

Submission

On the

**Draft Regional Spatial and Economic Strategy for the
Eastern and Midlands Regional Assembly**

On behalf of

Ronan Group Real Estate and Colony Capital

To

*Eastern & Midland Regional Assembly
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1.0 INTRODUCTION

- 1.1 On behalf of our client, Ronan Group Real Estate and Colony Capital, Treasury Building, Grand Canal Street Lower, Dublin 2, we wish to make a submission on the Draft Regional, Spatial and Economic Strategy for the Eastern and Midlands Regional Authority as it relates to sustainable development within Dublin City and in particular the Dublin Docklands.
- 1.2 This submission is made in response to the draft strategy to further enhance the importance of increased building height, density and intensification within Dublin City and in particular the Docklands area.
- 1.3 It is submitted that a greater emphasis should be placed on the inclusion on policies as they relate to the National Planning Framework 2040, The Apartment Guidelines (2017), the National Transport Strategy for the Greater Dublin Region 2016-2035 and the Urban Development and Building Height Guidelines (2018) with regard to the promotion of urban consolidation, increased densities and increased building heights within the City on sites adjacent to public transport nodes.

2.0 GROUNDINGS OF SUBMISSIONS

- 2.1 It is acknowledged that a strong emphasis is placed on densification, consolidation and re-generation of key sites within Dublin City in association with public transport infrastructure throughout the Regional Spatial and Economic Strategy and in particular the Dublin Metropolitan Area Strategic Plan (MASP).
- 2.2 However, it is respectfully submitted that greater emphasis be placed on the policies and objectives as set out in the Urban Development and Building Height Guidelines 2018 with regard to implementing greater heights and densities within Dublin City Centre and the Docklands area to achieve a more sustainable and more compact urban form and reduce sprawl.
- 2.3 The Dublin Docklands development area has a critical role to play in delivering on this objective as it is the largest and most important development area in Dublin, located at the centre of the country's largest metropolitan area, exceptionally well served by high quality public transport provision.
- 2.4 While successful to date in terms of speed of delivery, it is widely recognised that the existing Planning Scheme is failing to deliver on the potential of this area, particularly in terms of the central issue of density and scale, due to the highly restrictive height limits placed on development in the North Lotts and Grand Canal Dock Planning Scheme 2014 for the SDZ area.
- 2.5 It is widely recognised that Dublin Docklands has been developed to date at too low a scale and density, particularly given the availability of large brownfield sites, largely unconstrained by existing development and its superb location directly on waterfront bodies of River Liffey and Grand Canal Dock. It is also exceptionally well served by high quality public transport, including Luas, Dart and proposed Dart Underground. Docklands is without question, the most important development area in the state and it is vital for current or future

generations, that it is development potential is properly realised. This is why it is designated as a Strategic Development Zone.

- 2.6 The current SDZ Planning Scheme unfortunately prevents this from happening. The window of opportunity for developing the remaining sites at more sustainable heights and densities in accordance with National Planning Framework and government policy, is extremely short, requiring immediate application of the relevant Development and Building Height Guidelines to the Docklands SDZ are
- 2.7 The MASP identifies the Docklands as a strategic residential and employment area along key public transport corridors that contains significant development opportunities. It should be noted that the majority of the sites in the Docklands are either built or under construction, therefore it important that the remaining sites be delivered in accordance with the policies and objectives of the NPF 2018 and the Urban Development and Building Height Guidelines 2018 to promote urban consolidation, increased heights and densities and that all national planning policies align to support this.
- 2.8 Ireland is in direct competition for foreign direct investment with all EU cities. The Docklands is a strategic area for attracting FDI to Dublin and Ireland. Therefore, it is critical that planning policy for the Docklands area enables this opportunity to be fully capitalised on and retain this international competitiveness. It is respectfully requested that the MASP and RSES provides for additional clarity on this and in particular recognises the need to develop the remaining heights in Docklands at a greater height and density to achieve these national and regional objectives.
- 2.9 Table 5.1 – Strategic Development Corridors, Capacity Infrastructure and Phasing sets out key objectives for the Docklands to further development people intensive high tech and service based business districts in the Docklands area and to build out further physical and social regeneration of the north east inner city. Extract from page 76, table 5.1 of the Draft Regional Spatial and Economic Strategy below:

| TABLE 5.1 Strategic Development corridors, Capacity Infrastructure and Phasing | | | |
|--------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| Corridor | Residential | Employment/ Mixed Use | Phasing Enabling Infrastructure |
| Docklands and City Centre (multi-modal within M50) | Docklands build out of North Lotts and Grand Canal Docks SDZ with further physical and social regeneration of Poolbeg and northeast inner-city lands | Further development of people intensive high tech and services-based business districts in Docklands and Poolbeg. | Short to Medium term LIHAF Dodder bridge, LUAS extension to Poolbeg, WW upgrade and district heating |

- 2.10 It is respectfully submitted that this table be revised on the basis of the policies and objectives of the Urban Development and Building Height Guidelines (2018) and the National Planning Framework 2040. The proposed revisions are set out in red below:

| TABLE 5.1 Strategic Development corridors, Capacity Infrastructure and Phasing | | | |
|--------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------|
| Corridor | Residential | Employment/ Mixed Use | Phasing Enabling Infrastructure |
| Docklands and City Centre (multi-modal within M50) | Docklands build out of North Lotts and Grand Canal Docks SDZ in accordance with the Urban Development and Building Height Guidelines and NPF to promotes increased heights and densities with further physical and social regeneration of Poolbeg and northeast inner-city lands | Further development of people intensive high tech and services-based business districts in Docklands and Poolbeg providing for increased heights, densities to achieve urban consolidation in key city centre areas and locations well served by high quality urban transport infrastructure. | Short to Medium term LIHAF Dodder bridge, LUAS extension to Poolbeg, WW upgrade and district heating |

- 2.11 The policies and objectives of the National Planning Framework, Regional Planning Guidelines for the Greater Dublin Area and Urban Development and Building Height Guidelines 2018 all significantly promote the consolidation of existing urban area through increased heights and densities in located well served by quality public transport infrastructure.
- 2.12 The current restrictive nature of the SDZ Planning Scheme which currently allows for 6-8 no. storeys in general with some sites identified for 12 no. storeys is a direct contradiction to National Planning Policy guidance which seeks to promote development in key urban sites, adjacent to high quality public transport networks.
- 2.13 The guidelines for Urban Development and Building Height 2018 in effect put in place a presumption in favour of higher buildings at public transport nodes and in city centre locations. The guidelines state that it is Government policy to promote increased building height in locations with good public transport services especially in city centre locations.
- 2.14 Therefore, the opportunity to apply the national planning policies initiatives by promoting increasing heights and densities is essential to the overall sustainable

development of the Docklands area and Dublin City. As such it is critical that all planning policies align in order to implement this important objective of urban consolidation and increased heights and densities.

- 2.15 Therefore, the proposed amendments to the RSES, MASP will make this clear in respect of future Docklands development and we respectfully request that they be included in the final publication.

3.0 CONCLUSIONS

- 3.1 We would be grateful if this submission could be given careful consideration in the finalisation of the RSES for the Eastern and Midlands Regional Authority.

- 3.2 We look forward to a favourable response from the Authority in relation to the above and if you require any further information please do not hesitate to contact us.

Yours Sincerely,



John Spain Associates