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Re: EMRA Draft Regional Spatial and Economic Strategy (RSES)

Dear Sirs,

Dun Laoghaire-Rathdown County Council (DLR) very much welcomes the opportunity to comment on the Draft Regional Spatial and Economic Strategy (RSES). As a key stakeholder in both the Dublin Strategic Planning Area (SPA) and the wider, overall Region DLR has actively engaged with, and contributed to, the RSES Technical Working Group over the last 15 months or so as the Strategy process has progressively evolved. At the outset DLR acknowledged that the 12 month timeframe originally imposed to deliver a document as complicated and all-encompassing as the Draft RSES was always going to be ambitious, particularly so given the limited resources made available to EMRA to expedite the overall process. While the submission below attempts to adopt a generic, 'high level' plane it does, sometimes, inevitably slip into the much narrower prism of a DLR perspective.

While it is appreciated this consultation process is not about the National Planning Framework (NPF) the content and thrust of the NPF is, however, fundamentally critical in terms of informing and setting the context for the nascent RSES. Notwithstanding the 'obligation' on the RSES to respect the 'regional parity' scenario espoused in the NPF, DLR has serious concerns that such a strategic national recalibration can/will be delivered upon – especially from a 'standing start' and given also the relatively short timeframe involved ie. c.20 years.

As a precursor to the more fine grain chapter-by-chapter narrative – with a particular emphasis on the MASP – a couple of more generic observations:

- A significant amount of the overall content namechecks and 're-packages' a whole raft of legislative imperatives, EU and National Directives and Guidelines, capital investment programmes and infrastructure projects/plans that are already 'out there' in the public domain. As a consequence, a large number of the c.160 no. Regional Policy Objectives (RPOs) are framed in a particular idiom, for example:
 - RPO 4.3 : *"Support the consolidation and re-intensification of infill brownfield sites to provide high density and within the existing built up area of Dublin City and Suburbs" ..*
 - RPO 7.16 : *"Support the implementation of the Habitats Directive in achieving an improvement in the conservation status of protected species and habitats in the Region..." and/or*
 - RPO 8.6 - *"The RSES supports delivery of the rail projects set out in Table 8.2 subject to..."*



Given the already existing mandatory obligations on Local Authorities to ensure statutory City/County Development Plans and/or Local Area Plans are fully consistent with, and aligned to, EU Directives and various National Guidelines/SPPR's this raft of RPOs really brings very little new 'to the table'.

- Throughout the document – but particularly across Chapters 1 to 4 - there is a significant amount of iteration, repetition and subject matter overlap that might merit some rationalisation..

Chapter 1: Introduction

- (i) The raft of empirical and evidence-based metrics and data-sets detailed in Chapter 1 are informative and do assist in scene setting but effectively reaffirms the entity that is EMRA consists of three very diverse and different spatial subsets – Metropolitan Dublin, the 'Commuter' Hinterland and the more Rural Midlands.
- (ii) As a Metropolitan County with good access to high quality public transport infrastructure the metrics that particularly resonate, from the DLR perspective, focus around:
 - The Growth Strategy continuing to focus towards cities and some regionally important larger settlements.
 - The focus on contained growth and reduced sprawl.
 - Sequential provision of critical infrastructure to unlock development sites of scale.
 - The growing shift towards smaller and single person household sizes..
 - The unsustainability of medium-to-long distance commuting patterns. (ps. 14-15)

Chapter 2 – Strategic Vision

- (i) DLR simply acknowledges the content of Chapter 2 and notes the alignment between the 16 no. Regional Strategic Outcomes (RSOs) and the overarching National Strategic Outcomes (NSOs) detailed in the National Planning Framework. (p.23)
- (ii) Given the degree of 'overlap' in subject matter a reasonably objective case could be made to 'blend' Chapters 1 and 2 into one single 'scene setting' Chapter.

Chapter 3 – Growth Strategy

- (i) As advised in previous submissions relating to earlier iterations of the Draft RSES, the Asset/Potential Based Criteria approach to the Growth Strategy (p.26) effectively espouses the fundamental building blocks of 'good spatial planning. which include, *inter alia*:
 - Commitment to compact/Smart growth to deliver effective density and consolidation – rather than a sprawl of urban/suburban development. (In this regard, based on Housing Task Force Data, DLR has 'kept the faith' with density as endorsed by the 2:1 ratio of apartments v houses currently under construction in the County. Other metropolitan Counties in the Region do not embrace this philosophy to quite the same degree!).
 - Proximity to existing and planned high quality public transport corridors, affording sustainable connectivity and access i.e. integrated land use and planning.

