

Chief Executive's Office

NPF Submissions
Forward Planning Section,
Department of Housing, Planning, Community and Local Government,
Custom House,
Dublin D01 W6X0.

9th November 2017

RE: Submission on Draft National Planning Framework 'Ireland 2040 – Our Plan'

Dear Sir/Madam,

South Dublin County Council (SDCC) is pleased to contribute to the consultation process for the National Planning Framework (NPF), 'Ireland 2040 – Our Plan'. SDCC previously made a submission at pre-draft stage of the NPF process which sought to highlight the contribution to date and future potential of South Dublin County to the sustainable development of the Dublin City region. The preparation of the NPF is an opportunity to harness the dynamism of Dublin City's growth but direct this in a more sustainable fashion in the future. This will require the NPF to incorporate the relevant inputs from appropriate spatial and sectoral plans. Crucially the NPF will need to be supported by the relevant governance structures and funding mechanisms to deliver and implement the National Policy Objectives (NPOs) and the National Strategic Outcomes (NSOs) in an integrated and, crucially, timely fashion.

1. Draft National Planning Framework (draft NPF)

The draft NPF provides a welcome emphasis on quality of life and the significant role of planning in delivering this. The draft NPF also recognises the importance of place and place making. SDCC supports this approach, which is emphasised in our own functions and projects.

SDCC welcomes and supports the following aspects of the draft NPF:

- **Strategy for Dublin:** The elements of the draft NPF as they relate to Dublin set out in Section 2.1. It is vital that the continued growth and success of Dublin, as the primary city and the arguably the only city in Ireland, competing on a global level for jobs and investment.
- **Urban Centres:** The recognition given to urban centres as multi-functional places at the centre of communities as set out in Section 3.2 and NPO 4.
- **Location of Enterprise:** The importance given to identifying locations where enterprises can access competitively priced development lands, utilities and commercial properties to the highest standards available internationally and associated criteria detailed in Section 3.7.
- **Compact Urban Development:** NPO 3a sets a target to provide 40% of all new homes nationally within the built-up envelop of existing urban settlements. NPO 3b set the expectation that at least half (50%) of all new homes in Dublin, Cork, Limerick, Galway and

Waterford and immediately adjoining suburban areas within the built up envelope of existing urban settlements.

- Smart Growth Initiative: NPO 7a introduces the 'National Smart Growth' initiative to support both urban and rural areas as set out. Measures such as this are vital if the potential of places is to be realised.
- Student Accommodation: Section 5.7 "Housing" makes specific reference to demand for student accommodation. Adequate provision of purpose built and managed student accommodation is necessary both in terms of reducing impact on pressure for family housing and enabling centres of education to grow student numbers. Locating student housing proximate to centres of education, measured by journey times where public transport serves the centre of education is a robust policy position.
- Climate Change Mitigation: NPO 55, 56 and 57 align the draft NPF with the key policy positions outlined in National Mitigation Plan and the National Climate Change Adaption Framework, thus placing the national response to climate change at the heart of national spatial policy.

2. Issues for Consideration

SDCC, in the interest of being constructive, draws attention to a number of issues which require further consideration and clarification prior to finalising the NPF. These issues set out below.

2.1 Population Projections

SDCC is seeking clarity in relation to the proposed draft NPF spatial distribution, the proposed population projection for "Dublin City and Suburbs" and the impacts upon the South Dublin County Development Plan 2016 – 2022 (the Development Plan) and its Core Strategy. Table 2.1 of the draft NPF, identifies Dublin City and Suburbs as having a population of +265,000 people by 2040. This equates to an average of 11,000 dwelling units per annum being distributed across the four Dublin local authorities¹. The Development Plan states that SDCC has a housing yield of 41,143 units. This translates to capacity for 4,751 units per annum up until 2025. It is respectfully submitted that SDCC housing target allocation arising from the NPF, if rigidly adhered to, will limit SDCC potential to meet its Development Plan housing targets up to 2015.

Furthermore, the Adamstown and Clonburris Strategic Development Zones (SDZ's) and Kilcarberry Site are (3) three of (20) twenty sites that have been designated as Major Urban Housing Development Sites (MUHDS) by the Minister for Housing, Planning and Local Government (the Minister). The MUHDS sites are a key element of the Minister's national response to requirement to deliver thirty thousand (30,000) new homes in the next (3) three to (4) years. The Minister has also made a commitment under the Local Infrastructure Housing Activation Fund (LIHAF) to provide c€30m at the (3) three locations, to fund key pieces of strategic infrastructure to unlock their development potential. Where public money is being used to secure the development of strategic lands through LIHAF or other schemes, it is essential that the targets contained in the NPF do not compromise this investment.

2.2 Mapping/Terminology

The draft NPF would benefit from a clear map based definition of the extent of the spatial Dublin region and its implication for local and regional government administrative boundaries. This gives rise to the following issues:

¹ This assumes that this relates solely to the area of the Dublin Local Authorities.

