



Oifig an
Rialaitheora Pleanála
Office of the
Planning Regulator

31st July 2026

Planning and Development Department,
Fingal County Council,
County Hall,
Main St.,
Swords,
Co. Dublin,
K67X8Y2.

Re: Draft Dunsink Urban Area Plan

A chara,

Thank you for your authority's work in preparing the draft Dunsink Urban Area Plan (Urban Area Plan).

As Fingal County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is to evaluate and assess statutory plans to ensure consistency with legislative requirements and national and regional planning policy. The Office has undertaken this evaluation and assessment pursuant to Part 3 of the Planning and Development Act 2024 (Act) and its functions under section 546, and this submission sets out the outcome.

In this context, submissions may include recommendations and observations. Recommendations arise where the Office identifies clear inconsistencies with legislative provisions or policy frameworks and are intended to be addressed to ensure compliance. Observations highlight areas where further clarification, justification, or refinement would strengthen the plan. The submission may also include advice to support the proper planning and sustainable development of the area.

Following adoption of the Urban Area Plan, the Office will carry out a further assessment under section 78 of the Act.

1. Overview

Dunsink is strategically located approximately 7km from Dublin City Centre and represents one of the most significant opportunities for sustainable urban growth within the Metropolitan Area. Its proximity to the established communities of Finglas, Ashtown, Castleknock and Blanchardstown, together with its access to key transport corridors, positions the area to make a substantial contribution to meeting the future housing needs of the city.

In this context, the Office strongly welcomes the preparation of the draft Urban Area Plan in such a timely manner following the recent variation to the Fingal County Development Plan 2023-2029 (Development Plan), and it will be imperative that the plan facilitates development without delay.

Significant work has been undertaken by the Planning Authority in establishing a comprehensive framework for the area's development. In particular, the Office positively notes and supports:

- the promotion of transport-oriented, design- and residential-led development;
- the commitment to ensuring that community infrastructure is coordinated with residential development, including schools, childcare facilities and healthcare services, and the integration of such facilities within walkable neighbourhoods which will promote social cohesion and accessibility;
- the sensitive integration of the area's rich and distinctive built and natural heritage assets including the protected Dunsink Observatory, River Tolka corridor and Royal Canal into the overall vision for the area; and
- the creation of a new regional park on the site of the former landfill, which will provide a significant ecological, recreational and amenity asset for existing and future communities.

The Office also recognises the statutory requirement for the Urban Area Plan to be materially consistent with the Development Plan. While this places certain constraints on the options available to the Urban Area Plan, future reviews of the zoning framework may present opportunities to enhance connectivity, better integrate new and existing communities, maximise the role of Tolka Valley Regional

Park, and optimise the distribution of land uses in support of a more integrated and sustainable urban structure. Where relevant, these issues are highlighted in the submission below.

Having regard to the matters within the scope of the Urban Area Plan process, the Office has made three observations, including measures to improve connectivity, provide greater flexibility in residential densities during the initial phase of development, and to strengthen the Urban Area Plan's implementation and monitoring framework.

Subject	Recommendation	Observation
Connectivity	-	Observation 1
Density of Residential Development	-	Observation 2
Implementation and monitoring	-	Observation 3

2. Lands currently zoned for non-residential purposes in the Development Plan

The Office recognises that the Urban Area Plan has been prepared under section 71 of the Act, and that section 71(2) of the Act requires urban area plans to be materially consistent with the relevant development plan. It is therefore acknowledged that, at this stage, there is limited scope for the Planning Authority to depart from the zoning provisions set out in the Development Plan. This has, however, resulted in certain constraints or missed opportunities in terms of achieving a fully integrated new urban area that maximises the opportunities presented by the proximity to existing communities to the south (Castleknock) and west (Ashtown), and the DART rail corridor. This particularly relates to the lands currently zoned as High Amenity and proposed to be designated as Tolka Valley Regional Park; and the High Technology zoned lands between the Navan Road and the rail line at Dunsink south.

