An Chomhairle Oidhreachta
The Heritage Council

Our Ref: DUAP_01

31 July 2026

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

Dear Sir/Madam

Re: Draft Dunsink Urban Area Plan

The Heritage Council was established in 1995 as a statutory body under the Heritage Act 1995 with a Council (the Board of the body) appointed by the Minister. The Heritage Council is a prescribed body under the provisions of the Planning and Development Acts 2000-2010 and S.I. No. 600/2001 of the Planning and Development Regulations, section 28 inter alia, in accordance with its functions under Section 6 of the Heritage Act, 1995. We seek to provide submissions on forward planning, development management and strategic infrastructure developments as they relate to Ireland's heritage, namely built, cultural and natural heritage.

The Heritage Council welcomes the opportunity to make a submission on the Draft Dunsink Urban Area Plan (UAP). We recognise the strategic importance of the Dunsink lands within the Dublin Metropolitan Area and welcome the publication of the draft UAP to guide the future development of the area.

The observations below focus on the contribution that archaeological, built, natural and cultural heritage can make to placemaking, civic life and the creation of a distinctive urban neighbourhood. While specific comments relate mostly to Chapters 7, 8 and 12, many recommendations should be considered as overarching principles throughout the Plan.

The most relevant policies from the Fingal County Development Plan 2023-2029 that are relevant for our comments are:

- Objective CSO31: *Prepare an Urban Area Plan….to enable sustainable regeneration and development of the area that is cognisant of, and sensitive to the significant historic buildings within the area including the nationally important architectural heritage site of Dunsink Observatory*
- Objective CSO32: *Support the designation of Dunsink Observatory as a UNESCO World*

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Heritage Site

- Policy GINHP13: *Support the development of the Fingal Ecological Network in line with the Fingal Biodiversity Action Plan.*
- Policy GINHP21: *Protect existing woodlands, trees and hedgerows which are of amenity or biodiversity value and/ or contribute to landscape character*
- Objective HCAO11: *Ensure that proposals for large scale developments and infrastructure projects consider the impacts on the archaeological heritage and seek to avoid them*
- Objective HCAO24: *Alteration and Development of Protected Structures and ACAs*

General Comment

The Heritage Council commends Fingal County Council for preparing a comprehensive framework for what will become one of Ireland's largest and most significant new urban communities. We particularly welcome the emphasis on using the existing landscape and heritage context to inform the approach to development, especially with regards to integrated green infrastructure; biodiversity protection and enhancement; high-quality public realm and placemaking; and a clear identification of the primary cultural heritage assets.

The recognition afforded to such features including the Tolka Valley, Royal Canal (pNHA), Dunsink Observatory (tentative World Heritage Property candidate site), as well as the several protected structures is strongly welcomed. Given the heritage resources within the Plan area, the Heritage Council believes heritage can play an explicit role in delivering the vision and strategic objectives and therefore provide the basis for developing distinctive neighbourhoods rooted in place and local character.

The Heritage Council considers that Dunsink presents an opportunity to demonstrate heritage-led placemaking, where the historic environment actively informs a new neighbourhood's identity, which captures the importance of the public realm and civic life from the earliest stages of urban design.

Vision and Strategic Objectives

We support the Plan's vision of creating a sustainable, connected urban community which respects its rich environment and heritage. The Heritage Council endorses the vision which acknowledges the role of heritage in shaping place identity. The natural and cultural heritage assets of Dunsink provide a unique basis for creating a sense of place.

We also welcome the prominence of heritage in the strategic objectives, particularly those relating to the protection and enhancement of biodiversity, and the protection and integration of built and natural heritage.

Spatial Strategy

We note the Plan's identification of *Development Areas*, particularly those informed by heritage

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features/attributes i.e. the Cultural Quarter and the Tolka Valley Regional Park. In addition, we believe that the map on page 20 has adequately identified the main heritage features in the spatial framework for the area.

