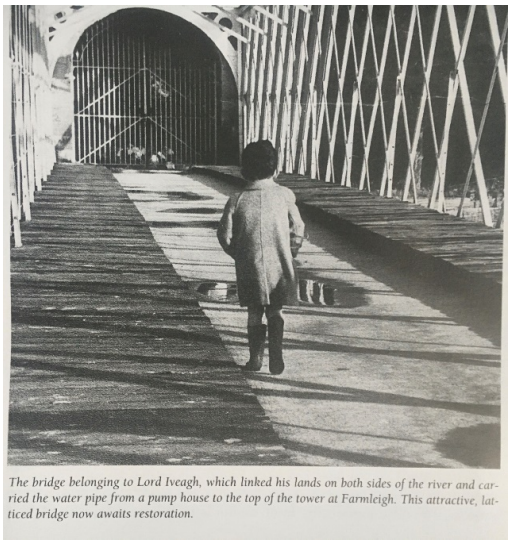
*Image 1 Access to leisure and sport is unsustainably car-based. Car park at Westmanstown sports complex, Lucan.*

Being able to walk or cycle to a park or to a cafe in the nearest historic village like Leixlip, and parks and recreation, should be as attractive an experience as the destination as well as contributing to a more healthy lifestyle.

# 3. The Parkways Spine Route




## 3.1 PHOENIX PARK TO LUCAN



*The bridge belonging to Lord Iveagh, which linked his lands on both sides of the river and carried the water pipe from a pump house to the top of the tower at Farmleigh. This attractive, latticed bridge now awaits restoration.*

*68 Palmerstown – An Ancient Place*

local residents of the vicinity on the necessity for a footbridge or road bridge across the Liffey.

Continuing their investigations on the spot, the committee examined the private footbridge belonging to Lord Iveagh, which entered the grounds attached to his residence at Farmleigh at the Lower Road. The temporary use of the footbridge pending the building of a new bridge was under consideration. Lord Iveagh, who had recently procured a new boat for the ferryman said he would be very slow to hamper the ferryman in making his livelihood by allowing the public to use his footbridge. However, a plan to compensate the ferryman by the County Council on the opening of the private footbridge was favourably considered by his Lordship.

Ultimately the County Council concluded, that as the cost of providing a footbridge had been estimated at £3,000 and a road bridge at £12,000, to embark on such an expenditure would be preposterous. As it was, the Council had also been advised that the construction of a footbridge, even if it were considered necessary, would be illegal.

The Roads Committee could not recommend such expensive work and it was decided that the matter be postponed until inquiries had been made as to the right of the Council to erect a footbridge. The County Solicitor would later inform the Council that in his opinion the council had no power to construct the proposed footbridge in any case as it would not connect two public roads. The ferry continued to operate up until the 1940s.

*Image 2. Guinness Bridge*

Phoenix Park via enhanced safety junction at Knockmaroon Gate to Guinness Bridge at Knockmaroon to Waterstown Park then along River under M50 taking inland loop through

institutional lands to St. Edmondsbury to link with existing river path to school at Lucan village. Bollard protection to enhance safe route from Lucan School to Lucan demesne entrance to St Catherine's park for Lucan to Leixlip link.

## 3.2 LUCAN TO LEIXLIP

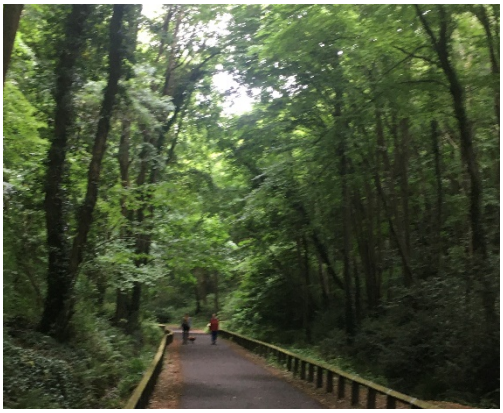





*Image 3 & 4. St Catherine's Park Lucan provides a superb link between Lucan and Leixlip is positioned to form the central pivot of a Lower Liffey Valley cycle walking Greenways "PARKLANDS" access network.*

