

Heather Cooke

From: Stephen Purcell <stephen.purcell@futureanalytics.ie>
Sent: 23 January 2019 16:09
To: RSES
Subject: Finglas submission to EMRA Draft RSES
Attachments: 2-0709 RPT Finglas Submission to EMRA Draft RSES_v1.0.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Mr. Jim Conway
Director
Eastern & Midland Regional Assembly
3rd Floor North
Ballymun Civic Centre
Main Street
Ballymun
Dublin
D09 C8P5

Good afternoon Jim,

I trust you are keeping well.

On behalf of FINGLAS MCKEE PROPERTIES/SIGMA GROUP, DAVID HAYDE PARTNERSHIP AND KSG GROUP (c/o EMAOIFROB Ltd., Fourth Floor, Elgee Building, Dundalk, County Louth), Future Analytics Consulting (23 Fitzwilliam Square South, Dublin 2), Chartered Town Planning and Development Consultants, wish to submit the attached submission. The submission relates to the public consultation of the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region published by the Eastern and Midland Regional Assembly (EMRA).

The submission advocates for compact urban growth in the heart of Finglas settlement centre, through the recognition of a uniquely positioned land bank that was formerly in industrial use. Over many years, the efficient use of the lands have been compromised through a multitude of sectoral trends, to their current demise wherein the employment ratio/density on the lands is very poor. The central location of the lands mean they are ideally suited to accommodating a plan-led scheme with a mix of uses for residential, urban centre services and facilities, commercial, education and healthcare, etc. A high quality public realm with strong emphasis on permeability to connect with the existing settlement core would result in a quality urban environment from which the extensive established population in the community and zone of influence could benefit.

We look forward to an acknowledgement receipt relating to this submission.

Given the hugely important role that Finglas will play in the future of the Metropolitan Area, should EMRA find it beneficial to meet with the Project Group to discuss their ambitions for Finglas and how it can be delivered upon in a timely manner through a plan-led approach, please do not hesitate to make contact with me.

Many thanks in advance for your consideration of this submission.

Yours sincerely,

Stephen

Stephen M. Purcell

BSc. (Hons) MRUP PG DIP IS MIPi FCSI FRICS

Director



Future Analytics Consulting
Ltd.
23 Fitzwilliam Square (South)
Dublin 2, D02RV08
Ireland

T +353 (0) 1 639 4836
M +353 (0) 87 63 44 507
E stephen.purcell@futureanalytics.ie
S stephen.m.purcell



Disclaimer

Word of mouth referrals are appreciated. If you like what we have done for you and/or your business, please tell your contacts about us.

Keep up to date with
THE FAC BLOG



Submission to the Eastern and Midland Regional Assembly



On the **Draft Regional Spatial and Economic Strategy** for the Eastern and Midland Region

January 2019

BY


Future Analytics


**vanDijk
Architects**

ON BEHALF OF
FINGLAS MCKEE PROPERTIES/SIGMA GROUP,
DAVID HAYDE PARTNERSHIP AND
KSG GROUP

Submission to the Eastern and Midland Regional Assembly

On the Draft Regional Spatial and
Economic Strategy for the Eastern
and Midland Region

BY

Future Analytics



ON BEHALF OF
FINGLAS MCKEE PROPERTIES/SIGMA GROUP,
DAVID HAYDE PARTNERSHIP AND
KSG GROUP

Executive Summary	i
Section 01	
Introduction	1
Section 02	
Consolidation of Brownfield Lands	2
Section 03	
Sustainable Transport-led Regeneration	6
Section 04	
Employment Density and Regenerative Potential	9
Section 05	
Conclusion	14
Appendix	
Indicative Urban Massing	15

EXECUTIVE SUMMARY

The following are the key points of this submission on behalf of Finglas McKee Properties/SIGMA Group, David Hayde Partnership and KSG Group (“The Project Group”) to the Eastern and Midland Regional Assembly on the Draft Eastern and Midland Regional Spatial and Economic Strategy (EMRSES) as outlined in detail in the subsequent sections:

1 The Project Group welcomes the Draft EMRSES and is supportive broadly of its ambition of consolidate Dublin City and utilise brownfield land to enable growth in key areas of the city, particularly those with planned sustainable transport capabilities.

2 The Project Group has undertaken feasibility and preliminary development plans for lands at Finglas Industrial Park, approximately 250 north of Finglas Town Centre and is developing a vision for ‘Finglas Urban Quarter’ to consolidate Finglas Town Centre and meet ambitious targeted population uplifts noted in the EMRSES.

3 Given the significant urban sprawl that has occurred in the region’s recent history, the Project Group supports the EMRSES provisions that seek ‘compact urban development’; ‘the consolidation and re-intensification of infill/ brownfield sites’ in Dublin City and suburbs; ‘to refocus on the development of brownfield and infill lands’ and ‘to accelerate housing supply to achieve higher densities in the urban built-up areas’.

4 In particular, the Project Group supports EMRSES provisions that encourage reuse and re-purposing of brownfield lands as a preference over greenfield development. In this regard, the Project Group does not support the EMRSES Dublin MASP’s residential provisions, which conflict with the EMRSES and NPF objectives by seeking development of a ‘new district centre’ at Dunsink (Table 5.1, p. 76), ‘a major greenfield landbank’, in order to meet its targeted 60,000 person population increase, as opposed to presently under-utilised brownfield sites such as at Finglas Industrial Park.

5

The Project Group views the EMRSES Dublin MASP positively overall, however believes that the 'Housing and Regeneration' Regional Planning Objectives 5.4 and 5.5 fail to reflect the Guiding Principles of the MASP, which seek to re-focus on development of brownfield and infill lands'

6

The Project Group recognises the potential of the LUAS extension to Finglas that will further bolster Finglas' connectivity including the Bus Connects scheme. The EMRSES supports provisions within the EMRSES that seek to deliver the LUAS extension to Finglas; and

7

The Project Group supports EMRSES policies that seek to intensify employment uses in the city centre, and critically re-examine the location of employment uses. In this regard, the Project Group believes that the EMRSES fails to acknowledge the NPF 'growth enabler' for Dublin of 'relocating less-intensive uses outside the M50 ring'. Including this growth enabler in the EMRSES would not only respect the planning policy hierarchy but support the EMRSES Dublin MASP's 'Guiding Principles' to 're-intensify employment in the city centre'

The following submission makes recommendations of amendments to the EMRSES that the Project Group believes will make the strategy more appropriate for the future development of Dublin City and the EMRA.

It should be noted that a comprehensive submission relating to the subject lands was made to the Dublin City Development Plan 2016-2022 review (submission prepared by Tom Philips and Associates, TPA), where a compelling case for the lands to be the subject of a Strategic Development and Regeneration Area (SDRA) designation and more suitable zoning was set out. In the intervening period, it is understood that Dublin City Council is reviewing the suitability of underutilised land banks - traditionally former/underperforming industrial lands - to be rezoned to accommodate housing and mixed use development in a plan-led and sustainable manner. The submission herein aligns with this ambition and demonstrates the strategic importance of the subject lands for the future of the urban core of Finglas.

Section 01

INTRODUCTION

Future Analytics Consulting Ltd. (FAC) has prepared this submission to the Eastern and Midland Regional Assembly Draft Regional Spatial and Economic Strategy (EMRSES) on behalf of the Project Group. Please note, a previous comprehensive planning submission was submitted on behalf of the Project Group on the Dublin City Development Plan 2016-2022. The Project Group commends the Eastern and Midland Regional Assembly (the Assembly) on the publication of the document which is directly informed by Project Ireland 2040 - The National Planning Framework (NPF) and National Development Plan (NDP). The Project Group strongly supports the combination of spatial and economic planning to provide one document which supports the future growth of the Eastern and Midland Regional Assembly (EMRA) region. This overarching approach provides a high level, consistent approach to planning of the economic core of the country and is supported by the Project Group.