- Promoting the juxtaposition of, or connectivity/accessibility between, new residential developments and areas of strong employment growth as a key objective in promoting sustainable growth patterns.
 - Quality of Place.
 - The importance of third level institutions, skills, talent and human capital in fostering innovation and enterprise in locations 'where it's at'!
 - A commensurate level of sustainable, hard infrastructure provision and capacity to facilitate future growth and expansion.
- (ii) DLR welcomes and supports the narrative in Section 3.1 that "*...there is a requirement to identify which places have the greatest potential to become a focus for population and/or employment growth*". Not all locations are equally suitable to accommodate scaled growth. There has to be a degree of objective selectivity and filtering in the process - guided largely by the bullet point criteria set out immediately above.
- (iii) DLR fully supports and endorses the 6 no. Growth Enablers for the Dublin Metropolitan Area set out in Section 3.2 (p. 28).
- (iv) As an observation, there is considerable duplication and iteration between the narrative set out in "*Table 3.2 – Alternatives for RSES*" and the subsequent "*Assessment of Possible Impacts*" that is probably unnecessary and could possibly be rationalised.

Chapter 4 - People & Place (Settlement Strategy)

- (i) Early iterations of the NPF focussed very closely on growth targeted exclusively towards Dublin and the other four Metropolitan cities. This was diluted somewhat in the final NPF with the introduction of five 'lower tier' Regional Growth Centres – three of which (Drogheda, Dundalk and Athlone) are in the EMR. A similar introduction of 11 no. 'Key Towns' in the Draft RSES (Section 4.2), in addition to the identification of an, as yet, unquantified number of 'Medium-to-Large Towns' over 5,000 population ("*To be defined in Development Plans*"), is noted. DLR would have some concerns and reservations regarding possible loss of focus and further 'dilution' of the primary objective to promote sustainable compact growth around the core principles of high quality public transport corridors and consolidation, re-intensification and/or redevelopment of underutilised brownfield and infill urban sites. (p.38)
- (ii) Taking Account of Existing Plans (p.42) – The various imperatives around pro-active land management, prioritisation, monitoring and coordination are acknowledged.
- (iii) Headroom (p.42) – DLR welcomes the more measured, nuanced and considered position set out in the Draft RSES relating to 'headroom' - in terms of the greater degree of flexibility it appears to offer, particularly in the short-to-medium term. The reference that "*Application of headroom is particularly relevant to urban areas – particularly the five cities*" is especially welcome having regard to the continuing significant level of planning activity currently being experienced in the Dublin Metropolitan Area .

In relation to the narrative around "*...some transfer of projected growth to their wider metropolitan areas is appropriate*" requires proper and considered qualification. The NPF states, in relation to any 'reallocation' of headroom, "*This would be subject to any growth relocated from the city and suburbs comprising compact development, such as infill or a sustainable urban extension, served by high capacity public transport and/or significant employment and amenity provision*". To ensure

proper strategic policy alignment between the NPF and the RSES the Draft RSES reference to "...some transfer of projected growth to their wider metropolitan areas..." needs the addition of the above qualification i.e. "...served by high capacity future transport and/or significant employment and amenity provision" – the net consequence of which will be to significantly limit the number of locations in the wider Metropolitan area that could avail of such a 'reallocation'.

From an admittedly parochial perspective, given the depth of high quality public transport corridors traversing the County – DART, Luas, QBCs and the planned MetroLink – and the co-location of high intensity employment nodes on these corridors (at Cherrywood, Sandyford Business District, Dún Laoghaire and Blackrock) DLR would be of the view that this County is very well placed to benefit from potential additional capacity afforded by the new headroom metrics.

- (iv) Measuring Delivery (p.43) – DLR have some concerns regarding the narrative "...it will be necessary for Planning Authorities... to act to encourage greater competition in the delivery of output, particularly at priority locations" and would welcome some clarification as to what enabling tools or mechanisms might be made available to Local Authorities to expedite such an objective.
- (v) Rural Areas (p.63) – DLR fully supports and endorses RPO 4.53 targeted at managing urban generated growth in "*Rural Areas Under Strong Urban Influence*".