In relation to the High Amenity zoned lands, the commitment to the ongoing development of the Tolka Valley Park, building on the work of the Planning Authority in connecting the park westwards towards Blanchardstown with associated greenway linkages, is commended. However, the Office is of the view that strategic and limited rezoning for residential or mixed-use purposes should be considered,

particularly in relation to lands in proximity to the Ashtown train station / village centre which could support a compact and transport-oriented pattern of development, increase activity around the station, improve passive surveillance and make more efficient use of well-served lands.

A review of the zoning objectives would also allow for further consideration of the High Technology zoned lands in Dunsink South, between the Navan Road and the rail line. Given their accessibility to high-capacity public transport, these lands may also warrant further consideration for residential or mixed-use purposes.

As previously stated, the Office recognises that these matters lie outside of the current Urban Area Plan process, but requests that the Planning Authority gives full consideration to these views in terms of any future review of the zoning objectives.

3. Connectivity

The spatial strategy of the draft Urban Area Plan is designed to minimise through-traffic and to prioritise active travel and public transport. As a result, the Urban Area Plan seeks to provide a permeable and legible street hierarchy, supported by an integrated network of walking and cycling routes to ensure connectivity within Dunsink and to connect to surrounding communities including Ashtown, Castleknock, Finglas and Blanchardstown.

The proposed extension of the Luas, with the integration of a future Tyrrelstown Luas corridor through the lands, is a key component of the plan's connectivity and movement strategy. Within the Transport Strategy for the Greater Dublin Area (2022-2042), significant investment is also planned to upgrade the existing DART train line, which runs through the southern area of the site, under the DART+ West Programme. This will provide for high-frequency DART services through the electrification of the existing Maynooth and M3 Parkway rail lines.

Presently, however, there are limited proposed connections from the central development area (Dunsink West, Dunsink Central and Dunsink East) through the proposed Tolka Valley Regional Park to the DART train line. This has the potential for these development areas to be disconnected from these major public transport

services and existing residential communities to the south, with them being effectively enclosed by proposed park and recreational areas to the north and south.

Recognising the importance of protecting the amenity and biodiversity value of the park and encouraging active travel measures, further consideration should also be given to the opportunities for additional linkages, including potential vehicular/bus routes, between the proposed urban development and the extensive interchange facilities provided at the Navan Road Parkway train station, which also links back to the ongoing development of the former Phoenix Park Racecourse. By following a design-led approach, such connections could have the effect of both creating a more resilient and connected local transport network, and in a wider sense, presenting the Urban Area Plan as an extension of the built-up areas to the south such as Castleknock and Blanchardstown, as much as the areas of Ashtown and Finglas to the east/north.

Observation 1 - Connectivity

Having regard to connectivity and having considered:

- NPO 12 to ensure the creation of high quality and integrated communities that enjoy a high quality of life and well-being;
- NPO 38 for improved integration and greater accessibility in the delivery of sustainable communities;
- NPO 107 and NSO 5 of the NPF to reduce car usage and increase the number of journeys taken by sustainable modes;
- RPO 8.1 of the RSES to integrate transport and land use planning consistent with the guiding principles expressed in the transport strategy of the RSES;
- RPO 9.10 of the RSES to provide alternatives to the car and to prioritise and promote cycling and walking in the design of streets and public spaces; and
- the Climate Action and Low Carbon Development Act 2015, as amended, mandatory target to reduce greenhouse gas emissions by 51%, the Climate

Action Plan 2025 and associated actions including the National Sustainable Mobility Policy (2022) targets to reduce vehicle kilometres travelled per year and the National Investment Framework for Transport in Ireland (2021), the Planning Authority is advised to review the opportunities for further multi-modal connectivity between the development areas of Dunsink West, Dunsink Central and Dunsink East through the proposed Tolka Valley Regional Park to the DART railway line.