Given the important economic role the Dublin Metropolitan Area plays in Ireland, and its influence on the Eastern and Midland Region, following the publication of the NPF, the Project Group recognises the need for a high-level strategic document to guide and coordinate the sustainable development of in the region, and we commend the Eastern and Midland Regional Assembly for drafting the Eastern and Midland Regional Spatial and Economic Strategy (EMRSES). With the continued high levels of population growth within the Eastern and Midland Region, outstripping that of the other regions, it is imperative that future urban development occurs in a sustainable manner, which makes most efficient use of the limited land available. A strong feature of the draft RSES is that residential development should be directed to existing built up areas. This will ensure that future communities are connected and integrated within Dublin's urban form and are well placed to avail of current and proposed services and infrastructure. Further, such an approach safeguards the region's productive agricultural land and recognised natural assets, important resources in their own right.

It is with this strategic approach in mind that the Project Group has considered how the Draft EMRSES relates to Finglas and influences its development as a 'Key District Centre' in the *Dublin City Development Plan 2016-2022*. Finglas lies approximately 5.3 km from Dublin's city centre, and in Census 2016 it had a population of over 23,000, incorporating seven Electoral Districts, in one of the fastest growing urban districts in Ireland. It's designation by Dublin City Council as a Key District Centre under the *Dublin City Development Plan 2016-2022* acknowledges Finglas' importance to Dublin City. Further underlining the potential of Finglas as a settlement of scale, the LUAS extension to Finglas, planned in the *National Transport Authority's Transport Strategy for the Greater Dublin Area 2016-2035*, is included in the *National Development Plan 2018-2027* alongside the *National Planning Framework (Project Ireland 2040)*. Feasibility studies and indicative development plans for the 23 hectare 'Fingal Urban Quarter' brownfield regeneration site have been undertaken by the Project Group and are included in this submission for information purposes.

Section 11

Finglas is therefore recognised as an urban centre of scale and one with significant growth potential. It is clear that the Draft EMRSES is to play a significant and welcome role in the future development of Finglas. As such, the Project Group wishes to make a submission to the Draft EMRSES for the following reasons:

The Project Group supports the EMRSES provisions that seek 'compact urban development'; 'the consolidation and re-intensification of infill/ brownfield sites' in Dublin City and suburbs; 'to refocus on the development of brownfield and infill lands' and 'to accelerate housing supply to achieve higher densities in the urban built-up areas'. The EMRSES supports this through 'Guiding Principles' for the growth of the Dublin Metropolitan Area (DMA), the Settlement Strategy and Regional Policy Objectives 4.3 and 9.9, which set out a target of 50% of new homes to be situated within or contiguous to the built-up areas of Dublin City and its suburbs.

The Project Group does not support the EMRSES Dublin MASP's residential provisions, which conflict with the EMRSES and NPF objectives by seeking development of a 'new district centre' at Dunsink (Table 5.1, p. 76), 'a major greenfield landbank' in order to meet its targeted 60,000-person population increase, as opposed to presently under-utilised brownfield sites such as at Finglas Urban Quarter.

The Project Group supports the Dublin Metropolitan Area Strategic Plan MASP's approach of defining Strategic Corridors including the Inner M50 Ring, however it is submitted that the MASP takes a transport-centric view and is weak on housing delivery. In particular 'Housing and Regeneration' Regional Planning Objectives 5.4 and 5.5 fail to reflect the Guiding Principles of the DMA, which seek to re-focus on development of brownfield and infill lands'.

The Project Group supports the EMRSES Guiding Principles for the MASP, in particular the principle to 'support the steady supply of sites to accelerate housing supply', and targeting growth along high quality public transport corridors including the LUAS extension Programmes (to Finglas), the delivery of which is included as Regional Policy Objective 5.2;

The Project Group does not support the 'Growth Enablers' as drafted for the Dublin Metropolitan Area as they fail to incorporate the NPF 'Growth Enablers' for Dublin as outlined in the NPF. Among the growth enablers that the Project Group believes that the EMRSES fails to acknowledge the NPF 'growth enabler' for Dublin of 'relocating less-intensive uses outside the M50 ring'. Including this growth enabler in the EMRSES would not only respect the planning policy hierarchy, but support the EMRSES Dublin MASP's 'Guiding Principles' to 're-intensify employment in the city centre'

The following sections set out in detail the Project Group's submission to the Draft EMRSES expanding on points 1 to 5 above.



Section 02

CONSOLIDATION OF BROWNFIELD LANDS

Expanding on points 1 to 3 above, it is noted by the Project Group that Ireland has a long history of development focussed on greenfield sites, which has led to a steady expansion and sprawl of built up areas, particularly in the Dublin Metropolitan Region. The NPF recognises the inherent dangers in continuing to push development outside pre-existing settlements to greenfield locations, acknowledging that “meeting Ireland’s development needs in housing, employment, services and amenities on mainly greenfield locations will cost at least twice that of a compact growth-based approach” (NPF, p. 28). The NPF strongly encourages brownfield development as a sustainable alternative to greenfield development and determines that the ‘extent to which we prioritise brownfield over greenfield use, encourage the use and reuse of buildings in urban and rural areas, and reduce sprawl, will all help to increase the efficiency of land use’... (NPF, p.118). The Project Group commends the NPF in the regard and believes that the efficient utilisation of available brownfield resources is vital to achieve the sustainable development of the Dublin Metropolitan Area (DMA). The EMRSES Dublin MASP includes “guiding principles”, which seek to “re-focus on development of brownfield and infill lands”. In addition, a Regional Planning Objective (RPO4.3) is included in the EMRSES, however these provisions are not brought forward to feature in Regional Planning Objectives for the MASP. It is therefore argued that the NPF’s approach to greenfield and brownfield residential development is not adequately reflected in the draft EMRSES.

It is striking that the ‘Housing Delivery’ section of the Dublin MASP includes Regional Planning Objectives 5.4 and 5.5 which fail to reflect the Guiding Principles of the DMA, in terms of brownfield redevelopment (EMRSES, p.79). While the draft EMRSES explicitly seeks ‘the consolidation and re-intensification of infill/brownfield sites’ in RPO 4.3, it conflicts with this objective in the Dublin MASP, which seeks to meet its targeted 60,000 population increase in part by residential development of Dunsink – ‘major greenfield landbank’. The Guiding Principles for the sustainable development of the Dublin Metropolitan Area reiterate the principle to ‘refocus on the development of brownfield and infill lands to achieve a target of at least 50% of all new homes within or contiguous to the existing built up area in Dublin and at least 30% in other settlements’.

The ambition of the Dublin MASP to develop the greenfield site at Dunsink represents a serious inconsistency in messaging in the EMRSES, and one which sets a precedent for planning authorities and developers to pursue greenfield development not only in Dublin but across the region. Dunsink is not only a greenfield site but is predominantly zoned ‘HA High Amenity’ in the Fingal Development Plan 2017-2023 with the zoning objective to ‘Protect and enhance High Amenity Areas’. The remaining northwest portion of Dunsink is zoned ‘GB Green Belt’ with the zoning objective to ‘Protect and Provide for a Greenbelt’. Dunsink is also home to Dunsink Observatory and Teagasc Research facilities. The development of Dunsink is therefore not only conflicting with the objectives to consolidate and re-intensify Dublin City and suburbs, but objectives to support recreation and open space provision (RPO 9.19 and RPO 9.20). To develop this important amenity space for Dublin City would not represent sustainable planning and put at risk the overall quality of life of the city.

