



## 2. Issues for Consideration

SDCC draws particular attention to the following aspects of the draft Guidelines to be taken into consideration, all of which are expanded upon in greater detail in this submission;

- **Guidelines and supports** for Planning Authorities on the preparation of Housing Need Demand Assessments are required;
- The **draft MASP map** (Figure 5.2) should be updated to provide more clarity and accuracy relating to strategic development corridors and locations;
- The regeneration potential of older industrial estate **lands at Naas Road / Ballymount within the M50** (across both Dublin City and South Dublin County Council's administrative areas) for residential uses, as well as more intensive employment and mixed uses, does not appear to be reflected in the draft RSES Settlement Strategy / MASP;
- **Brownfield lands in Tallaght** to be recognised as a regionally strategic location for more intensive employment and mixed use development, as well as residential development, in accordance with guiding principles for strategic employment locations contained in the draft RSES;
- **Regional Landscape Character Assessments** and identification of **Strategic Energy Zones** should be prepared and incorporated into the RSES in consultation with local authorities;
- A **Green Infrastructure (GI) strategy** is required for the region and its preparation should be included as an RPO;
- Ensure consistency and clarity in **terminology** across the document.

### 2.1 Growth Strategy

The growth strategy for Dublin City to *"Support the future success of Dublin as Ireland's leading global city of scale by better managing strategic assets to increase opportunity and to sustain national economic growth"* is welcome. Dublin maintains a unique position as the engine of the national economy which competes on a global level for jobs and investments. Dublin is a driver of national and regional economic growth rather than a competitor with other regions and cities/towns. It is important that the planning system embraces Dublin's ability to continue to function as Ireland's global city of scale in terms of population and enterprise/employment growth and seeks to direct this in a planned and sustainable manner.

South Dublin's position within the Dublin Region is one of its core economic strengths. In May 2018, over 200 hectares of land was zoned for Enterprise and Employment in Grangecastle Business Park, maximising the value of existing and planned infrastructural investment within the area. Allied to this, the proposed Variation No. 3 of the South Dublin County Council Development Plan 2016-2022 will provide for approximately 180 hectares of additional lands inside the M50 to promote the regeneration of underutilised brownfield lands for a mixed use environment of residential and commercial at Naas Road/Ballymount. The establishment of these significant and appropriately zoned land banks demonstrates South Dublin's ability to significantly contribute to future of economic development in the County. Together with the development of Adamstown and Clonburris Strategic Development Zones (SDZ's) and Kilcarbery, all designated Major Urban Housing Development Sites (MUHDS) and recipients of over €28 million in Government funding under the Local Infrastructure Housing Activation Fund (LIHAF), South Dublin County Council is fully committed to achieving compact growth and consolidation in the County.

## 2.2 Settlement Strategy

The County level population projections for the region, as set out in Appendix B of the RSES, forecasts a population in South Dublin of 308,000 - 314,000 to 2026 and 320,500 – 329,000 persons to 2031 from 279,000 persons in 2016. This is largely consistent with SDCC's forecast as set out in the South Dublin County Council Development Plan 2016-2022 and represents an approximate 20% share of the forecasted population growth of the four Dublin local authorities in line with recent trends.

SDCC is well placed to facilitate this level of growth within existing zoned lands, including the strategic development locations of Adamstown SDZ, Clonburris SDZ, Kilcarbery and Fortunestown (Saggart/Citywest) as well as the regeneration of brownfield lands at Tallaght and Naas Road/Ballymount within the M50. Consistent with the guiding principle of the draft RSES for compact sustainable growth, all of these areas of significant development potential are located within, encompassed by or contiguous to, the existing built up area of Dublin City and Suburbs.

South Dublin County Council supports the principle of establishing a Regional Housing Needs Demand Assessment for the four Dublin Local Authorities. At a policy level, housing is an important regional consideration and a more strategic approach needs to be adopted. In advocating this approach, however, sufficient flexibility needs to be built into such a methodology to allow local authorities to meet and react to issues that are more localised in nature and reflect the varying socio-economic differences across the County. In that regard, clarity of approach and application are integral to the achievement of a singular framework, with a necessity to ensure that each local authority interpret and apply the methodology's requirements in a consistent manner. While it is noted that the RSES supports National Policy Objective 37 of the NPF, it is recommended that a more robust and detailed policy approach is required at a Regional Level to support and guide the development and implementation of a Regional Housing Needs Demand Assessment that will provide a framework for housing strategies at a local level.