New proposals in the cultural quarter, and those areas adjacent, will need to be strongly informed by the observatory and its setting, with particular regard to the potential Outstanding Universal Value (OUV) associated with its tentative UNESCO status.

In general terms, we believe that a truthful and credible expression through a variety of attributes can be deduced from the (potential) OUV for *The Historic Astronomical Observatories of Ireland* at this stage. This should inform the spatial strategy and key locational and design criteria (heights, lighting etc) for the development areas. We assume that Fingal has considered this. However, we would expect that section 4.2.4 of the spatial strategy would have had more detail, specifically on how the attributes of the potential OUV has informed the overall strategy, and especially the cultural quarter and proximate development areas (see further comment on Chapter 8 & 12).

The key factor for Fingal County Council on this matter is to ensure that it is not just the planning application stage that addresses OUV attributes, but rather than the entire spatial strategy has. We will discuss this further in our comments on subsequent chapters.

Chapter 7 - Green Infrastructure and Natural Heritage

The Heritage Council acknowledges the comprehensive Green Infrastructure Strategy and the emphasis on natural heritage e.g. the Tolka Valley, Royal Canal pNHA, Scribblestown Stream. There appears to be a strong emphasis on ecological connectivity. We consider this to be one of the strongest components of the Draft Plan and commend the nature led approach adopted throughout. In general terms, it appears that the location of the development blocks/areas have avoided the most ecologically sensitive sites within Dunsink and Scribblestown.

While we note the benefits, as described in the plan, that will emanate from the historic landfill site lands, in relation to biodiversity, recreation and drainage, we would highlight that any ecological value associated with this area is dependent on the maintenance and management regimes employed. We strongly recommend that this area is managed in the interests of nature, as far practical as possible. We recognise that Objective GI10 seeks to achieve this to some extent. We would recommend however to refer to 'management and maintenance' in the wording of this objective.

We also welcome the comprehensive analysis and the emphasis on ecological connections throughout the Plan area and beyond. The success of these connections, however, will depend on design quality and subsequent long-term management. This is needed to ensure ecological functionality and value. The Plan has captured this via objectives GI01, GI04, GI05, GI06, GI26, which when combined seek the retention of existing vegetation, mature trees and natural features.

Existing ecological assets provide value that cannot easily be replicated through replacement planting. Accordingly, before mitigation, enhancement, or biodiversity net gain is considered, the retention of existing natural features should be the first sequential step for how nature is managed

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in the development process. It would be beneficial for the natural heritage sections to be accompanied by a more detailed habitat map (based on Fossitt, J. 2000 *A Guide to Habitats in Ireland* Heritage Council) which includes key treelines and hedgerows, and other features (as per Table 5.3 of the Environmental Report)

We recommend that a survey of mature trees or stands of trees within the Plan area be considered with the view to identify specimens and groups suitable for Tree Preservation Orders (TPOs), a mechanism currently underutilised in forward planning.

Finally, we welcome the integration of archaeological features in the open space/landscaping discussion, as shown in section 7.6 of the Plan. This captures well the Heritage Council's view that people's attachment to place is strongly tied to the identity and heritage associated with it.

Chapter 8 - Archaeological, Architectural and Cultural Heritage

The Heritage Council welcomes the recognition afforded to cultural heritage within the Draft Plan. Furthermore, we consider that heritage is a primary placemaking tool and we welcome the compressive mapping of cultural and built heritage features on map 8.1. We also believe that there are comprehensive policies drafted that deal with the main architectural and cultural heritage considerations

The recent inclusion of Dunsink Observatory on Ireland's UNESCO Tentative List as part of the *Historic Astronomical Observatories of Ireland* highlights its exceptional architectural, scientific and cultural significance. The Plan affords the Observatory a volume of appreciation. This significance extends beyond the observatory buildings to encompass their wider landscape setting, views, historic approaches and scientific associations. We welcome the discussion on the potential OUV as described in Section 8.3.2.1.