- The definition of the Dublin City Region is defined as the commuter catchment from which at least (15) fifteen % of the relevant city area workforce is drawn. This would best be illustrated in map form.
- The 'Greater Dublin Area' (GDA) has been defined as the metropolitan area identified in the National Transport Authority (NTA) *"Transport Strategy for the Greater Dublin Area 2016 – 2035"* unless otherwise agreed with the DHPLG. In the interest of clarity, the NPF would benefit from the inclusion of a map clearly illustrating the extent of the GDA.
- A definition of Dublin City and Suburbs (DSS) should be provided. In the interest of clarity, the NPF should include a map which indicates whether the DSS refers to the (4) four Dublin Local Authorities or is it the Metropolitan Area as described and identified in the *"Regional Planning Guidelines for the Greater Dublin Area 2010- 2022"* (the RPGs).
- The NTA *"Transport Strategy for the Greater Dublin Area 2016 – 2035"* defines the "Metropolitan Area" based upon the RPGs i.e. *"Dublin City, its immediate suburbs and the built-up areas outside of Dublin City centre including a number of proximate major existing towns which are strongly integrated and connected with the built up area of Dublin."* It is arguable that it is timely to review this definition of the Metropolitan Area, particularly in light of the approach in the draft NPF to urban consolidation and given that this Metropolitan Area extends into adjoining counties rather than focusing on the built up area of Dublin city itself.

2.3 Availability of Growth Projections

Reference is made to the ESRI projections which support the development approach proposed in the Draft NPF. Table 2.1. of the draft NPF includes a broad spatial distribution of population across Ireland based on the ESRI projections. It would be highly informative if the background analysis in this area was also published. It is not clear how the growth targets in the draft NPF compare to existing development trends i.e. how much extra growth will need to be directed towards the regions over and above the existing trends. In the event that core strategies need to be amended following the adoption of the NPF, it is important that the evidence base, namely this background data, for these decisions is available.

2.4 Urban Employment Growth

Section 3.7 states that it is important to *"identify locations where enterprises can access competitively priced development lands, utilities and commercial properties to the highest standards available internationally"*. The same section also outlines the criteria for consideration in accommodating future strategic employment growth at regional and local level. Notwithstanding these criteria, the proposed future spatial distribution of jobs in the Eastern and Midland region is unclear. The NPF should indicate on a spatial basis the broad locations for future strategic employment growth. In particular, the characteristics which influence the location of employment and attract Foreign Direct Investment (FDI) should be integral to an evidence based approach relating to the location and distribution of employment and jobs.

2.5 Housing Need and Demand

Section 5.7 sets out detailed requirements for planning authorities in respect of assessing housing need and demand. The NPF acknowledges that this is venturing into the area of economic forecasting and expanding the traditional boundaries of Development Plan forecasting. It is vital that adequate guidelines are provided to planning authorities in this area.

The inclusion of data on vacancy would lead to more informed core strategies and a more targeted approach to brownfield and infill development is welcomed. Currently, survey data on vacancy is not readily available. However the efforts by the Minister to address this issue are welcomed. Circular PL7/2017 outlines a robust roadmap and methodology for the preparation of SDCC's Vacant Homes Action Strategy. Similar guidance is warranted in relation to economic forecasting to inform the preparation of Development Plans.

2.6 Resource Efficiency and Transition to a Low Carbon Economy

The NPF should emphasise the increasing role of urban and peri-urban counties in addressing climate change mitigation. It is increasingly recognised that urban and peri-urban local authorities require an evidence-based response which captures a spatial understanding of the existing energy profile across sectors and land uses that can be used as a baseline to understand and consider future energy scenarios to 2030 and beyond. As such, there is a recognised need to build on spatial planning tools and strategies, starting with the Development Plan energy policies, focusing on more evidence-based and spatially appropriate energy and climate change mitigation policies, objectives and implementation measures.

2.7 Implementation

SDCC emphasised the need for effective monitoring and implementation measures in its pre-draft submission and reiterates the need for the NPF to be effectively implemented.

Section 9.1 sets out how implementation will be guided by targeting 10 NSO including:

- Compact, Smart Growth;
- Enhanced Regional Accessibility;
- Sustainable mobility; and
- Transition to a Low Carbon and Climate Resilient Society.

Many of these NSO lend themselves to measurable targets. However, no targets have been set down in the draft NPF. It is critical that metrics are used to gauge success and enable the adaptation of the NPF or subsidiary documents as required. Thus, it is recommended that the NPF contain the following measurable NSO:

- percentage of new housing/commercial delivered on brownfield lands,
- travel times particularly by public transport across the regions,
- transport emissions,
- changes in modal shift,
- journey times to work etc.

It is recommended that the Office of the Planning Regulator (OPR) as part of its function develop the measurable NSOs.

2.8 Office of the Planning Regulator

Section 9.2 of the draft NPF, states that the OPR will monitoring of the implementation of the NPF. It would be helpful if the governance arrangements and responsibilities for the implementation of the NPF were clearly outlined. In particular the role and responsibilities of the DHPLG, the OPR, regional assemblies and local authorities.

