

Eastern & Midland Regional Assembly,
3rd Floor North,
Ballymun Civic Centre,
Main Street,
Ballymun,
Dublin 9,
D09 C8P5.

16 February 2018

**Submission on the Eastern & Midland Regional Assembly Regional Spatial and Economic Strategy
“Initial Public Consultation & Stakeholder Consultation Issues Paper” (November 2017).**

Dear Sir or Madam,

South Dublin County Council (SDCC) welcomes this opportunity to contribute to the preparation of the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES) and the Dublin Metropolitan Areas Strategic Plan (MASP).

Dublin future economic growth is dependent upon continuing to compete on a global level for inward investment. SDCC has a key role to play in the attraction of foreign direct investment. However, the manner of this development must be delivered in a plan led and evidenced based manner through efficient resource management in order to promote environmental sustainability and social and economically cohesive communities.

SDCC planning policy sits within a hierarchy and framework of spatial plans at national, regional and local level. The National Planning Framework (NPF) “*Ireland 2040 Our Plan*” is being finalised by Government and will replace the 2002 National Spatial Strategy (NSS). The NPF is the overarching spatial instrument under which sits the Eastern and Midland Regions (EMR) RSES.

The EMR RSES designates SDCC as part of the Dublin Strategic Planning Area (SPA). The Dublin SPA, as part of the RSES, will replace the Regional Planning Guidelines for the Greater Dublin Area 2010-2022 (the RPGs). SDCC is also situated in the Dublin MASP which will be prepared concurrently with the RSES. The role of the RSES is to coordinate the implementation of the NPF at local government level in the EMR through planning policy delivered through development plans, strategic development zones and local area plans.

The preparation of the RSES, the Dublin MASP and Dublin SPA provides an opportunity to manage the sustainable growth of the Dublin SPA. This will require the coordination of the hierarchy of spatial plans (NPF, the RSES, Dublin MASP and Dublin SPA) across Government Departments and sectoral plans to implement opportunities for economic development in an integrated and timely fashion.

SDCC is a key actor in delivering housing and employment opportunities in the Dublin MASP and SPA. SDCC has a key role in coordinating and creating the conditions for the robust spatial delivery of sustainable land use and transportation measures. The current “*South Dublin County Council Development Plan 2016-2022*” (the Development Plan) is SDCC the key planning document in this regard. The Development Plan is underpinned by the following strategic policy considerations which are also relevant to the RSES, Dublin MASP and Dublin SPA:

- a) “*Quality of life, with an emphasis on key economic, environmental, social and cultural indicators;*

- b) *Prosperity, with an emphasis on contributing to a competitive business environment that supports economic development, job creation and prosperity for all;*
- c) *Sustainability, with an emphasis on making better use of key resources such as land, buildings, water, energy, waste and transport infrastructure;*
- d) *Health and wellbeing, by facilitating active and healthy lifestyles with increased opportunities for walking, cycling and active sport and recreation;*
- e) *Social inclusion, with an emphasis on creating socially and physically inclusive neighbourhoods, taking account of the recommendations of The National Disability Strategy Implementation Plan 2013-2015 and Inclusion Ireland's Changing Places campaign; and*
- f) *Climate change adaptation, with increased emphasis on reducing climate change at a local level through settlement and travel patterns, energy use and protection of green infrastructure".*

SDCC's submission is concerned with the future sustainable development of SDCC as of part of the wider national and regional spatial planning context. This submission has been prepared to respond to the issues raised in the "*Regional Spatial and Economic Strategy Initial Public Consultation & Stakeholder Consultation Issues Paper*" (the Issues Paper) published by EMRA in November 2017. In the interest of clarity, SDCC response is structured as follows:

- 1. General Issues for consideration;
- 2. Response to the ten (10) key questions identified in the Issues Paper; and
- 3. Conclusion

1. General Issues for Consideration

a) Metropolitan Area Strategic Plans

The draft NPF provides for the preparation of MASP for Dublin and four (4) other cities of Cork, Galway, Limerick and Waterford. The preparation of MASPs will enable a more focused approach to be taken to the development of cities.