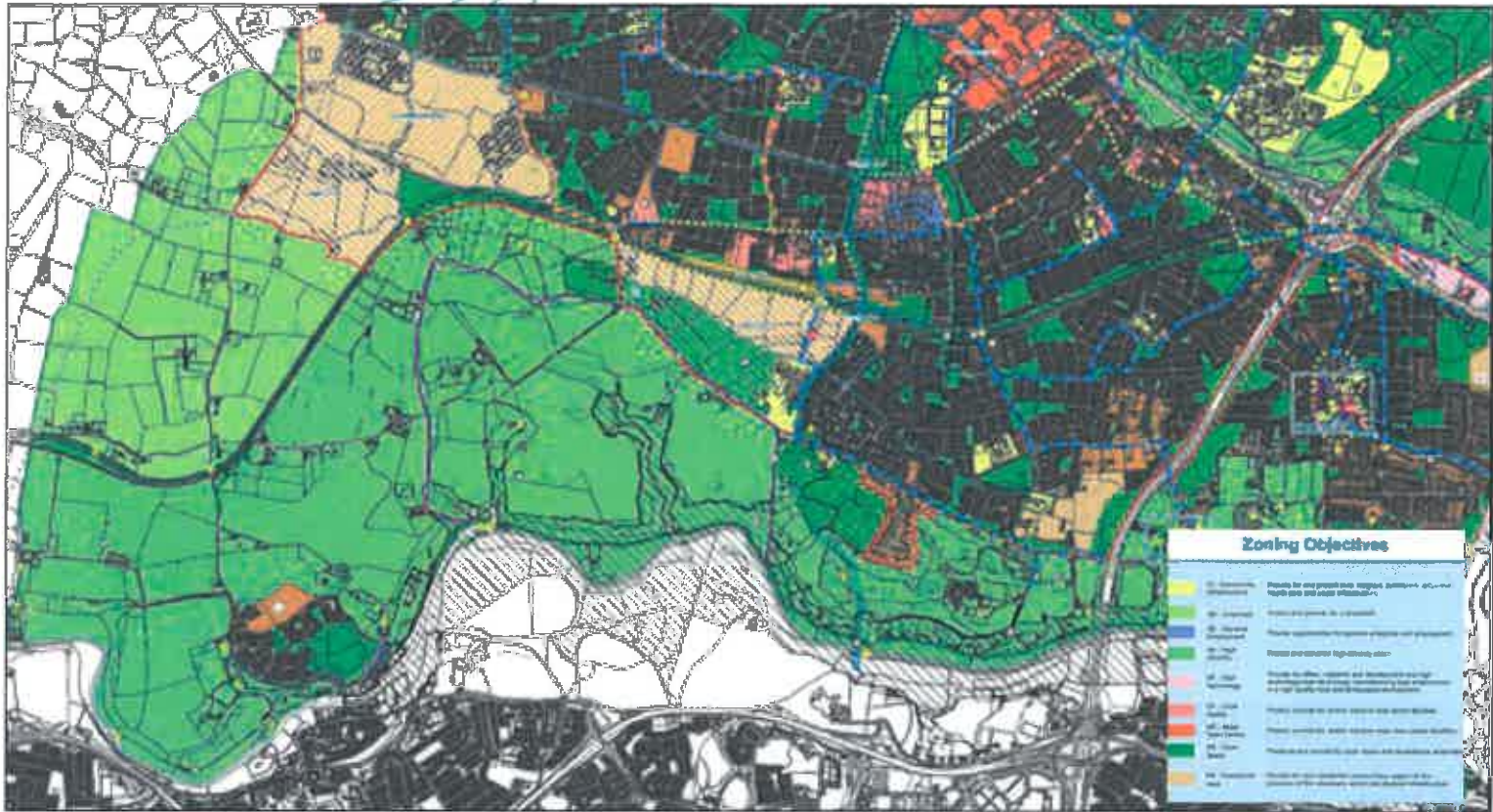


Figure 1: Fingal Development Plan 2017-2023 Zoning Map showing High Amenity and Greenbelt zoning at Dunsink

The ambition of the Dublin MASP to develop the greenfield site at Dunsink represents a serious inconsistency in messaging in the EMRSES, and one which sets a precedent for planning authorities and developers to pursue greenfield development not only in Dublin but across the region. Dunsink is not only a greenfield site but is predominantly zoned 'HA High Amenity' in the *Fingal Development Plan 2017-2023* with the zoning objective to 'Protect and enhance High Amenity Areas'. The remaining northwest portion of Dunsink is zoned 'GB Green Belt' with the zoning objective to 'Protect and Provide for a Greenbelt'. Dunsink is also home to Dunsink Observatory and Teagasc Research facilities. The development of Dunsink is therefore not only conflicting with the objectives to consolidate and re-intensify Dublin City and suburbs, but objectives to support recreation and open space provision (RPO 9.19 and RPO 9.20). To develop this important amenity space for Dublin City would not represent sustainable planning and put at risk the overall quality of life of the city.

The Dublin MASP as it is presently drafted is therefore not only in direct conflict with RPO 4.3, 9.19 and 9.20 (as outlined above) but fails to recognise the development potential of nearby brownfield sites close to existing urban centres, such as at Finglas Industrial Park. It is argued that Finglas exhibits greater development potential than Dunsink and is in line with the objectives set out in both the NPF and RSES, and that this should be recognised as such. Finglas is situated only approximately 2.5km to the east of Dunsink and is well serviced by current public transport services. Further, the commitment to deliver the extension of the LUAS Greenline (this is examined in greater detail below) bolsters Finglas' position as a sustainable urban centre. As such, it is well suited for densification by way of brownfield development.

Section 02

The need for re-using and adapting industrial land for residential supply has been expressed by Dublin City Council's Head of Housing and Community in August 2018, when he suggested that the city would run out of residentially zoned land within four years¹. The site in question alone represents a brownfield site of 23 hectares of present under-utilised industrial lands (this is examined in greater detail below), and the unlocking of this site for residential development would be a significant step towards achieving the ambitious target of siting 50% of all new homes within or contiguous to the existing built up area in Dublin, as well as meeting the 60,000 population increase within the M50 ring (see **Figure 1** below for an indicative design). The neighbouring landowners are fully informed of this ongoing process, and the owners of the Haribo site have indicated that this site will be made available to form art of the overall Masterplan Vision for this area.