Chapter 5: Dublin Metropolitan Area Strategic Plan (MASP)

- (i) Vision (Section 5.2) – The final paragraph at the foot of the first column (p66) is unnecessarily negative in tone. Without seeking to 'gloss over' the socio-economic realities and disparities across the Region, the various references to "*perception*", "*...crime, dereliction and poor quality public realm*" and "*...areas of ongoing deprivation...*" are highly emotive and send completely the wrong signals. These should be excised or at least tempered in some fashion e.g. replace "*deprivation*" with '*socially disadvantaged*'. Without seeking to introduce 'fake news', the MASP 'story' should be 'selling' the Dublin Metropolitan Area as an international 'player', a FDI location of choice and a major gateway to Europe. Attached as Appendix A is a short bullet point narrative conveying a number of such points which you might consider incorporating into the finalised RSES.
- (ii) Guiding Principles (p.67) – Having regard to the somewhat contrived Dublin City and Suburbs boundary shown on Figure 5.1, DLR very much welcomes the additional narrative "...or contiguous to..." to the Compact Sustainable Growth section of the Guiding Principles for Growth. This acknowledges the reality of a number of strategic and fully serviced greenfield development sites on existing/planned public transport corridors at the very edge of the City and Suburbs boundary e.g. Cherrywood SDZ, Woodbrook-Shanganagh.
- (iii) Strategic Corridors (Section 5.4) – Page 70 effectively reiterates the information contained in the Infographic on p.69. Are both really necessary?
- (iv) Integrated Land Use and Transportation (p.72) – DLR is fully supportive of, and wedded to, the principle of effective integration of land use and transportation as a fundamental 'building block' underpinning the promotion of sustainable compact growth.

- (v) Strategic Development Corridors (p.76-77) - DLR fully endorses Table 5.1, which sets out in some detail, and comprehensively captures, all of the strategic development/redevelopment areas of scale across the County. The original selection of DLR's strategic sites by the Planning Authority was guided by the criteria outlined in the NPF's "*National Strategic Outcomes*" - particularly in relation to seeking a 'compact/Smart Growth approach' to deliver effective density and consolidation, rather than a sprawl of urban development. The sites were also selected around the imperatives of proximity to existing and planned high quality rail-based public transport, in order to ensure a transition to more sustainable modes of travel (walking, cycling, public transport) - again in accordance with National Strategic Outcomes.
- (vi) Core Strategy (p78) - The considered narrative around demonstrating the capacity of corridors and the potential for "... *significant additional capacity through infill and re-use of underutilised lands ...*" is to be welcomed, as is the supplementary reference to "...*retaining flexibility to respond to new and future opportunities...*".
- (vii) Housing Deliver and Phasing (p.79) - The 2031 'end of life' timeline of the RSES does not align neatly with the 2040 horizon for the NPF. Experience has shown that the timeline for the delivery of major capital infrastructure projects can sometimes be measured in decades. DLR last rezoned significant lands for residential development as part of the 2004 County Development Plan process. Almost 15 years has elapsed since that rezoning and some of the lands remain effectively un-serviced for development, albeit with key infrastructure projects now at various stages of advancement both by DLR and national agencies such as Irish Water and the NTA.

If the MASP process is to take a longer-term planning horizon than the statutory 6-year County Development Plan, the use of short-to-medium term housing/population allocations may prove unsuited to the longer-term infrastructural planning timescales that have been a feature of planning and development activity in Metropolitan Dublin over the last two decades. The MASP process should possibly look beyond the land use zonings that can cater for immediate/short term demands and provide a mechanism for identifying 'where next' for development activity, in order to ensure a coordinated and timely approach to future infrastructure delivery. The use of a 'strategic residential reserve' zonings or similar mechanisms might also be considered in this regard.

- (vi) Employment Generation (ps.80/81) - DLR welcomes Table 5.2 which name-checks strategic employment development nodes in the Dublin Metropolitan Area. The nascent Cherrywood 'New Town' and Sandyford Business District will be the primary focus for future High Intensity Employment (HIE) growth in the County over the lifetime of the MASP. There could be a case to be made for the RSES to define a specific policy approach to HIE locations across the Region – separate from other employment areas.