It is critical that the RSES, the Dublin MASP and Dublin SPA are mutually consistent. The MASP must be a focused, specific and concise. The Dublin MASP will utilise the established Dublin metropolitan area boundary as set out in the RPGs. The MASP should give effect to the strategic policy of the RSES at a more specific spatial level. This can be achieved by identifying and supporting development plan core strategies which identify specific growth areas based upon the RPG designations. In the case of SDCC Core Strategy, this includes the consolidation of areas within the Dublin Gateway (including Palmerstown, Naas Road, Terenure, Templeogue, Rathfarnham, Ballyroan, Knocklyon, Firhouse, Ballycullen, Ballyboden and Edmondstown), the promotion of development within: (a) Metropolitan Consolidation Towns of Lucan, Clondalkin (including Adamstown and Clonburris SDZs) and Tallaght, (b) emerging Moderate Sustainable Growth Town of Saggart-City West; and (c) the Small Towns of Newcastle and Rathcoole.

It is critical that there is a robust top down approach to spatial planning policy. The NPF should clearly inform the RSES, the Dublin MASP and the Dublin SPA which in return will be given effect through SDCC Development Plan, SDZ Planning Schemes and local area plans. This approach will ensure clarity around economic and spatial planning policy from national to regional to local level. The MASP should also identify the infrastructure required to secure housing and jobs in accordance with development plan core strategies. This coordinated approach will ensure that Exchequer funding can be directed through initiatives such as the Local Infrastructure Housing Activation Fund (LIHAF) to locations where it can maximise a return on State investment.

b) Population Targets and Household Allocations

SDCC submission on the draft NPF highlighted issues associated with the population projections contained in the draft NPF and their implications for the population targets contained in the Development Plan Core Strategy. The draft NPF identified an average of eleven thousand (11,000) housing units per annum being distributed across the four Dublin local authorities¹. The Development Plan Core Strategy contains a housing target for four thousand seven hundred and fifty one (4,751) units per annum up until 2025. If rigidly adhered to, the housing target allocation arising from the draft NPF, would limit SDCC potential to meet its Development Plan housing targets up to 2025. The final NPF needs to clarify this issue and be accurately reflected in the RSES and Dublin MASP and Dublin SPA.

The bulk of SDCC housing capacity is shared between the Adamstown and Clonburris SDZs and lands identified for brownfield regeneration close to existing town centres, such as in Tallaght and on high quality public transport routes, or other large scale, high quality land parcels. The Adamstown and Clonburris SDZ's and Kilcarberry Site are three (3) of twenty sites (23) 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 response to addressing the requirement to supply thirty thousand (30,000) new homes by 2022. The Minister has also made a commitment under LIHAF to provide approximately €30m to fund key infrastructure at the three (3) MUHDS locations in SDCC. 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 and filtered down through the RSES do not compromise this investment. Similarly, the importance of the MUHDS should be recognised in the RSES, Dublin MASP and Dublin SPA.

c) Terminology

The draft NPF utilised a number of terms in describing Dublin and the adjoining area, including:

- Greater Dublin Area;
- Dublin City Region;
- Dublin City and Suburbs; and
- Metropolitan Area.

SDCC, in its draft NPF submission identified that there was a lack of clarity provided around some of this terminology with definitions either not provided or cross referenced and a lack of mapped representations of these areas. It is recommended that the RSES, in the interests of clarity, maps, rationalises and clarifies the above geographical definitions.

d) Review of RPGs

SDCC welcomes the publication of the Issues Paper and the accompanying "*Initial Evidence Base and Socio Economic Profiles*" (Socio Economic Report). However, it is noted that the Issues Paper does not contain any assessment or review of the RPGs. The preparation of the draft NPF benefitted from the input of an Expert Review Group² which examined the implementation of the NSS. A similar exercise for the RPGs would be beneficial in terms of assessing the success in implementing the RPGs with a view to enhancing, where necessary, the approach to be taken in the forthcoming RSES. In the absence of such a review, inferences regarding the success or otherwise of the RPGs can only be made by examining statistical data contained in the Socio-Economic Report.

2. KEY QUESTIONS DETAILED IN CONSULTATION ISSUES PAPER

i. How can we align the location of population growth, employment and housing, by 2030?

¹ This assumes that the figure of 265,000 additional people in Dublin City and Suburbs by 2040 relates solely to the area of the four Dublin Local Authorities.

² (<http://npf.ie/wp-content/uploads/2017/02/EXPERT-GROUP-SCOPING-REPORT-JAN-2014.pdf>).