## 3.3 LEIXLIP TO CASTLETOWN / CELBRIDGE

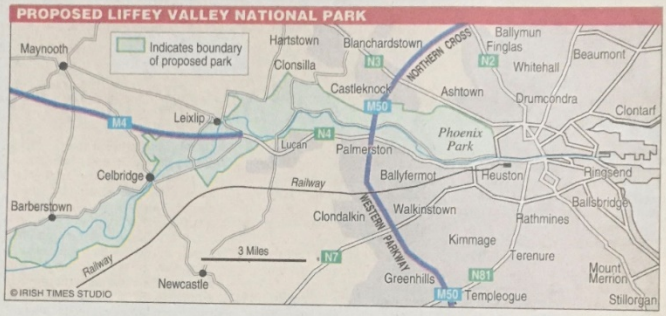
Cycling Safety enhancement through Leixlip Village to Barnhall Road. Bollard protection on Barnhall Road (with loop access to Wonderful Barn), continuing over M4 to Liffey bridge at Canoe Club. Safety enhancement at road to provide access to existing lane way to Castletown gothic gate and route to Celbridge.



*Image 5. Wonderful Barn*

# Report suggests turning Liffey valley area into national park

PAUL CULLEN 1-3-04




The Liffey valley in counties Kildare and Dublin should be designated as a national park in order to protect its landscape from over-development, according to a new report.

Designation of an area stretching from Islandbridge in Dublin to Straffan in Co Kildare would provide the best way of developing the recreational and tourism potential of the valley, the report prepared for an umbrella group of local, residents' and environmental organisations says.

The Liffey Valley Park Alliance believes the park can be created initially at no cost to the taxpayer, simply by leaving the lands in their current agricultural or amenity zoning. However, it suggests the establishment later of a Liffey Valley Authority to oversee the development of the area and co-ordinate the activities of the four county councils along the river.

The alliance says it is not against housing or other development in the area but is "strongly of the view" that there is adequate land available for this purpose outside the valley. It believes some landowners would regard national park designation as an "enhancement" of their properties.

The proposal is modelled on the Lagan Valley Regional Park, which extends from Belfast to Lisburn and was established in the 1960s. The Laganside park passes through three local authority areas, but is managed by the Northern Ireland Department of the Environment. The report, which has been seen by *The Irish Times*, will be launched at a conference on the Liffey Valley National Park next Saturday (March 6th) in the Spa Hotel in Lucan.

The Liffey valley is a vital but fragile "green lung" for the burgeoning communities of west Dublin and north Kildare, the report says. Together with Dublin Bay and the Dublin-Wicklow mountains, it is one of the main natural amenities in the region and has been a tourist destination since the 19th century.

"Few capital cities anywhere have on their doorsteps such a magnificent landscape, still largely intact."

The lands already in State ownership, together with institutional land and land in private recreational use, means that the "nucleus" of the park is already in place. All that is required, the report says, is the "political will to make it a reality".

The possible benefits of a park are examined, including the opening up of the river corridor to public access; additional playing facilities for local sports clubs; and the potential for recreational activities.

The valley embraces a wide variety of natural and historical attractions, from parks such as the Phoenix Park and Lucan demesne, to period houses such as Castletown and Farmleigh.

There are six national parks in the State, all in rural or mountainous areas and entirely in State ownership.

Members of the alliance include An Taisce, the Irish Georgian Society, the Irish Wildlife Trust and 16 community organisations from Dublin and Kildare.

In 1990, a special amenity area order (SAAO) was issued to protect the Liffey valley. This has been renewed at five-yearly intervals since.

However, the report says this order only covers a narrow area along the riverbanks, has not been extended and has provided insufficient protection against repeated attempts to rezone lands in the area. It says the local "archetype" for the creation of a national park is the Phoenix Park, which was created by James Butler, Duke of Ormonde, over 300 years ago, in the face of commercial and political opposition.