4. Density of residential development

The National Planning Framework First Revision (2025) sets ambitious growth targets for cities and metropolitan areas to 2040. The strategy for all cities is to support consolidation and intensification within and close to the existing built-up footprint of the city and suburbs area and metropolitan towns, and to support sustainable urban extension at locations served by public transport. The Sustainable Residential Development and Compact Settlements, Guidelines for Planning Authorities (2024) (Compact Settlements Guidelines) defines different area types and resultant density ranges within Dublin and its suburbs. In relation to City-Urban Neighbourhoods, such as Dunsink, it highlights that these highly accessible urban locations have good access to employment, education and institutional uses and public transport. It is stated in table 3.1 within section 3.3 of the Compact Settlements Guidelines that it is a policy and objective that residential densities in the range 50dph to 250dph (net) shall generally be applied in such urban neighbourhoods. Section 3.4 of the Compact Settlements Guidelines state that the density ranges set out in section 3.3 should be considered and refined, generally within the ranges set out, based on consideration of centrality and accessibility to services and public transport, as well as considering its character, amenity and natural environment.

The phasing map contained within the draft Urban Area Plan indicates three phases of development, with Phase 1 development located within parts of the Central Dunsink and Dunsink East development areas. In time, the proposed Luas extension to Tyrrelstown will run through these areas, and they will then be highly accessible central locations.

Section 12.2.1 of the draft Urban Area Plan indicates that the density of development within Dunsink East will range from approximately 75 to 200 units per hectare (net), with section 12.2.2 specifying that within Dunsink Central the anticipated density is to be within the range of 75 to 160 units per hectare (net). It is stated that the lower figure will relate to the first phase of development and that thereafter densities will increase to support public transport investment.

This approach appropriately reflects the objectives of the Compact Settlements Guidelines by seeking to balance the efficient use of investment in high-quality public transport with the objective of maximising access to these services for residents. The Office acknowledges the Planning Authority's commitment to achieving densities that support compact growth in these highly accessible locations.

The Compact Settlements Guidelines also, however, recognise that density outcomes should be considered in the context of placemaking, viability, housing delivery and the wider development of an area. In this regard, the Office considers that the approach could be strengthened by providing greater recognition of the practical realities of development delivery and the need for flexibility in how the target density range is achieved over time, and supporting the creation of a mixed tenures.

In particular, it should acknowledge that achieving higher densities is often an incremental process that requires the establishment of development momentum and market confidence, having regard to differing viability, financing and delivery constraints. Experience in the adjoining Ashtown/Pelletstown area demonstrates that allowing a range of densities during the early stages of development can successfully support the creation of a vibrant and sustainable community while facilitating the achievement of the intended overall density objectives across the wider area over the longer term.

The Planning Authority should therefore review how the density strategy is articulated, making it clear that the specified density range is intended to be achieved across the relevant sub-area or development phase as a whole, rather than as a minimum requirement for individual planning applications. Compact own-door houses schemes, which figure 3.1 of the Compact Settlements Guidelines indicates would have a density range c.50-100 dph, could therefore be given due consideration by the Planning Authority within this first phase of the development.

Observation 2 - Density of Residential Development

Having regard to the density of residential development and having considered:

- NPO 43 of the NPF in terms of prioritising homes in sustainable locations and at an appropriate scale of provision relative to their location;
- NPO 45 of the NPF to increase residential density in settlements;
- section 5.3 of the RSES in relation to the guiding principle of compact sustainable growth and accelerated housing delivery; and
- Policy and Objective 3.1 of the Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities (2024) in relation to densities and the recommended residential density ranges set out in section 3.3,

the Planning Authority is advised to review the provisions in respect of the density ranges for Dunsink Central and Dunsink East to provide greater flexibility and clarity regarding the density range for individual and early-stage schemes within the relevant overall density ranges.

5. Implementation and monitoring

As previously highlighted by the Office in its submission to proposed Variation No.1 to the Fingal County Development Plan 2023-2029, it is vital that the development of Dunsink is coordinated, infrastructure-led, and delivered in a planned and sustainable manner. This is particularly necessary given the number of stakeholders involved and the significant quantity of infrastructure which must be coordinated to deliver the plan in full, including public transport, roads, utilities as well as social and community infrastructure.