The Socio Economic Report highlights the mismatch between living and working in the EMR. It notes that *“The long-term trend is for residential development moving further outwards from Dublin, with significant growth in many of the small towns and villages in the peri-urban area surrounding the city.”* The RSES must set in place robust policies and a development strategy to address this trend.

Dublin City is the main centre of employment in the Region and State. As the National Capital and only City in the Country to truly compete on a global scale for inward investment, it is likely to continue to be the first choice location for major new economic development. The emergence of a spatial clustering effect in economic development has been observed and should continue to be encouraged in order to maximise synergistic effects. This approach should be coordinated at a regional level. It is important that the planning system contributes to creating the conditions to attract economic development to suitable areas which are already serviced and which can maximise the use of existing resources. It is important that land use and transport integration is promoted in economic development in which people intensive industries are directed in the first instance to locations which are served by public transport. The jobs of the future also need to be located close to residential areas to reduce the need to travel.

SDCC is already addressing this issue. The Grange Castle Business Park is a strategic employment site in close proximity to existing major residential areas and the two (2) SDZs, Adamstown and Clonburris, where significant new residential development will be provided. Thus providing the opportunity for people to live and work in close proximity.

The Development Plan includes a zoning objective *“REGEN”* which seeks *“To facilitate enterprise and/or residential led regeneration”* on underutilised industrial lands proximate to town centres and/or public transport nodes. The Tallaght Town Centre Local Area Plan (LAP) is currently being prepared. This LAP includes a significant area of land with zoning objective *“REGEN”* adjoining Tallaght town centre which already benefits from a clustering of employment uses (SDCC County Hall and Library, Tallaght Hospital, the Institute of Technology Tallaght, The Square Tallaght, retail and business services). The Tallaght LAP has the potential to create the conditions for an intensification of commercial and residential uses by building on the existing employment and enterprise cluster supported by the availability of the public transport (LUAS and bus services). The MASP should recognise Tallaght and Grangecastle as regional centres for employment and enterprise.

Dublin will continue to be Ireland’s most attractive destination for future employment. It is an imperative the RSES housing policy prioritises the supply of homes in the city and suburbs. The corollary of this policy position is that housing growth in the Eastern and Midland SPAs must be managed so as to mitigate against the exacerbation of commuter led development and ensure that Dublin operates effectively. As well as having quality of life implications, extensive commuter led development in the Eastern and Midland SPAs has negatively impacted on the viability of public transport provision and through increased greenhouse gas emission on the environmental quality of urban Dublin. Non sustainable commuter patterns characterised by short private car trips mitigate against the role of strategic transport corridors (i.e. M50, N4, N7) in the efficient movement of goods and services at a national and regional level.

The supply of housing in the Dublin MASP and Dublin SPA must be driven by evidence based realistic targets. The housing targets for the Eastern and Midland SPAs must also be based on sustainable derived growth rates. Crucially, support will be required at national level in terms of active land management measures (e.g. MUHDS designation, LIHAF investment) in order to ensure the release and development of lands identified for housing in the Dublin MASP and Dublin SPA, in a timely manner in order to encourage brownfield development and urban renewal. There must be a move away from the extensive greenfield development which has occurred to date in the Eastern and

Midland SPAs. The draft NPF targets for urban consolidation can only be achieved through this policy approach.

Government policy in respect of housing affordability is also a factor in influencing the demand for commuter led development. The Eastern and Midland SPAs have supplied cheaper housing notwithstanding the fact that the outcome of this spatial planning approach brings significant social and environmental costs. Development plan core strategies represents a clear and evidence based approach to the zoning and prioritisation of residential zoned land.

There needs to be an evidence based approach for commercial/industrial zoning lands. Employment location has a major impact on travel patterns, quality of life and urban form. To ensure the effective prioritisation of scarce resources a sequential approach to employment zoned lands should be taken in addition to an evidence base for the quantum of zoning. The sequential approach would also counter the 'donut' trend of hollowing out of commercial operations from town/city centres to suburban locations with poor public transport provision.

ii. How can we plan for healthier and more attractive places?

Planning for healthier and more attractive places requires appropriate decisions being made at the macro and micro level. At a macro level, sustainability and quality of life objectives means that housing must be provided adjacent to jobs and other supporting community facilities such as colleges, schools, healthcare and retail. The RSES should focus delivery of new homes and jobs in the Dublin MASP and Dublin SPA in the first instance. The RSES should emphasize the consolidation of built up areas rather than expansion of Dublin City region into the Eastern and Midland SPAs. The RSES should take a regional approach to strategic green infrastructure and landscape characterisation.