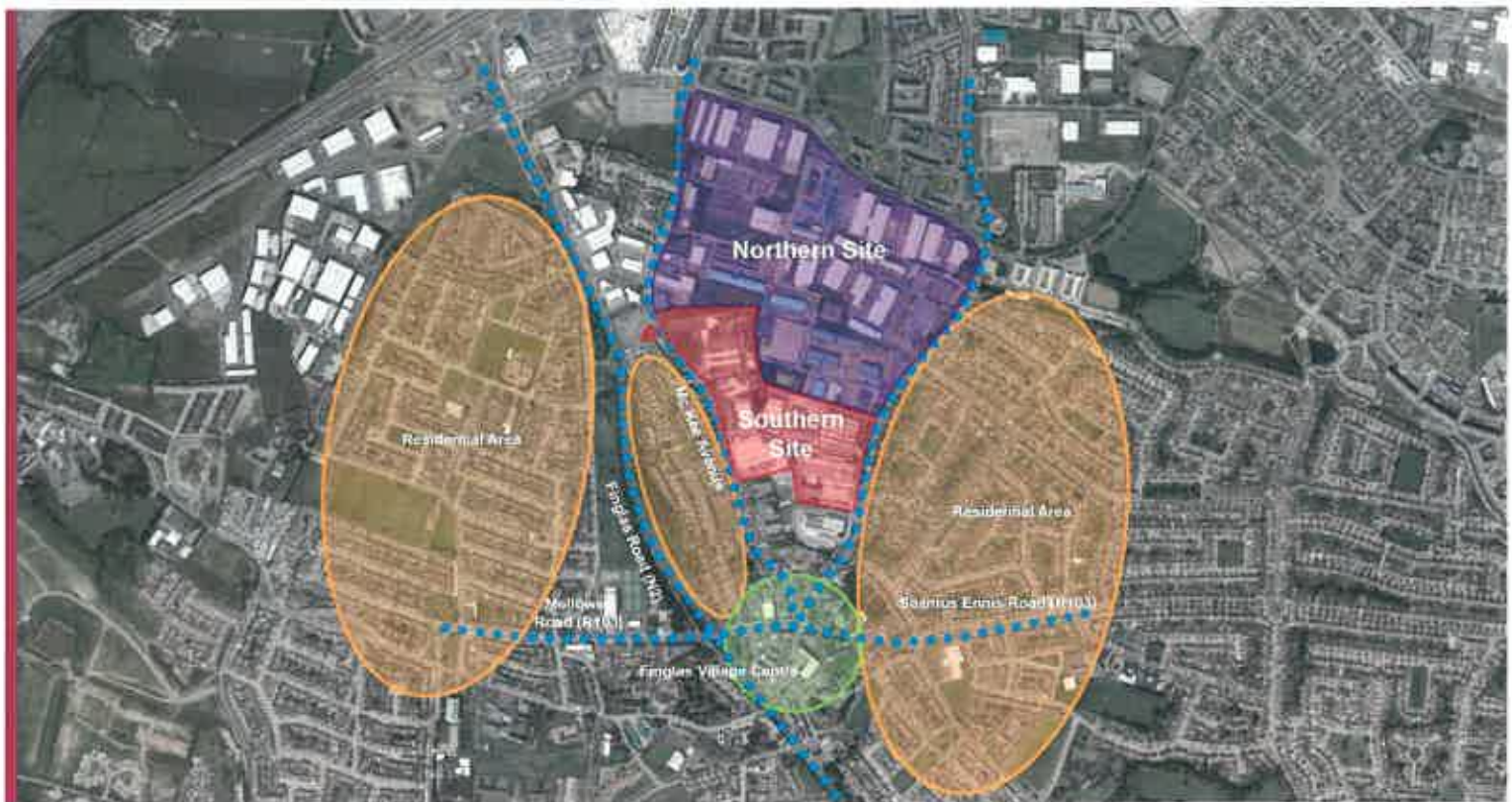


Figure 2: Urban Evolution of Finglas Urban Quarter in 2018 and 2020. Terms Delivery and development lands with long-term potential by Van Dyk Architects

¹ <https://www.irishtimes.com/news/environment/dublin-industrial-estates-could-be-rezoned-for-homes-1.3594127>



Figure 3: Schematic preliminary design for Finglas Urban Quarter (Van Dyk Architects)

Section 112

As outlined by Dublin City Council's Head of Housing:

These industrial estates are ripe for development but are owned by many people. We would like to see landowners coming together with masterplans on how their sites might be redeveloped.

The Project Group agrees that Industrial lands are ideally placed to be re-purposed to meet the needs of a growing city, and pursuant to this a process of site acquisition has led the Project Group to a position of feasibility in re-developing Finglas Industrial Park (lands shown above in red) in a project preliminarily named 'Finglas Urban Quarter'. Having undertaken an evaluation on the lands shown, the ultimate aim of the Project Group is to re-purpose the lands to allow for continued employment generating uses while accommodating regenerative uses such as residential and office development.

This is proposed to take the form of a change in zoning from Z6 to Z14. This change will continue to allow for industrial use types as presently exists, but also other regenerative uses such as residential and office development, meeting present day demands. This zoning change would not only reflect the demand for housing, but also the changed economic profile of Ireland, which has moved from a manufacturing-based economy, to an international service hub. This envisaged change is reflected upon in more detail in section 4 below.



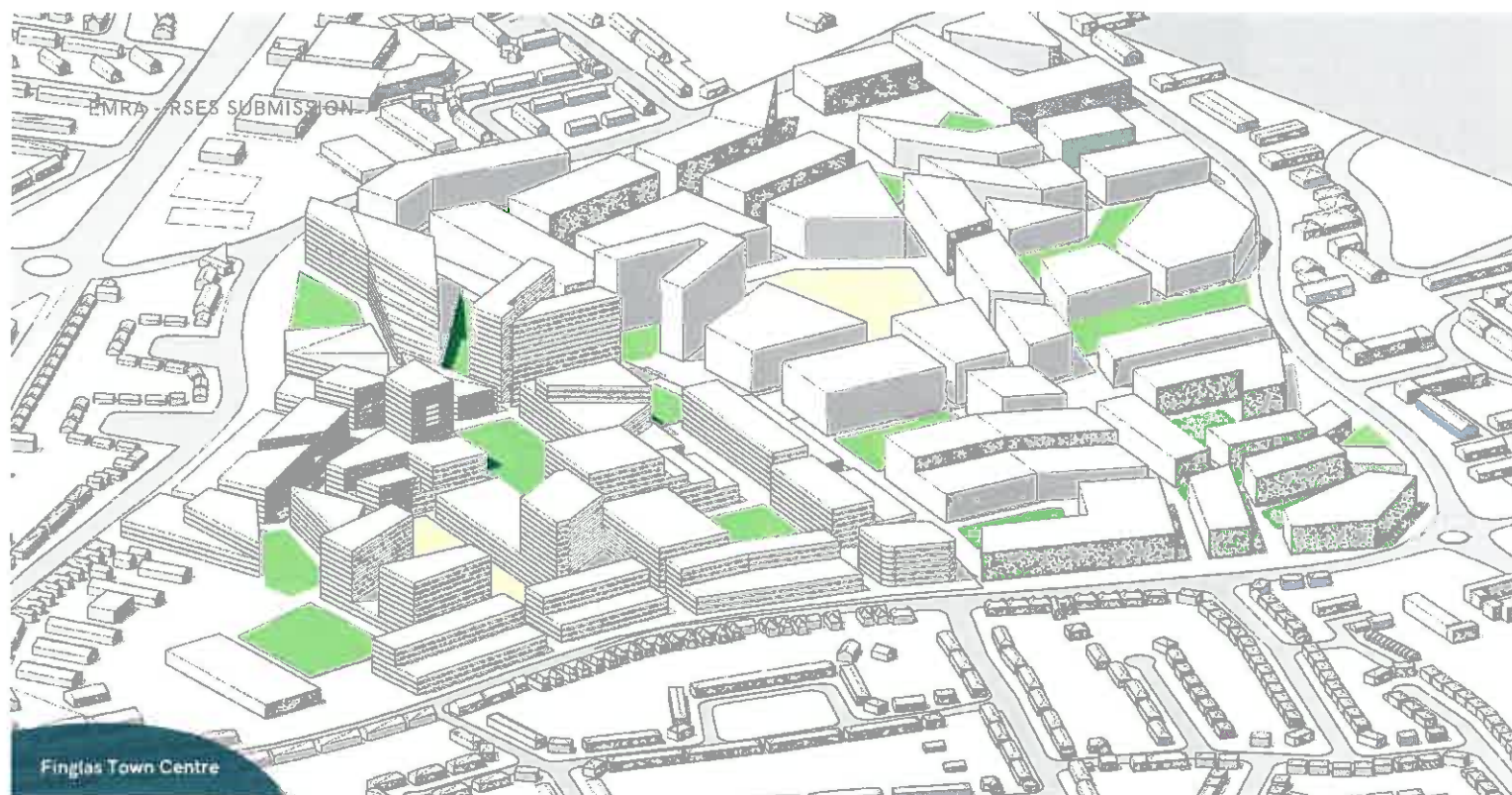


Figure 4: Indicative development potential of future Z14 lands at Finglas Urban Quarter (Van Dyk Architects)

For reference the following Regional Planning Policies are those which the development of Dunsink greenfield lands would be in direct conflict with:

RPO
4.3

RPO 4.3 Support the consolidation and reintensification of infill/brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin city and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.