Chapter 6: Economy & Employment

- (i) The overall thrust of the RSES aligns well with DLR's strategic goals of creating a sustainable, competitive, inclusive and resilient County. The narrative that good projects will be supported and the overall principle that economic growth should align well with relevant resources is very much welcomed. DLR is currently making significant efforts to engage with, and support, a range of economic activities across the wider Region and provides excellent supports through its LEO office. A new 'Economic Team' is also being developed to support the broader commercial base.

- (ii) In relation to the Guiding Principles underpinning Strategic Employment Development (p.91) DLR is in a strong position to deliver on the goals and objectives of the RSES. Significantly, the County has the necessary critical elements in place which will enable rapid and identifiable progress to be made in ways that align with the fundamental principles of the economic 'elements' of the new RSES. The County has a strong Third Level presence, will have over 500,000sq.m of additional commercial space at various stages of availability over the next six years, excellent public transport infrastructure and a vibrant and well-connected commercial base.
- (iii) DLR welcomes the RSES acknowledgement (p.94) that Greater Dublin is the only Irish metropolitan area of global scale and importance capable of competing on the international stage against other similarly scaled metropolitan areas worldwide.
- (iv) DLR very much welcomes the commitment of EMRA in RPO 6.9 (p.98) to prepare a new Retail Strategy for the Region to replace the earlier (2008) Retail Strategy, which was prepared in a very different economic climate and is, consequently, no longer fit for purpose.
- (v) The Development Plan obligations on Local Authorities arising from RPO's 6.11 and 6.12 (p.99) - focussed on Town Centre place making and renewal - are to be welcomed.
- (vi) Destination Towns (p. 101) – It is the intention of the DLR LEO to seek designation of Dun Laoghaire as a Destination Town. In addition to excellent transport links there are a raft of place making and other projects - either completed, underway or planned - which will further add to its attractiveness to both domestic and overseas tourists.
- (vii) Marine Economy (RPO 6.19) – Surprisingly, given the coastal location of the County, the marine sector is one that has traditionally been under-represented. The LEO is specifically targeting the Marine Economy with expressions of interest being sought to repurpose the Dun Laoghaire Ferry Terminal.(p.101)

Chapter 7: Environment

- (i) While Chapter 7 is relatively lengthy (c. 30 pages long), and much of the narrative makes for interesting and informative (background) reading, from an objective perspective it is debateable how much the suite of Regional Policy Objectives (RPOs) contained in the Chapter actually contribute to the Strategy! The Chapter is very heavy on overarching EU and Irish National legislative background and obligations. At the end of each sub-section nearly all the RPOs are in the idiom "*will support*", "*will promote*" and/or "*Local Authorities shall incorporate...*" already extant EU/National obligations and/or policy/programme initiatives. RPO 7.25 (p.129) confirming EMRA's commitment to prepare a Regional Landscape Character Assessment to promote better landscape management and planning across the Region is acknowledged.
- (ii) In relation to Climate Change, the role of the newly established Climate Action Regional Offices and their remit to formulate Regional Climate Change Adaptation Plans is welcomed. (p.134)

Chapter 8: Connectivity

- (i) DLR is supportive of, and fully endorses, the fundamental cornerstone underpinning the 'sustainable compact growth' imperatives of the NPF/MASP regarding juxtaposition of (i) high

intensity employment nodes, and (ii) residential development of significant scale with high quality public transport corridors. (ps. 146-146). Dublin does possess a network that is functional and provides reasonable commuting connectivity across both the Metropolitan area and beyond into the 'Commuter Counties'. Stated NDP funding commitments to MetroLink (€3 billion), DART and Luas Expansion Programme (€2 billion) and BusConnects Dublin (€2 billion) will further copper-fasten and increase the overall capacity of the Metropolitan public transport infrastructure network (all by 2027) facilitating the continuing compact growth of the Region. DLR notes the proposal in RPO 8.5 to prepare Local Transport Plans (LTPs) "*...for selected settlements in the Region*". DLR would welcome clarification as to the settlements in question. (p.146)

- (ii) In relation to 'International Connectivity' DLR supports both the MASP's and the NDP's recognition of Dublin as the primary 'Global Gateway' in the Country (p.154). NDP fiscal commitments to signature projects such as the second runway (€240 million) and Visual Control Tower (€50 million) at Dublin Airport and the Dublin Port Redevelopment Project (€230 million) – (which will proof the port in terms of facilitating larger sized vessels into the future) simply reinforce this recognition of Dublin as the principle conduit of people and freight into and out of the State.