At a micro level, creating healthy and attractive places means building mixed use and mixed tenure communities, developing places which will reduce the need to travel and facilitating short journeys by foot or cycling or public transport. The RSES should include policy priority on the importance of spatial planning in delivering place making and enhancing the public realm. The RSES should also contain policy which seeks to balance development needs with the protection of biodiversity, ecology and recreational amenity.

iii. How can we balance the economic, environment and social dimensions for a better region?

The RSES will be subject to a robust Strategic Environmental Assessment (SEA). The SEA process will ensure the RSES integrates economic, environmental and social considerations.

The Issues Paper recognition that *"Our land is our key asset"* and a finite resource is welcomed. The Issues Paper also highlights that Fáilte Ireland has identified that Ireland's landscape is the key driver for the promotion of Ireland's tourism. The RSES land use strategy should focus on minimising the development of greenfield land. This can be achieved by promoting the renewal and consolidation of existing brownfield urban areas at appropriate densities. Agricultural land must be protected, in terms of food security and protection of the rural economy as well as in the interests of green infrastructure. This policy position applies to land under threat from dispersed rural housing as well as greenfield expansion at the edge of towns and villages.

The Issues Paper states that there remains a demand for single dwellings in *"rural parts of Kildare, Meath, Fingal and beyond"*. It should be noted that SDCC also experiences the pressure for development of single houses in its rural areas which includes the Dublin Mountains. The Issue Paper states that *"In some instances, the rapid growth of small settlements has resulted in development at a scale and pace that has challenged the capacity of services and has led to requirements for new infrastructure, facilities and services, and a resulting impact on the local environment."* The RSES must

have a robust and clear settlement strategy which does not facilitate such an approach in the future. Residential development must be directed to environmentally sustainable locations supported by infrastructure.

iv. How can we address regional disparities for more balanced regional development?

The Socio Economic Report illustrates a wide variation in terms of economic opportunities and social advantages across the EMR. The RSES is an economic and spatial planning strategy document and thus has a limited ability to directly address all types of disadvantage. The RSES should focus on areas where it can have most impact. The RSES will cover the next twenty (20) years during which time levels of economic growth are likely to fluctuate. Thus the RSES needs to contain a robust policy position which can be modelled and tested against the full economic cycle of growth, decline and recovery. The RSES strategy should be about recognising the potential and capacity of an area to support future population and employment growth. In doing so, the RSES should identify that some areas of the EMR have greater potential than others to do so. It may not be desirable for some areas, particular rural areas of the Eastern and Midland SPA to expand greatly in terms of population. Thus it may not be realistic to achieve balanced development across the EMR. However, the RSES should support existing communities and areas to reach their potential.

v. What are the key strategic natural assets we need to protect?

The RSES and the MASP should be based on a clearly articulated and robust green infrastructure strategy. This approach should clearly establish the strategic natural assets that should be protected. Within SDCC, the following are considered to be of strategic regional importance and could be recognised in both documents:

- Liffey Valley;
- Dublin Mountains;
- Dodder Valley;
- Grand Canal;
- Glenasmole Valley.

vi. How do we address water and waste water capacity issues in our large urban centres?

The provision of water services within the Greater SPA is a significant challenge. There needs to be continued investment in the upgrading of existing infrastructure to reduce wastage of water and provision made for a sustainable long term water supply.

The RSES must ensure that future growth of settlements is linked to capacity in water and wastewater services. Moreover, the RSES prioritise a settlement hierarchy which ensures that capacity in water infrastructure is reserved for identified growth centres rather than catering for inappropriate levels of growth at lower tier settlements. The RSES must be linked to Irish Water's capital investment programme and support the development of regionally strategic projects led by the SEA process.

vii. How can we build a strong cultural identity and tourism brand for our region?

In Ireland, there are already strong affinities to geographical areas such as parishes, counties and provinces. The EMR boundary is has been established for the purposes of spatial and economic planning. Rather than focussing on a new brand for the EMR, the RSES should build upon and reinforce existing cultural and tourism brands.