RPO
9.19

RPO 9.19: Local authorities shall seek to support the planned provision of easily accessible social, community, cultural and recreational facilities and ensure that all communities have access to a range of facilities that meet the needs of the communities they serve.

RPO
9.20

Table 9.20: Local Authorities shall support the vision and objectives of the National Sports Policy, including working with local sports partnerships, clubs, communities and partnerships within and beyond sport, to increase sport and physical activity participation levels locally.

Recommendations: Add a Regional Planning Objective to the Dublin MASP that reflects the guiding principles (and RPO 4.3) to which seek as a preference to 're-focus on development of brownfield and infill lands'. Failure to reflect this in the Housing Delivery objectives of the Dublin MASP is a major oversight and calls into question the integrity of the stated principle.

Remove the reference in the Dublin MASP in the EMRS to develop the major greenfield landbank at Dunsink as it conflicts with the NPF and sets a precedent that devalues RPO 4.3; 9.19; and 9.20. Include in the Dublin MASP a provision to prioritise compact growth at suitable under-utilised brownfield industrial lands ahead of undeveloped greenfield sites, to meet ambitions towards additional population as required within the M50 ring.

Section 1.12

SUSTAINABLE TRANSPORT-LED REGENERATION

Expanding on submission point 4 above, the Project Group commends the EMRA for the approach of the EMRSES's to co-ordinate development with the provision of public transport, and the delivery of proposed transport infrastructure projects such as the LUAS extension to Finglas as underlined by the EMRSES Guiding Principles for Integration of Land Use and Transport (EMRSES, p.67), the Dublin MASP (EMRSES, p.70) and RPO 8.6 (148). It is with this in mind that the Project Group believes that unlocking brownfield land at Finglas for residential development would be consistent with the integration of land use and transport. It is imperative for the sustainable growth of Dublin that new developments are suitably located and can provide connectivity and accessibility for residents and workers. Further, it is vital that location of development strategically anticipates future transport upgrades, to ensure that new developments are suitably located and integrated within the public transport system. Specifically, the following objective is supported and will ensure the future growth and sustainable development of Finglas:

RPO 5.2	RPO 5.2 Support(s) the delivery of key sustainable transport projects including Metrolink, DART and LUAS expansion programmes, Bus Connects and the Greater Dublin Metropolitan Cycle Network and ensure that future development maximises the efficiency and protects the strategic capacity of the metropolitan area transport network, existing and planned.
RPO 8.6	RPO 8.6: The RSES supports delivery of the rail projects set out in Table 8.2, subject to the outcome of appropriate environmental assessment and the planning process.
TABLE 8.2	Table 8.2: Rail Projects for the Region is "Undertake appraisal, planning and design of LUAS network expansion to Bray, Finglas, Lucan, Poolbeg".

Commitment to the planned LUAS extension comes from the National Development Plan, which notes it as a key investment as follows:

In line with the National Transport Authority's Transport Strategy for the Greater Dublin Area 2016-2035, undertake appraisal, planning and design of LUAS network expansion to Bray, Finglas, Lucan, Poolbeg and a light rail corridor for Cork in the later stages of the period of the Cork Transport Strategy which is being finalised. (p. 54).

Background

The planned LUAS extension will place Finglas in a similar position to that of Dublin Industrial Estate, which is served by Broombridge LUAS stop and for this reason the lands have been mentioned as a prime candidate for residential development potential by the DCC Head of Housing, Brendan Kenny. The concept of repurposing of industrial brownfield lands is expanded in more detail in Section 4 below.

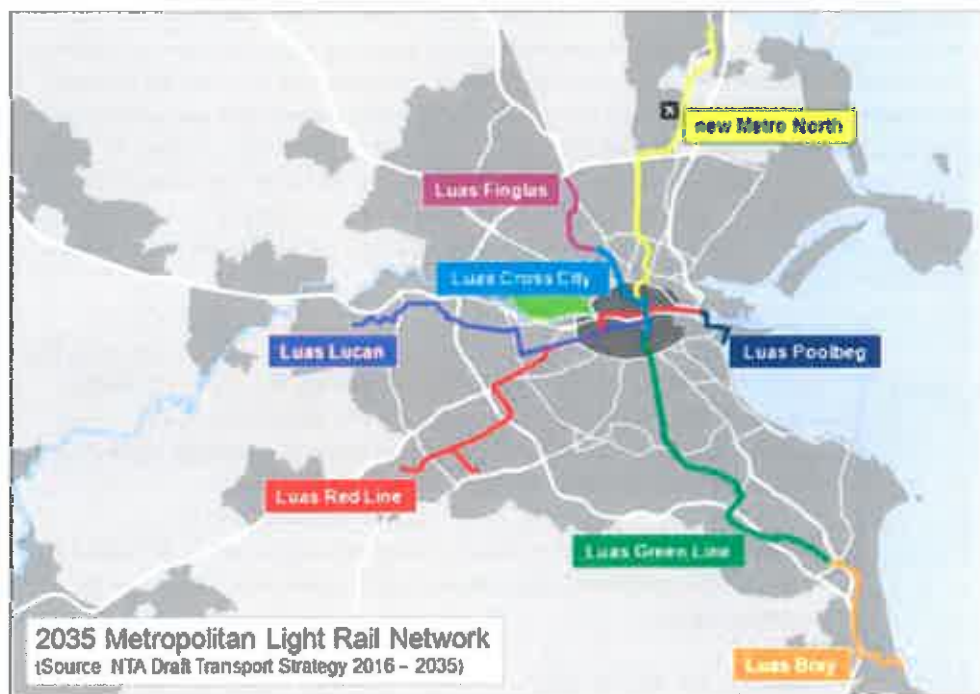


Figure 5: LUAS 2035 Strategy Map showing LUAS Finglas connection.

Finglas is already served well by public transport for its present capacity, and the LUAS will secure the long-term future of this Key District Centre. As a Key District Centre, Finglas presently has two Core bus corridors public transport provision within Finglas under the current bus network is strong. Finglas is connected to the city centre by way of the 40 and 40b bus route, as well as the 140. Based on the NTA's Dublin Area Bus Network Redesign Public Consultation Report these routes are high-mid frequency, with the 40 operating on a weekday midday frequency of 10-15 minutes and the 140 operating on a frequency of 20-25 minutes.

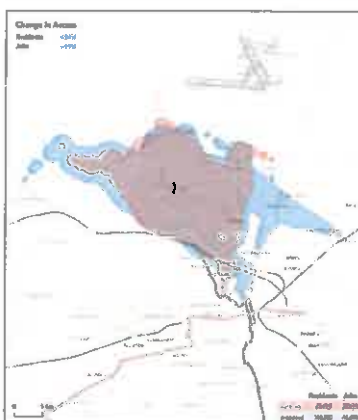
Section 03



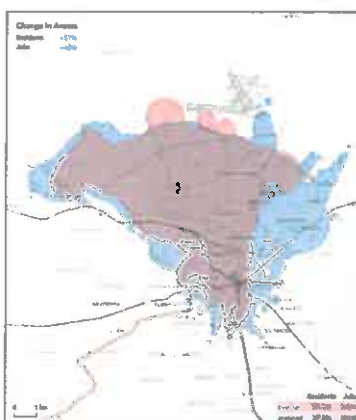
Figure 6: Existing Bus connections to Finglas Town Centre (Source: Spleodrach [CC BY SA 4.0 (<https://creativecommons.org/licenses/by-sa/4.0/>)] & Matty from Halifax, England [CC BY 2.0 (<https://creativecommons.org/licenses/by/2.0/>)]

Current bus routes also link Finglas to its surrounding environs; the 220 and 17a pass through Finglas from Blanchardstown to Ballymun and Donaghmede, while the 40d connects Tyrellstown and Parnell Street by way of Finglas as well. These routes are mostly mid-frequency, with the 17a operating every 20-25 minutes and the 40d operating every 30 minutes. The 40d and 220 represent Finglas's least frequent bus routes, with both operating less than hourly.