2.9 Metropolitan Area Strategic Plans

The proposal to prepare metropolitan area strategic plans (MASPs) will enable a more focused approach to be taken to the development of the cities in the country. SDCC agrees that such documents need to have statutory footing to enable more effective implementation. However, the

alignment of these with higher and lower tier spatial planning documents will be critical. Regional Spatial and Economic Strategies (RSES) will need to ensure that objectives in the MASP will not be inhibited by objectives in RSES or lower tier documents. There will also be a need to ensure that development trends in other areas will not mitigate against achievement of the MASPs.

SDCC recommend that greater clarity is provided in relation to who is responsible for the preparation of the MASPs. In order to avoid creating another layer of structures, it is recommended that Regional Assemblies would take the lead role in coordinating and preparing MASPs based upon the existing RSES model which cross multiple planning authority boundaries.

2.10 Implications for Development Plans

The introduction of core strategies has significantly assisted in taking a focused approach to the identification and prioritisation of residential zoned land; the first step in active land management. The preparation of standard guidance in this area, to build on existing Departmental advice, is welcomed.

There are concerns on the emphasis given to landholder commitment in NPO 68. A landowner agreement should over-ride other planning considerations. If an area of land in question represents the best location to cater for the future growth of a settlement, the planning process should use every means to secure the release of that land, including the vacant sites levy and compulsory purchase order. The commitment given to the use of compulsory purchase order (CPOs) in NPO 12 and 68 and in Appendix 2 is welcomed. In light of the approach to CPOs elsewhere in the draft NPF, SDCC would caution against the inclusion of the reference to landowner co-operation in NPO 68. It is recommended that the Minister identifies and ring fences a budget to fund planning authorities CPO of lands in order and to secure the development of priority zoned lands.

The approach to zoning and prioritisation in Appendix 1 and 2 requires careful consideration. At face value there is considerable scope for confusion between definitions, tiered approaches versus priority approaches and the very real possibility of limiting supply and eliminating "Headroom" if a rigid approach is taken. The potential time lags in infrastructure provision, progressing land management resolutions, including CPO procedures etc. suggests the need to avoid the potential contentions around "leapfrogging" and spurious objections related to priority definitions.

The draft NPF has significant consequences for the preparation of Development Plans, particularly in the absence of RSES and the requirements in respect of housing need and demand analysis. It is vital that guidance on this is made available as a matter of urgency.

2.11 State Lands

The rationale for coordination and land use strategies with regard to State owned lands is laudable. The extension of this to central management and the apparent suggestion of using land sale proceeds to create a "rolling fund" requires much greater clarity so as not to infringe on the rights, obligations and corporate considerations that arise in relation to local authority owned land.

2.12 Rural Development

It is important that the draft NPF has recognised that there is diversity of rural areas and the focus on the renewal and development of small towns and villages is welcome. However, there is a lack of detail provided on the broad geographical distribution of the rural areas. It is recommended that mapping is provided to inform the spatial extent of these areas.

NPO 14 applies a target population growth rate for small towns and rural areas. SDCC has concerns regarding the implication of the application of this approach and objective would mean for South

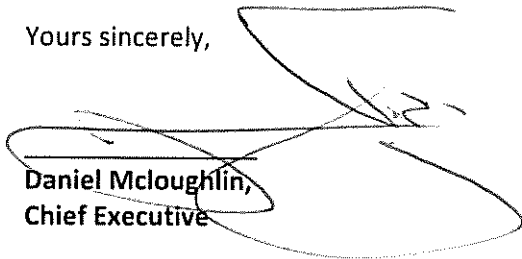
Dublin having particular regard to the natural and landscape sensitives and the landscape capacity. The rural area in the South Dublin, similar to other rural areas, serves as a valuable resource in ecological, social, environmental, recreational, tourism and economic terms which need to be protected and enhanced. The rural areas adjacent to cities and large towns have a strategic role and represent areas for future urban expansion. The NPF needs to provide a policy response, which ensures that the short term pressures do not mitigate against the integrated development of such lands for future urban expansion.

3. Conclusion

The NPF recognises the strategic role of Dublin in the future development of the country. As the only city of global scale in Ireland and given that it competes on a world level for inward investment, it is vital that this role is supported. In this regard, SDCC specifically welcomes the support given in the draft NPF to measures which enable this, including the sustainable development of greenfield areas on public transport corridors for housing such as Adamstown and Clonburris, delivering key rail, bus and cycle transport projects, developing accessible locations for significant people-intensive employment, investment in water services, enhancing accessibility to Dublin airport and facilitating the growth of Dublin Port.

It is respectfully requested that the issues raised in this submission will be taken into account in finalising the draft NPF. Please do not hesitate to contact me if you require any clarification or further information in respect of the issues raised.

Yours sincerely,



Daniel McLoughlin,
Chief Executive