The Issues Paper highlights that the EMR area transcends three (3) tourism regions. There needs to be a strong economic argument for the development of an additional tourism brand. In addition, there may be practical difficulties in trying to develop a cohesive tourism brand for such a diverse area as the EMR which could mitigate against the development of a cohesive brand and strong message. Further research in this area should be carried out to ascertain its viability. The Issues Paper refers to

targeting functional areas³ rather than solely administrative areas. This raises the issues of the value of developing a brand for the EMR simply on the basis of a boundary which has been established for the purposes of spatial and economic planning.

Notwithstanding this, support should be given to developing the tourism product across the region, in line with best practice and national strategy and in sustainably capitalising on the area's rich resources. SDCC has sought to do this in recent years through developing proposals to provide enhanced visitor facilities in the Dublin Mountains, the preparation of a feasibility study and related implementation plan for the development of a Liffey Blueway and investment in heritage attractions including the Round Tower at Clondalkin.

viii. What are the key infrastructure bottlenecks that 'unlock' the growth potential of key sites in our region?

The Issues Paper states that *"Whilst several factors contributed to the increasing expansion of the Dublin hinterland, the chronic undersupply of appropriate and affordable housing in Dublin linked to infrastructure deficiencies has emerged as a principal factor."* The RSES and the MASP must address, identify and provide a roadmap for the solution of these infrastructural bottlenecks at regional and local level. The RSES must provide a strong policy context for key infrastructural projects supported by the SEA process. The RSES needs to address water and wastewater capacity as outlined above. The RSES needs to support the measures and projects set out in the National Transport Authority's *"Transport Strategy for the Greater Dublin Area 2016-2035"*.

The RSES settlement hierarchy should indicate the location and requirement for infrastructure. The MASP can be used to identify specific growth areas. The RSES should be supported by measures such as LIHAF which will enable planning authorities to secure funding to release such lands

ix. How do we support national commitments and respond to climate change in our region?

The Issues Paper acknowledges that Ireland is unlikely to meet its 2020 climate change targets. This is a matter which requires national action. The RSES, the Dublin MASP and Dublin SPA will have a role to play in this regard. The RSES has to do more than simply encourage sustainable land use and management strategies. The RSES must set out a sustainable land use, economic and transport strategy which can be implemented at a local government level.

The RSES needs to be flexible and robust to meet the climate change challenge. The RSES can address climate change in the following ways;

- i) Managing flood risk;
- ii) Effective surface water management;
- iii) Minimising the need to travel;
- iv) Encouraging modal shift to sustainable transport measures; and
- v) Promotion of energy efficiency at all levels in the built environment.

SDCC measures in area of climate change mitigation such as the *"South Dublin Spatial Energy Demand Analysis"* (SDSEDA) provide a model which should be promoted and encouraged more extensively at local government level.

Energy efficiency and the role of renewable energy in meeting Ireland's energy needs is growing more urgent. The RSES needs to set a clear spatial direction to identify and maximise suitable locations for strategic renewal projects. The Development Plan has identified a range of renewable energy options

³ Key questions on page 32 of the issues paper which include "How can policy making in the RSES consider functional areas instead of administrative boundaries?"

and has worked to spatially align these through the county, for example identifying where solar energy, wind energy and small scale hydro-electricity projects may be suitable.

x. How do we measure the success of the RSES?

The RSES success needs to contain metrics in order to measure its effectiveness. The following list of metrics are suggested:

- Quantum of housing units provided on brownfield lands and in the various settlements identified in the settlement hierarchy;
- Quantum of commercial development provided on brownfield lands and in the various settlements identified in the settlement hierarchy;
- Transport emissions;
- Changes in modal shift; and
- Journey times to work.

The RSES needs to incorporate monitoring and a defined review period to assess progress. The review can be used an opportunity to measure success of the achievement of policy/objectives. It can facilitate changes in policy/objectives where required and to strengthen policies/objectives which are not being achieved.

3. Conclusion

Dublin City is the only city of global scale in Ireland which competes internationally for inward investment. The RSES, Dublin MASP and Dublin SPA must support the continued development of Dublin city in a holistic and integrated manner to ensure the sustainable spatial and economic development of the EMR and the Country. SDCC has actively worked towards these objectives and looks forward to continuing to contribute to the development of Dublin City as part of the preparation and delivery of the RSES, Dublin MASP and Dublin SPA.

It is respectfully requested that the issues raised in this submission will be taken into account in preparing the RSES. 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