How far can I travel in 30 minutes from Finglas Village on weekdays at 12 pm?



How far can I travel in 45 minutes from Finglas Village on weekdays at 12 pm?



How far can I travel in 60 minutes from Finglas Village on weekdays at 12 pm?

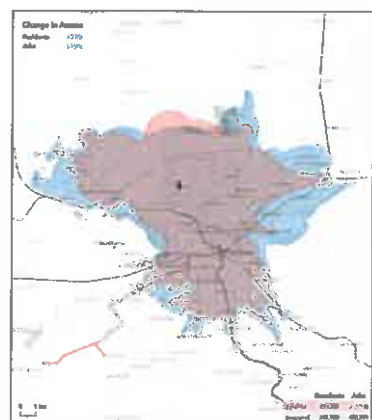


Figure 7: How Close to synchronous Shopping for Finglas

Summary

The redesign of Dublin's bus network, 'Bus Connects' due for delivery by 2027 under the National Development Plan, will see the consolidation of Finglas as a key public transport corridor within the Dublin region. Finglas will be connected to the city centre by way of the high frequency F route and 7 routes, with both operating every 10-15 minutes. The similarly high-frequency N4 radial route will connect Finglas to both Blanchardstown and the Docklands.

The isochrone maps in **figure 7** provided in Dublin Area Bus Network Redesign Public Consultation Report display the increased range of residents and jobs across the Dublin region that will be accessible from Finglas within 30 minutes, 45 minutes and 60 minutes of departure. Based on this analysis the redesigned bus network will provide access to 54%, 57% and 33% more residents and 99%, 40% and 15% more jobs respectively. In addition to Bus Connects, the NTA Core Orbital Bus Network (included in the NTA Transport Strategy for the GDA 2016-2035) will provide an orbital link from Dundrum in the south east of Dublin to Finglas in the north west, avoiding the city centre and increasing yet further the connectivity of Finglas.

Finglas is therefore due to become one a highly connected part of Dublin City in the coming decades with the implementation of the Bus Connects scheme along with the LUAS extension supplementing the existing bus services currently serving Finglas.

The EMRSES provides strong messages around the necessity for adequate transport to be a central consideration for development of lands. A Guiding Principle for Integration of Land Use and Transport is as follows;

For urban-generated development, the development of lands within or contiguous with existing urban areas should be prioritised over development in less accessible locations. Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised. (EMRSES, p.145)

This approach is strongly supported by the Project Group, and it noted that in the EMRSES Dublin MASP strongly integrates sustainable transport principles, for example is seeks targeting growth along high quality public transport corridors including the LUAS extension Programmes (to Finglas).

Recommendation: Strengthen ambitions to deliver the LUAS extension to Finglas to unlock the full potential of Finglas as a Key District Centre and one which can significantly address housing shortages in Dublin City.

Section 04

EMPLOYMENT DENSITY AND REGENERATIVE POTENTIAL

Expanding on point 5 above, the Project Group strongly agrees with the Dublin City Council Head of Housing that many industrial landbanks in the city provide great potential to significantly increase supply of housing. Having undertaken feasibility studies of the presently industrial lands shown in **Figure 2** above, it should be acknowledged that the nature of employment in the city has changed radically in the past two decades. Ireland's new economic model has reduced its reliance on manufacturing and is firmly positioned as a service-based economy (see **Figure 8** below). In this context many of the industrial estates that formerly played a central role in Ireland's economy now play less of a role in providing employment. In the context of the scarcity of available land in the city, the EMRSES is rightly recognising this and a focus on redevelopment of brownfield lands for residential use is a strong feature of the EMRSES (see section 3 above).

	2007, Q2 - 2012, Q2	2012, Q2 - 2015, Q2	2007, Q2 - 2015, Q2
Agriculture, forestry and fishing	-19.63	28.16	8.53
Industry	23.20	6.94	16.63
Construction	-43.62	16.41	-27.21
Wholesale and retail trade	-15.14	1.30	-13.84
Transportation and storage	-2.60	2.09	-0.51
Accommodation and food	-2.64	13.42	10.78
Information and communication	14.04	1.31	15.35
Financial and insurance activities	-3.28	3.42	0.14
Real estate	-7.49	13.67	6.18
Administrative activities	-20.48	1.32	-19.16
Public administration and defence	-1.05	0.89	-0.16
Education	-2.96	3.01	0.05
Health and social work	15.45	1.92	17.37
Arts and recreation	2.44	1.64	4.08
Unemployed	-11	-	-11
Total	-14.10	6.77	-7.33

Figure 8: Changes (%) in employment by sector 2007-2015

The wider picture in the Dublin MASP area shows that concerns expressed by Dublin's Head of Housing about supply of land are well-founded. Specifically, the concerns are outlined as follows:

The council's head of housing, deputy chief executive Brendan Kenny, said the city would "run out" of residentially zoned development land in four years and must turn its attention to industrial estates as a source of new housing land.

Figure 9 below shows the extent of the industrial landbanks (in blue), visualising the potential of re-purposing these for residential housing supply. The unbuilt, zoned residential lands are shown in orange and represent a much smaller quantum of hectares.

