

There very serious deficiencies in the National Planning Framework.

The plan will result in an exacerbation of the housing crisis in Fingal and is in direct contradiction of the government's own investment policy.

It undermines metro north and their own housing delivery plans in Fingal and if implemented as is will lead to dezoning of key strategic housing land in the fastest growing council area in the country.

Swords has been left out of the Dublin Metropolitan area. This will result a reduction from the current plan for swords of 1500 houses per year to less than 200 houses per year.

I want the government to drastically review the Plan, at the very least they need to include Swords in the metropolitan area but they also need to make drastic alterations to the Law to prevent the plan becoming a developers charter.

3 Key points which I would make following my reading of internal Fingal documents regarding the National planning Frameowrk.

1 : The National Planning Framework is low on detail of how housing will be delivered with no assessment of the implications of it's decisions. The way the National Planning Framework was presented means that it was extremely difficult for planners let alone lay people to interpret. Whether this was deliberate or because they hadn't considered the impact is open to question. However the Analysis both by Fingal and Regional assembly staff I have spoken to is bleak.

2; Fingal council officials have indicated believe that our annual growth in Swords would possibly be confined to 500 people and less than 200 houses per year until 2040!! Given that our current development plan is for 1500 houses per year in swords this is completely irresponsible of the National Planning Framework. There is no way we can deliver on the social housing required let alone the overall housing required under the current market structure under this plan. The NPF growth targets do not align with the Government's Rebuilding Ireland Action Plan and the projects facilitated by LIHAF.

3: Such low levels of growth will undermine the commercial viability of Metro North and are completely unworkable under the current Housing and Construction Market and we see no signs of Fine Gael radically changing the structure of the Market. The NPF is in it's current state unworkable and will result in an exacerbation of the Housing crisis in the fastest growing Local authority area in the country.

4: The current Market structure will make it next to impossible to deliver the required growth within the M50. Brownfield developments are historically far more difficult in practical ways to develop , and it will be far more difficult to prevent Land hoarding without significant market and even constitutional reform. There is no way to guarantee the levels of growth required without significant state involvement and even constitutional reform.

This plan is a disgrace for Dublin, for Swords and for Ireland. a Metro North will be completely undermined and key counties with Growth potential curtailed in favour of illusory housing potential both inside the M50 and elsewhere..

The reality is that the Government are treating Swords as if it was an isolated rural town with low organic levels of Growth potential instead of a Dynamic Key Component of the Greater Dublin conurbation and a Key part of the solution to the housing crisis.

It pays lip service to the M1 corridor but doesn't provide the growth figures to deliver it.

This plan if implemented It will have no flexibility. We will end up making the housing crisis worse. There is no plan on how to evolve . This is a big bang theoretical approach to a planning framework with complete disregards for reality.

If the Government is serious about revolutionary planning they need to institute massive Market reform to prevent land hoarding.This Planning framework can be described as a developers charter unless it is accompanied by immediate constitutional and legal reform to prevent brownfield land hoarding within the M50 and elsewhere.

I strongly argue that implemation of the Kenny reporting housing market reform needs to be a priority in order to avoid landowner profiteering hoarding and exploitation exacerbated by the NPF as currently framed.

I sit as a representative of Fingal county council on the Easter Midland and regional assembly and have been briefed by planning specialists within both organisations.

There is significant concern that the plan will result in a real threat to our economic Growth unless the plan or the entire Market structure is drastically altered.

this submission is a personal submission.

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