## 2.3 Metropolitan Area Strategic Plan (MASP)

The draft Dublin MASP identifies five strategic residential and employment development corridors on existing and planned high quality public transport routes *"to create sustainable compact communities with improved housing choice, access to social and economic opportunities, enhance services and amenities for a residential population of some 1.65m people in the metropolitan area by 2031"*. Of most relevance to South Dublin County Council is the *'South-West Corridor (Kildare line and DART expansion programmer, N81 and Luas redline)'*. SDCC supports the specific identification of strategic locations with high development capacity, including Clonburris SDZ, Adamstown SDZ, Kilcarbery, Grangecastle Business Park, Naas Road/Ballymount within the M50, Tallaght and Fortunestown (Saggart/Citywest).

It is considered that more clarity and accuracy should be provided to the map of the Dublin MASP (Figure 5.2). If the intention of Figure 5.2 is to provide a detailed Core Strategy Map for the Metropolitan area which will inform Core Strategy's at County Development Plan level, it is recommended that indicative outlines of these areas should be provided. At a minimum, it is recommended that a legend is provided with the map to accurately reflect the corresponding colour/line with the associated development corridor.

The following statement is welcomed by South Dublin County Council; *"The Naas Road lands are a significant landbank of over 700 hectares straddling the Dublin City Council and South Dublin County Council boundary, with long-term potential to become a major district centre but which require significant investment and site assembly efforts to enable their activation"* (Section 4.4). It is considered however that this statement is not accurately reflected within Table 5.1 'Strategic Development Corridors, Capacity Infrastructure and Phasing'. The Naas Road/Ballymount lands located within South

Dublin County have significant capacity for residential development in the context of brownfield regeneration.

The 'Docklands and City Centre' corridor identifies a significant landbank at the Naas Road "adjoining South Dublin". The location of these lands is not clear and would appear to be referring only to lands within the Dublin City Council administrative area. The 'South Western Corridor' identifies the lands at Naas Road/Ballymount for employment/mixed use purposes.

Proposed Variation No. 3 of the South Dublin County Council Development Plan 2016-2022 is currently underway and subject to approval by the Elected Members, will be made by the end of February 2019. The Proposed Variation allows for future residential development within the Naas Road/Ballymount lands in the context of brownfield regeneration in accordance with national and regional policy for sustainable compact growth and regeneration. It is therefore requested that Table 5.1 be amended to clarify that the brownfield lands around Naas Road/Ballymount within the M50 suitable for residential development, as well as more intensive employment and mixed uses, includes the said lands within South Dublin.

Furthermore, the following is noted in Section 5.8- "*Outside the M50 ring there is potential to reintensify older industrial estates such as Naas Road/Ballymount*". SDCC would like to clarify that these lands lie predominately within the M50. As noted previously and further within this submission, it is considered that clarity and consistency in terminology in the context of the Naas Road/Ballymount lands is essential to avoid confusion around its location. For the avoidance of doubt, the area identified for intensification and brownfield regeneration lies within the M50.

The identification of enabling infrastructure required to secure the development potential of strategic development locations is welcome. Some of these areas have been identified for longer term development dependent on phasing / infrastructural requirements. SDCC has furthermore identified the need for an additional Luas stop along the Red line at this location between Kylemore and Red Cow in order to realise the full regeneration potential of the lands at Naas Road/Ballymount within the M50. It is therefore recommended that the need for a new Luas stop to be provided at this location be recognised in Table 5.1, as a key medium term Phasing/Enabling Infrastructure requirement.

#### **2.4 Economic Strategy**

SDCC supports the recognition of the Naas Road/Ballymount lands and Grange Castle Business Park as strategic employment locations, as per Table 5.1 and 5.2 of the draft RSES/MASP.

There is a significant area of land adjoining Tallaght Town Centre, which has been recognised in the RSES/MASP as having potential for regeneration of brownfield lands for residential development. It is considered that this area also represents a strategic location for employment/mixed use development, in accordance with the guiding principles set out on Page 91 of the draft RSES, including proximity to Technological University Dublin – Tallaght Campus (formerly IT Tallaght), as well as existing business parks/industrial estates, existing cluster of employment, availability of regeneration land for more intensive uses, proximity to public transport, proximity to existing residential areas and future population growth centres.