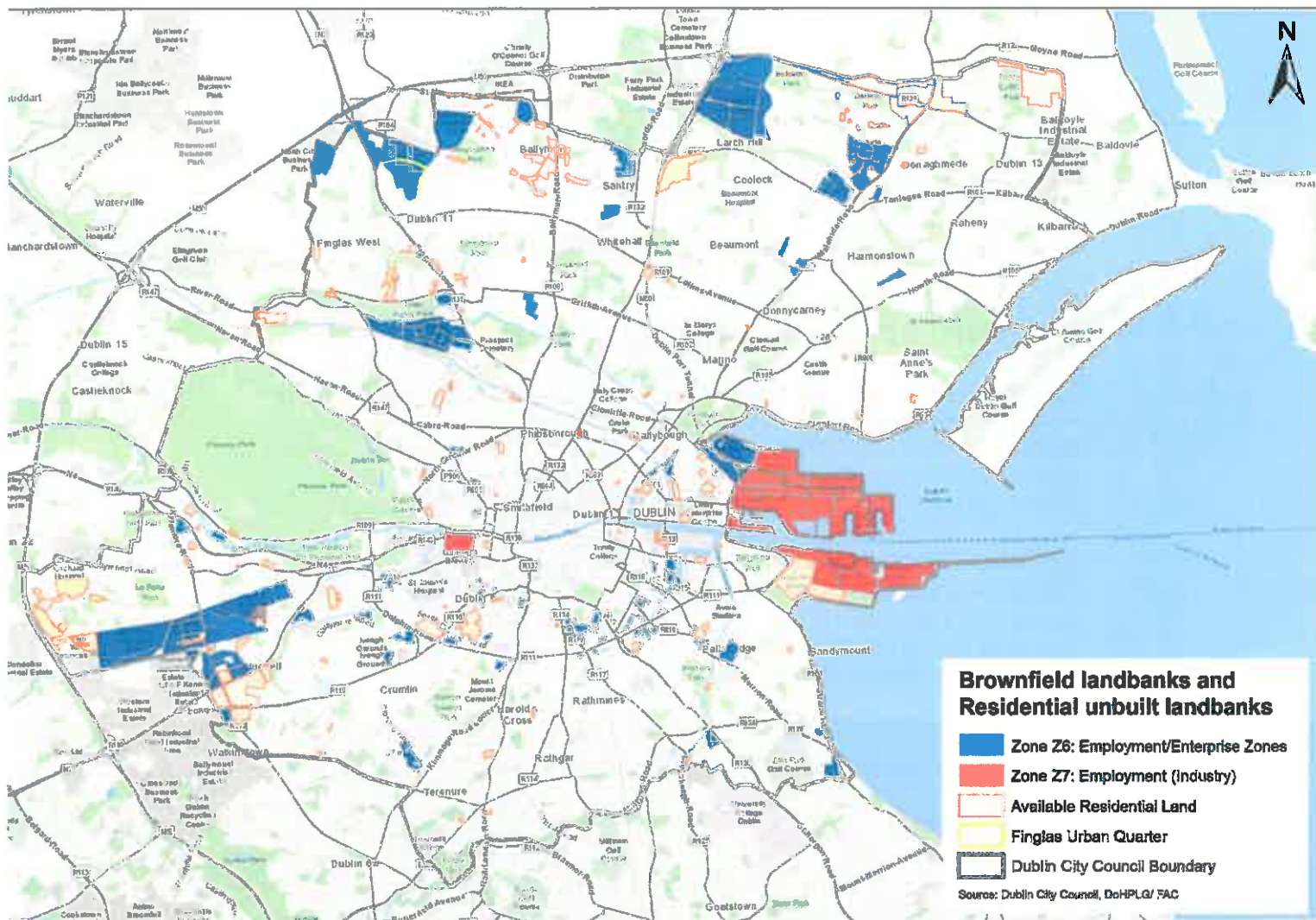


Figure 9: Existing brownfield landbanks in Dublin and existing zoned residential landbanks

Specifically, Dublin contains 863 hectares of Zone 6 (Employment and Enterprise) and Zone 7 (Industry) while there is only 322 hectares of zoned residential unbuilt land in the city. This industrial land represents significant residential potential of which Finglas Urban Quarter can be a contributor.

Hectares within Dublin City Council	
Brownfield landbanks Z6 and Z7	863
Residential zoned and unbuilt landbanks	322

Figure 10: Brownfield and residential unbuilt landbanks Dublin City Council (Source: DCC zoning & DoHPLG's Residential Land Availability Audit)

The EMRSes Dublin MASP includes a guiding principle to locate 'employment density in the right places'. This is very much supported by the Project Group as it recognises that clustering employment uses in strategic locations. It is considered that the Finglas industrial lands a) is not the right place for employment density, and b) does not presently demonstrate high employment density. For this reason, the lands should be considered along with other industrial lands for re-purposing. The specific Guiding Principle for the Dublin MASP is set out as follows:

Employment density in the right places – *Re-intensify employment within the city and suburbs, activate strategic employment opportunities to complement existing employment hubs in the city centre, and near third level institutes (EMRSes, p.67).*

SECTION 04

Finglas, not being in the city centre or near a third level institute (DCU is 3km away) clearly does not fit the above guiding principle for location of employment centres within Dublin MASP. In addition, the Finglas area shows no significant residential unbuilt land banks presently (see **Figures 10 and 11**). This is a significant risk for a Key District Centre, such as Finglas. In order to provide for residential growth, there is a sound case to be made that fits the objectives of the EMRSES to re-purpose the Finglas Industrial lands to allow for residential development as a medium density scale, providing the growth required to meet demand for housing in the area.

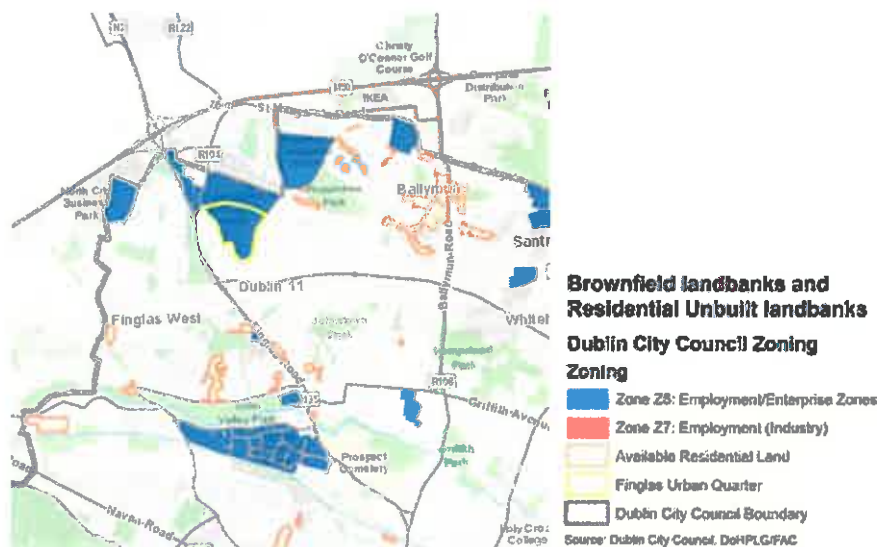


Figure 11: Existing brownfield landbanks and existing zoned residential landbanks in Finglas and surrounds

The need to allow for residential growth will become particularly will become ever more keenly felt once transport schemes such as bus connects and the LUAS extension reduces yet further travel times to and from employment centres, allowing for Finglas to become one of the most highly connected Key District Centres in Dublin.

Hectares within Finglas	
Brownfield landbanks	45
Residential zoned and unbuilt landbanks	0

Figure 12: Brownfield and residential unbuilt landbanks in Finglas. Source: DCC zoning & DoHPLG's Residential Land Availability Audit

While the EMRSES recognises that employment density should be in the right place, it fails to carry through many of the stated growth enablers of the NPF, specifically the following growth enabler for Dublin.:

Relocating less intensive uses outside the M50 ring in particular and from the existing built-up area generally. (MPF, p.37)

Disregarding stated growth enablers for Dublin included the NPF represents a serious oversight for the EMRSES, indicating disregard for the national policy hierarchy. It is submitted that this the NPF growth enablers should be incorporated in the EMRSES.

In the context of Finglas Industrial lands, this above-referenced NPF growth enabler further underlining the case for re-purposing the Finglas Industrial lands. Analysis carried out on a sample selection of industrial parks in Dublin's northern suburbs (see Figure 13) shows that Finglas industrial lands are clearly under-performing in terms of employment when compared with other industrial parks, particularly Broombridge Industrial Park, which has been mentioned specifically by DCC Head of Housing as having potential for residential re-purposing. Finglas industrial lands are therefore seen as 'a less intensive use' and should be closely considered for re-purposing to allow for regenerative uses such as office and residential to occur on these lands.