Notably, Uisce Éireann has indicated that there is currently capacity for 2,500 residents (phase 1) within Dunsink; however, any further growth would be dependent on the delivery of the Greater Dublin Drainage Scheme and the Water Supply Project. It is estimated that the Greater Dublin Drainage Scheme could be delivered by 2035 and the Water Supply Project does not currently have permission. The draft urban area plan acknowledges that, at present, much of the area falls outside of the

walking catchment for existing rail stations and high-frequency bus routes as well as the existing road network having limited capacity. The draft Urban Area Plan also recognises that the implementation of the Luas Tyrrelstown Extension may not be until after 2042. However, the Dunsink Central Development Area (predominantly phases 1 and 2) states that this will form the backbone of movement and activity. A number of other significant transportation infrastructure developments are indicated within the medium and long-term.

It is evident that the Planning Authority has undertaken extensive engagement with key infrastructure agencies, including the National Transport Authority (NTA), Transport Infrastructure Ireland, the Office of Public Works, Uisce Éireann and the Department of Education and Youth. In this context, the inclusion of a detailed phasing and implementation plan for the development lands, supported by indicative timelines and delivery mechanisms, would provide greater clarity and certainty to developers and the public. Similarly, setting out clear monitoring arrangements and review measures would support the Planning Authority in actively tracking progress and responding effectively as implementation advances.

Observation 3 - Implementation and Monitoring

Having regard to the need to ensure the timely and coordinated implementation and monitoring of all the supporting elements regarding the development of the strategic lands at Dunsink and having considered:

- Part 3, Chapter 6 of the Planning and Development Act 2024 with respect to Urban Area Plans;
- NPO 42 of the NPF to target the delivery of housing to accommodate approximately 50,000 additional homes per annum to 2040;
- NPO 43 of the NPF to prioritise the provision of new homes at locations that can support sustainable development;
- NPO 106 of the NPF to measure and monitor compact growth;
- NPO 108 of the NPF to monitor the implementation of the NPF;

- RPO 4.2 of the RSES in relation to aligning infrastructure provision with the phased delivery of all residential and employment development; and
- the NPF Implementation: Housing Growth Requirements (2025),

the Planning Authority is advised to set out the following in the Urban Area Plan:

- (i) a detailed phasing and implementation plan for the development lands, supported by indicative timelines and delivery mechanisms; and
- (ii) details of monitoring arrangements and review measures would support the planning authority in actively tracking progress and responding effectively as implementation advances.

6. Summary

The Office requests that the Planning Authority addresses the observations set out above.

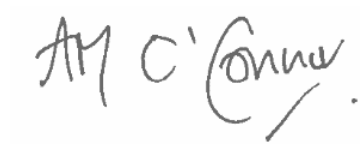
As part of this process, the Chief Executive's report to the elected members, prepared under section 75(9) of the Act, should summarise the Office's recommendations and outline how it is proposed to address them.

As soon as practicable, and no later than **four weeks** following the adoption of the Urban Area Plan, the Planning Authority is required to:

- provide the Office with a copy of the adopted plan,
- publish a copy of the adopted plan,
- inform the Office and the Minister where it has made the plan inconsistently with any submissions of the Office or Minister, including a statement of reasons for this decision; and
- send copies of any submissions received from the Minister, regional assemblies, and the NTA during the plan preparation process.

The Office looks forward to continued constructive engagement with the Planning Authority. If further clarification or discussion would be helpful, the Office would be pleased to assist and can be contacted at plans@opr.ie.

Is mise le meas,

A handwritten signature in dark ink, reading "AM O'Connor". The signature is written in a cursive, slightly slanted style. The "A" and "M" are connected, and the "O'Connor" part is also connected, with a small flourish at the end.

Anne Marie O'Connor

Deputy Regulator and Director of Planning Policy Implementation

Designated Public Official under the Regulation of Lobbying Act 2015