SDCC considers this area to function as a regionally important strategic employment/mixed use location, with significant scope for more intensive employment/mixed uses, as well as residential, and recommends that this be reflected in the RSES/MASP (Tables 5.1 and 5.2). In November 2018, the strategic importance of these areas was recognised at Government level with an allocation of funding under the Urban Regeneration Development Fund (URDF), which aims to support more compact and sustainable development through regeneration.

## **2.5 Environment**

SDCC supports policies which seek to protect and enhance biodiversity of protected habitats and species and the overall range of ecosystems which they support.

SDCC supports the inclusion of greenways at and including access to the Liffey Valley, Dublin Mountains, Dodder Valley and Grand Canal within the Metropolitan Greenway Network. It is suggested that the metropolitan greenway network is represented on a separate map to Figure 5.3 in order to clearly distinguish this network as separate, yet complimentary, to the Metropolitan Area Cycle Network. Furthermore, the absence of a legend makes it difficult to comprehend Figure 5.3.

SDCC welcomes the policy support to developing the tourism product across the region, including policy objectives which seek to maintain and enhance access to strategic natural and cultural assets in the region for recreation and tourism purposes such as RPO's 6.15 and 6.16.

It is noted that RPO 7.25 states that a Regional landscape character assessment will be prepared upon adoption of a National Landscape Character Assessment. This will guide a consistent approach across local authorities and should be prepared and included within the RSES. South Dublin County Council's welcomes this policy objective.

## **2.6 Green Infrastructure (GI)**

It is recommended that the concept of GI should be reflected throughout the RSES where relevant and also should be clearly defined in line with EU<sup>1</sup> definition below, e.g. at the introduction to Section 7.6. This ensures consistency in interpretation from a European level, to a Regional level and further on at a local level.

South Dublin County Council considers that the preparation of a Green Infrastructure strategy is required for the region. Its preparation should be included as an RPO to ensure the preparation of a strategically planned network of high quality natural and semi-natural areas with other environmental features throughout the region, designed and managed to deliver a wide range of ecosystem services and biodiversity in both rural and urban settings in collaboration with local authorities and other stakeholders. The identification, mapping and classification of regional GI should be used to protect and preserve, enhance and build ecological connections between fragmented GI segments.

It is considered that a review of Figures 5.5 and 7.3 is required. Referencing a land use zoning objective as Green Infrastructure is inaccurate and misleading and does not reflect the principles of Green Infrastructure. It is considered that a GI map and Table 7.1 should be based on a regional assessment of existing sites, ecological links, etc. and include proposals where habitats could be recreated or developed to enhance existing habitats and / or form new networks and connections. Figure 5.5 and 7.3 may function better as an indicative map with the details to be provided within a GI strategy which is supported by RPOs.

It should be clarified that the list in Table 7.1 is indicative only and not exhaustive; a more comprehensive list may be better placed within a GI strategy for the region. A classification system for

---

<sup>1</sup> "Green Infrastructure can be broadly defined as a strategically planned network of high quality natural and semi-natural areas with other environmental features, which is designed and managed to deliver a wide range of ecosystem services and protect biodiversity in both rural and urban settings. More specifically Green Infrastructure, being a spatial structure providing benefits from nature to people, aims to enhance nature's ability to deliver multiple valuable ecosystem goods and services, such as clean air or water". European Union (2013): Building a Green Infrastructure for Europe.

strategic natural, cultural and heritage, etc. assets may be more appropriate allowing these to be determined at County Development Plan level.

In Section 9.8 it is suggested that the guiding principles for recreation and open space include the following:

- *Open space should be planned for on a multi-functional basis incorporating ecosystem services, climate change adaptation and mitigation measures and ensuring that open space provides for the retention and protection of key landscape features.*

It is suggested that an additional RPO should be included requiring the preparation of open space and parks strategies for each local authority.

## **2.7 Strategic Infrastructure**

SDCC welcomes policy support for enhanced rail and light rail services throughout Dublin, particularly on the Kildare Line and LUAS network improvements to South Dublin County.

The inclusion of the appraisal, planning and design of expansions to the LUAS network within key transport infrastructure investments is welcome. It is considered that any feasibility studies and proposals for the expansion of the LUAS line to Lucan and other areas of South Dublin should be progressed as early as possible, as such public transport infrastructure is essential to alleviating congestion in the area and facilitating sustainable development of both regionally and nationally identified high capacity strategic development sites in South Dublin County, including Adamstown and Clonburris SDZ's. Significant bus interchanges have also been identified for Liffey Valley and Tallaght Town Centres as part of the Bus Connects Scheme, reinforcing the strategic importance of these locations within South Dublin County.