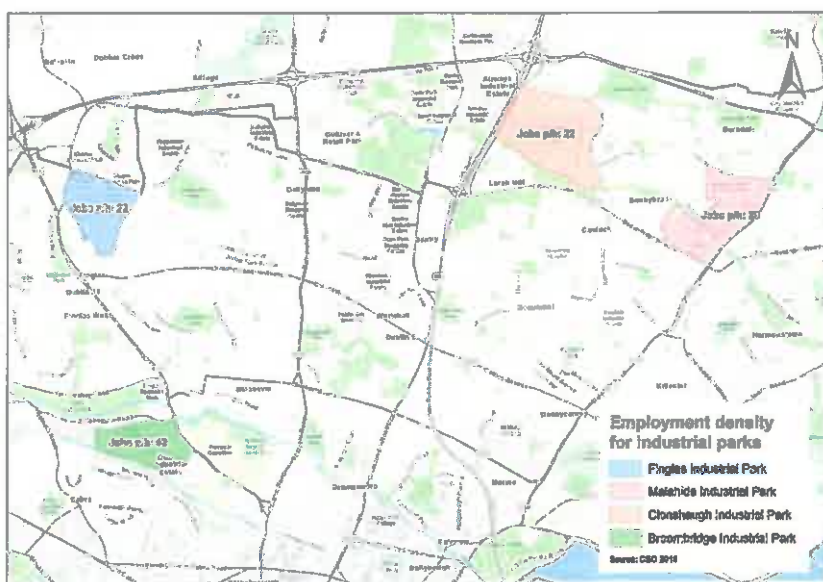


Figure 13: Existing brown-field for potential re-use existing vacant residential land in Finglas and its environs

The acceleration of the delivery of new housing is imperative in order to combat the current shortage of affordable housing which is currently distorting Dublin's housing market. This must be delivered in sufficient densities in order to make efficient use of available land in urban built up areas and must be supported by suitable services and public transport. Finglas village provides a range of essential services and amenities to the local community, and is currently occupied by two supermarkets, a post office, medical and health facilities, banking facilities, and several cafes, bars and restaurants. Finglas also contains four primary schools, three secondary schools and is 3km from Dublin City University. Further, given current and proposed public transport infrastructure Finglas is, and will be further linked to vital services within the city centre. Accelerated housing delivery in Finglas must be complimented by the intensification of employment opportunities in the city centre.

Having carried out feasibility and preliminary designs at the subject site, it is clear that many of the buildings are progressively deteriorating and in many instances unusable. Figure 14 shows an example of the poor condition of the building stock on site.



Figure 14: Deteriorating and unusable building in Finglas Industrial Park

Section 04

As a Key District Centre, the consolidation of the retail and town centre services is critical to its future development. In this way, the Project Group supports the determination by the EMRSES of Finglas as a Level 3 Sub-county Town Centre in the Retail Hierarchy for the region. Rather than limiting the town centre's development with a continuation of the limited Z6 zoning to the north of Finglas, the re-purposing of the lands at Finglas Industrial Park – only 250 metres from the centre of Finglas Town Centre – will allow for significant consolidation potential for this Key District Centre; a rare opportunity in a city with very few town centre extension opportunities.



Figure 15: Regeneration urban space (rebuild)

Finally, it is worth noting that the town centre revitalisation that a Z14 re-zoning facilities would not in any way limit the continued operations of existing facilities that are performing well in the Finglas Industrial Park or inhibit new employment-generating uses from locating in Finglas.

Recommendation: Reflecting the changed economic direction of Dublin City, existing under-performing industrial lands should be examined for re-purposing as brownfield regeneration, particularly where this will support the consolidation of Key District Centres such as Finglas.

Alongside the Guiding Principle of the Dublin MASP to 're-intensify employment in the city centre', the EMRSES should respect the planning policy hierarchy by including the NPF 'Growth Enabler' for Dublin to encourage: 'Relocating less intensive uses outside the M50 ring in particular and from the existing built-up area generally'.



CONCLUSION

The Project Group welcomes the Draft EMRSES and is supportive broadly of its ambition of consolidate Dublin City and utilise brownfield land enable growth in key areas of the city, particularly those with planned sustainable transport capabilities. The Project Group believes that Finglas is uniquely positioned to accommodate a significant proportion of population uplift envisaged by the EMRSES (60,000 within the M50 ring) with the planned LUAS extension to further increase its connectivity. The Project Group has undertaken feasibility studies and preliminary design for the Finglas Industrial Park lands only 250m to the north of Finglas Town Centre, which could unlock the potential of Finglas as a Key District Centre.

The above submission includes proposed variations to the Draft EMRSES to ensure that town centres like Finglas can realise their potential during the lifetime of the plan by for example re-evaluating existing industrial lands. Presently there is little or no available unbuilt residential landbanks that would consolidate Finglas town centre. The feasibility and site evaluations carried out by the Project Group shows that Finglas Industrial Park, with a zoning that allows regenerative uses, could be a significant contributor to the supply of residential units as an extension to the established Key District Centre of Finglas.

It is strongly felt that the inclusion of a greenfield development site such as Dunsink in the EMRSES Dublin MASP would undermine the overarching objectives of the EMRSES itself and the NPF in seeking sustainable development. As recently expressed by Dublin City Council's Head of Housing, the remaining residential landbanks in Dublin hold only limited potential compared to industrial landbanks, which hold immense potential in providing much needed lands to accommodate accelerated housing delivery.

The Project Group respectfully requests that the Eastern and Midland Regional Assembly consider closely the above submission and incorporate the recommendations set out, such that Finglas town core can evolve in a plan-led and sustainable format, integrating a mix of uses conducive to a quality urban environment

Appendix

INDICATIVE URBAN MASSING







the 1990s, the number of people with a mental health problem has increased by 50% (Mental Health Foundation 1999).

There is a growing awareness of the need to address the needs of people with mental health problems. The Department of Health (1999) has set out a vision for the future of mental health services, which includes a focus on prevention, early intervention and recovery. The vision is based on the principles of partnership, shared decision-making and recovery. The vision is to create a mental health system that is responsive to the needs of people with mental health problems and that promotes their recovery and well-being.

The vision is based on the principles of partnership, shared decision-making and recovery. The vision is to create a mental health system that is responsive to the needs of people with mental health problems and that promotes their recovery and well-being. The vision is based on the principles of partnership, shared decision-making and recovery. The vision is to create a mental health system that is responsive to the needs of people with mental health problems and that promotes their recovery and well-being.

The vision is based on the principles of partnership, shared decision-making and recovery. The vision is to create a mental health system that is responsive to the needs of people with mental health problems and that promotes their recovery and well-being. The vision is based on the principles of partnership, shared decision-making and recovery. The vision is to create a mental health system that is responsive to the needs of people with mental health problems and that promotes their recovery and well-being.

The vision is based on the principles of partnership, shared decision-making and recovery. The vision is to create a mental health system that is responsive to the needs of people with mental health problems and that promotes their recovery and well-being. The vision is based on the principles of partnership, shared decision-making and recovery. The vision is to create a mental health system that is responsive to the needs of people with mental health problems and that promotes their recovery and well-being.

The vision is based on the principles of partnership, shared decision-making and recovery. The vision is to create a mental health system that is responsive to the needs of people with mental health problems and that promotes their recovery and well-being. The vision is based on the principles of partnership, shared decision-making and recovery. The vision is to create a mental health system that is responsive to the needs of people with mental health problems and that promotes their recovery and well-being.

The vision is based on the principles of partnership, shared decision-making and recovery. The vision is to create a mental health system that is responsive to the needs of people with mental health problems and that promotes their recovery and well-being. The vision is based on the principles of partnership, shared decision-making and recovery. The vision is to create a mental health system that is responsive to the needs of people with mental health problems and that promotes their recovery and well-being.

The vision is based on the principles of partnership, shared decision-making and recovery. The vision is to create a mental health system that is responsive to the needs of people with mental health problems and that promotes their recovery and well-being. The vision is based on the principles of partnership, shared decision-making and recovery. The vision is to create a mental health system that is responsive to the needs of people with mental health problems and that promotes their recovery and well-being.

Submission to the Eastern and Midland Regional Assembly

On the Draft Regional Spatial and
Economic Strategy for the Eastern
and Midland Region

BY



Future Analytics



**vanDijk
Architects**

ON BEHALF OF
FINGLAS MCKEE PROPERTIES/SIGMA GROUP,
DAVID HAYDE PARTNERSHIP AND
KSG GROUP