The Draft Plan does have policies that require development proposals to assess impacts on the UNESCO site at Dunsink Observatory (AACH09, AACH12 and AACH13). Of particular interest to us is AACH12 and the supporting text (section 8.3.3.3).

Significant advancements have been made in the type of assessment required for such UNESCO sites through specific heritage Impact assessment guidance and methodology. The Heritage Council has made recent submissions to this effect[1]. We therefore make the following points.

With regards to section 8.3.3.3, there is a need to ensure that some of the design considerations discussed in these paragraphs reflect the attributes of authenticity of the potential OUV. The latter, while highlighted in AACH12, is not discussed in this section within the context of some of the key design considerations.

Secondly, we recommend that objective AACH12 may need to make specific reference to the need for a Heritage Impact Assessment (HIA) for proposals that may impact on the potential OUV, as

[1] https://www.eplanning.ie/KerryCC/AppFileRefDetails/2561044/0
https://www.eplanning.ie/LouthCC/AppFileRefDetails/2460766/0

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opposed to 'due regard'.

The local authority may wish to consider if there is merit in having the spatial strategy of the plan undergoing a HIA at this stage, which may provide an overall assessment as opposed to individual developments. We acknowledge that a strategic environmental assessment has been undertaken for the UAP, however the strategic environmental objectives (Table 6.1 of the accompanying environmental report) should have the potential OUV of the tentative UNESCO site as a key objective under the cultural heritage heading. We contend that a full understanding of OUV through HIA is the primary method of assessment of development impacts on (candidate) world heritage properties.

Urban area plans are forward plans and are a new form of plan under the Planning and Development Act 2024. Their scope is more masterplan related and a HIA of OUV at the strategic level of the Plan may be prudent as opposed to relying on individual applications. We recommend liaison with the National Monument Service on this point.

Finally, we welcome the provisions under Section 8.4.6 on Traveller Culture which correctly recognises the significant intangible and physical cultural contribution the community makes to the area.

Chapter 12 - Urban Design Framework

Besides our specific comments on the natural and cultural heritage chapters, heritage in a general sense should inform the design approach to places and spaces. Key heritage features should be the anchor of which good design pivots. Primary of place of protected structures, and the setting of important cultural features should direct and inform the design rationale.

We make the following points on specific development areas:

Dunsink East – This part of the plan area has the most comprehensive network of mature hedgerows and tree lines that appear to follow long established field margins. These should be incorporated as far as practical into the layout of the development blocks.

Dunsink Central – Design proposals to the north of this area need to strongly consider the attributes of the (potential) Outstanding Universal Value of the *Historic Astronomical Observatories of Ireland*

Dunsink West – We welcome how the spatial framework has identified Elm Green House as a key feature. This should be the anchor feature in the area – the development blocks and planting should amplify the appreciation of the building's setting and its primary elevations.

Cultural Quarter – the discussion of this area (section 12.2.4) should have a greater emphasis on the attributes of the (potential) Outstanding Universal Value to understand how this specific heritage asset informed the aspirations for the area. The potential OUV of the candidate site should be the primary consideration for the approach to development and the key development objectives. We would re-emphasise our point here that OUV is not an 'additional consideration' for proposed development but also fundamental to the plan making exercise.

Dunsink South – there is inadequate reference to the Royal Canal as a proposed Natural Heritage

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Area in the discussion and the objectives for this development area. How this natural heritage asset is protected, in terms of suitable buffer distances, is a key consideration for any development near the south bank. We recommend an objective for this feature within this section.

Tolka Valley Regional Park – We strongly support the policy provisions in this section as described.

Conclusion

We welcome the preparation of the urban area plan for Dunsink. We have highlighted the importance of heritage not just at an individual policy level but at the strategic level for the future development of this new community. This should be recognised in the plan to ensure that development requirements are achieved in a manner that protects and enhances heritage and the environment.

We trust these recommendations will be considered as the local authority pursues this plan.

Yours sincerely

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Virginia Teehan

Chief Executive Officer

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