Chapter 9: Quality of Life

- (i) DLR concurs that continuing constraints in relation to the delivery of required levels of housing supply, in conjunction with exponential increases in the cost of renting residential property (p.162), are a major problem that could, if not corrected, potentially derail the continued sustainable growth of the Region.
- (ii) DLR notes the mandatory obligation on Local Authorities to undertake Housing Need Demand Assessments (HNDAs) for their administrative areas. Given the 'fluid' nature of the Dublin Metropolitan Area housing market, DLR would support the RSES proposal (p.162) for a composite 'four Dublin's' HNDA.
- (iii) DLR welcomes the iteration of "*...or contiguous to...*" in relation to RPO 9.9 'Compact Urban Development' (p.164).
- (iv) DLR considers the overarching Guiding Principles around urban/brownfield regeneration sites are robust, measured and reasonable (p.164) but would welcome further clarification regarding the intended mechanics and the practical implementation of the proposals around CPOs and "*... other incentives, including development contributions, to encourage urban regeneration of brownfield lands over the development of greenfield sites...*" as set out in RPO 9.11.
- (v) The actual mechanics around the designation of new school sites in statutory plans (RPO 9.16) will require further clarification and explanation. (p.168)

Chapter 10: Infrastructure

- (i) DLR acknowledges the stated concerns and potential consequences relating to delays in delivering the Eastern and Midlands Water Supply Project (the 'Shannon Scheme'). Any

interminable delays in advancing this project could derail the growth of the Region on a number of levels. (p.176).

Chapter 12: Implementation and Monitoring

- (i) The monitoring and reporting arrangements required by legislation (p.190), including the obligation on Local Authorities to submit a 'progress report' to the Regional Assembly every two years are acknowledged.
- (ii) DLR welcomes and supports the proposal (p.191) to establish a RSES Implementation Group to oversee progress on the implementation of the Dublin MASP (RPO 12.1). In the interim, and in advance of (a) the final adoption of the RSES and, (b) any formal establishment of the MASP Implementation Group, DLR considers there would be merit in continuing an ongoing engagement and dialogue between EMRA and the MASP Local Authorities – to both discuss evolving matters of mutual interest and to address issues emerging from the RSES process.

Some minor typos:

- P15: Travel Patterns – No Figure 1.11
- P69/70: The content of both pages is virtually identical. Could be rationalised?
- P73: East Coast Route from Sutton to Sandycove (not Sandymount).
- P76: Woodbrook-Shanganagh Strategic Development Site is in DLR not Wicklow.

Should you have any queries regarding any aspect of this submission please do not hesitate to contact my colleague Dave Irvine, Senior Planner, on (01) 2054760.

Yours faithfully,



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Dún Laoghaire-Rathdown County Council

Appendix : Narrative for MASP Vision

The Dublin Metropolitan Area is in a strong position to grow and strengthen its standing as centre of excellence, a location of choice and a gateway to Europe. Over the last two decades the metropolitan area has invested in the infrastructure that supports existing communities and provides for future growth including:

- Extending and integrating our transport networks across all modes of transport
- Enhancing capacity at Dublin Airport through the provision of a second terminal
- Expanding the capacity of our water services
- The delivery of an incinerator to cater for the capital's waste management needs
- Investment in the expansion of our third level educational institutions located across the metropolitan area
- Support for the Arts with the delivery of the Bord Gas Theatre, investment in The Abbey and in municipal theatres. The expansion of the National Gallery and other national treasures.
- The development of the National Conference Centre
- Significant investment in sports facilities
- The investment in green and blue infrastructure in the form of parks, green ways, water facilities to enhance the environment for all.

The Metropolitan area is now a multicultural centre attracting the world's largest companies while creating an environment that nurtures start-ups.

The Metropolitan Area has planned for future growth that is built on the investment to date and provides clear direction for future growth and investment - meeting the needs of the communities while protecting the environment for future generations.