"The achievement of a Liffey valley park in the first years of the new millennium would be as visionary an action as was the creation of the Phoenix Park 350 years ago." More information on next Saturday's conference is available from the LVPA at 6283178/6245415.

**Background to Liffey Valley Park link proposals**

The Irish Times carried a report on 1 March 2004 "Report suggests turning Liffey Valley area into National Park". The report was in advance of a conference by the Liffey Valley Park Alliance which included "An Taisce the Irish Georgian Society the Irish Wildlife Trust and 16 community organizations from Dublin and Kildare. The initiative was modelled on the Lagan Valley Regional Park extending from Belfast.




# Giant Liffey park to stretch 20km into heart of Dublin

SUNDAY TIMES AUG 29 2007

■ Mark Tighe

THE banks of the river Liffey are to be developed as Ireland's largest linear park, incorporating a "necklace" of 14 features from Heuston station to Celbridge in Co Kildare.

Four local authorities are working together on the ambitious project; they believe the banks of the Liffey have been "abandoned or forgotten" as a public amenity.

Eugene Keane, a project co-ordinator at the Office of Public Works (OPW), said: "The essence of the park is already in existence, but linking it all together will create a far greater appreciation of what is effectively a green lung reaching into Dublin.

"By linking all these projects together we can create an entity that defies administrative boundaries and would be the envy of other European cities."

One of the main recommendations of an OPW feasibility study is that the entire park be given a new uniform brand to promote its identity. To that end, there will be a public competition to rename the park and to get away from the Liffey Valley name, which is now seen as synonymous with the shopping centre.

When completed the park will have cycle and pedestrian paths along 20km of the river from Dublin city centre to Celbridge. Housing development within the valley is to be restricted.

Three of Dublin's local authorities, Dublin city, Fingal and south Dublin, along with Kildare council, are applying for €60m to fund the project from the National Development Plan's €300m Gateways Innovation Fund. Dublin city council is taking the lead in applying for the funding. Even if the authorities are successful, they will still have to contribute at least €20m.

Allocation of the Gateway funds is expected to be announced by January, and the proposed park could be finished by 2010. Work on some of the park's 14 flagship projects has already begun. How far the work progresses depends on securing the NDP funding.

Starting from the city, the first project, to be carried out by Dublin city council, is to extend the Liffey boardwalks to Heuston station. The second project, which has already secured planning permission, is a 40-metre pedestrian bridge across the Liffey near Chapelizod. This will connect the banks of a new riverside park between Islandbridge and the centre of Chapelizod.

A new entrance to the National War Memorial Gardens in Islandbridge is also planned. The gardens will be linked with Phoenix Park through a new bridge, as was originally intended by its architect, Sir Edwin Luytens, in the 1930s.

A new riverside park is to be created in Celbridge and access to the river banks in Leixlip is to be improved. St Catherine's Park and the Lucan Demesne are to be linked together with yet another new bridge.

**'By linking projects we can create an entity that would be the envy of other European cities'**

The centre of the new park will be the Anna Liffey mills, a former flour mill at the Strawberry Beds near Lucan. According to Michael Lynch, senior parks superintendent with Fingal council, the mill will become an interpretive centre for the park. A museum will focus on how the Liffey was used for industry and hydroelectrical power.

The mill will cost €6m to renovate and the council still has to negotiate the purchase of nearby land for car park space and pedestrian access.

"It is a fully functioning mill," said Lynch. "Its central location in the valley makes it a perfect visitor centre. People will be able to learn about the rest of the valley and about the archeological and industrial history of life in the Liffey valley."

The problems faced in completing the mill project, however, is one that could delay other parts of the project. Much of the land in the valley remains in private ownership, including land banks owned by developers. One of the 14 features of the new park is the restoration of the historic Guinness bridge near Palmerstown by Fingal council. South Dublin council is still in negotiations to buy the privately owned land directly south of the bridge.

The overall concept is based on the Lagan Valley Regional Park in Northern Ireland and campaigners say the councils should follow its example by beginning the project before buying up all privately owned land. The councils say this isn't feasible because Irish law does not grant the same public right-of-way on privately owned land.



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