SDCC welcomes the inclusion of the Adamstown and Nangor Road Improvements in Table 8.4 of the draft RSES, which are important in facilitating development of Adamstown and Clonburris SDZ's. Adamstown and Clonburris are strategic growth nodes in the County, offering significant potential for housing and commercial activity as well as being priority development areas. The delivery of sufficient public transport and road capacity is vital to the future development of the SDZs so as to facilitate sustainable new development in these areas.

It is noted that the N81 Tallaght to Hollywood Scheme, including linkage roads from Baltinglass and Dunlavin to N9 from N81 is a road scheme of strategic importance for the region. Taking into consideration the national status of this route and having regard to its existing capacity constraints, it is considered that this project should be included in Table 8.4 of the draft RSES, as supported by RPO 8.8, a priority road project for the region. This would serve to facilitate expanded bus services as envisaged in the National Transport Authority *Transport Strategy for the Greater Dublin Area 2016-2035*.

The draft MASP notes ongoing water supply and wastewater treatment projects to deliver capacity at a large scale to the metropolitan in Section 5.5. Enhanced water supply and wastewater treatment capacity are essential to facilitating the delivery and optimum development capacity of strategic development locations identified in the draft MASP.

As identified within the draft RSES and MASP, South Dublin's strategic locations with high development capacity include Adamstown and Clonburris SDZ's, Kilcarbery, Grangeacastle Business Park, Naas Road/Ballymount, Tallaght and Fortunestown (Saggart/Citywest). These areas are characterised as being high demand areas for housing and employment in the Dublin Region and are strategically located

proximate to national transportation infrastructure. These areas all require investment in water/wastewater services infrastructure in order to ensure the timely delivery of sustainable development and South Dublin reiterates the importance of its provision.

## **2.8 Measuring the Success of the RSES**

In the pre-draft submission, SDCC highlighted that the RSES needs to contain metrics in order to measure its effectiveness. The following list of metrics are suggested again:

- 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 should incorporate monitoring and a defined review period to assess progress. The review can be used as 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.

## **2.9 Consistency in Terminology**

In the interests of clarity and to avoid any confusion around the lands in question, SDCC recommends that lands at the Naas Road/ Ballymount are referred to consistently as such. In the absence of mapping for the area, these strategic brownfield regeneration lands should be consistently referred to as the Naas Road/Ballymount lands across the document and recognised as being within both Dublin City Council (DCC) and SDCC administrative areas. As a suggestion, "Lands at Naas Road / Ballymount within the M50" may be applied.

As noted previously, utilising the European Union's definition of Green infrastructure (GI) would provide consistency in approach to Green Infrastructure in the policy document, which can be further implemented at local plan level.

Reference to Grange Castle Business Park within the document should be consistently referred to as such in the interests of clarity.

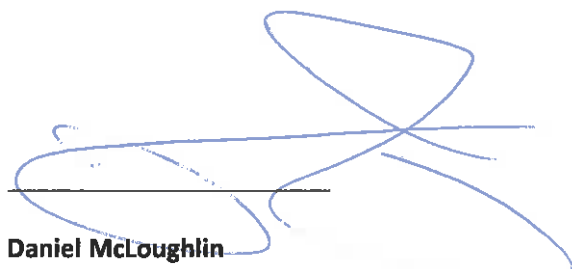
## **3. Conclusion**

Dublin City is the only city of global scale in Ireland, which competes internationally for inward investment. The RSES and Dublin MASP must support the continued development of Dublin City in a holistic and integrated manner to ensure the sustainable spatial and economic development of the Eastern and Midlands Region and the Country.

South Dublin County Council is committed to delivering a plan led approach for development of the Region, supporting and implementing national and regional objectives. SDCC continues to actively work towards realising this vision for the region through its enterprise and employment opportunities, its prioritisation of sustainable development in strategic growth nodes such as Adamstown, Clonburris and Kilcarbery and its overall commitment to facilitating the development potential of the region.

It is respectfully requested that the issues raised in this submission will be taken into account in finalising the '*Regional Spatial and Economic Strategy*'. Please do not hesitate to contact me if you require any clarification or further information in respect of the issues raised.

Yours sincerely,

A handwritten signature in blue ink, consisting of several overlapping loops and a horizontal line that extends to the left.

**Daniel McLoughlin**  
**Chief Executive**