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23rd January 2019

Ref: Draft Regional Spatial & Economic Strategy 2019-2031 for the Eastern and Midland Region

A Chara,

Fingal County Council (FCC) in support of the shared vision of the draft Regional Spatial & Economic Strategy (RSES) and, the Metropolitan Area Strategic Plan (MASP) within it, would like to take this opportunity to recognise the significant collaborative efforts undertaken by the Eastern and Midland Regional Assembly (EMRA) to facilitate its coproduction. The top-down and bottom-up approaches have complemented each other during the process and allowed the Local Authorities to play a vital role in identification of its own context and to influence and properly inform the formulation of the draft RSES.

FCC in making this submission acknowledges EMRA's consideration and inclusion of our previous inputs from the Strategic Planning Area Committee and the Technical Working Groups; feedback on working draft documents & submissions; and welcomes the opportunity now to further shape the RSES. As such, this submission does not need to reiterate previous observations instead it focusses on recommendations to provide greater clarity, particularly in respect to the steps to transition [see section (a) below] and also to strengthen the centrality of natural and built heritage to regeneration and development [see section (b)].

(a) Steps to transition

The Implementation Roadmap for the National Planning Framework (NPF) establishes that a period of transition will operate to 2027. The NPF roadmap recognises the step change that is required and outlines that the RSES process will address this issue both in the short-to-medium term transitional and longer term context. The draft RSES and MASP do

acknowledge these horizons and identifies the need to be future thinking, having regard to the long lead in time for planning and development, whilst also being adaptive and flexible to respond to external risks and future innovations.

The draft MASP does make clear that the further allowance to transfer transition population targets from the 'city & suburbs' shall only apply to the three Metropolitan Key Towns in the MASP namely Swords, Bray and Maynooth. However, the draft does not provide detail on the application of such transition population targets. It is, therefore, suggested that by providing for a prioritised and sequential allocation of the transferred population, taking into account the long lead in time for planning and development, will provide the appropriate framework for the formulation of the core strategies of the three Metropolitan Key Towns.

The National Planning Framework (NPF) directly identifies Swords, in Fingal, as an example of where up to 20% of the phased population growth targeted in the 'city & suburbs' could be accommodated in the wider Dublin Metropolitan Area (DMA) as supported by National Policy Objective (NPO) 68. It is clearly stated in the NPF that this proportion of transition population targets is in addition to growth identified for the DMA.

As such, it is strongly advocated that the MASP establishes the priority of allocation of the transitional population growth for the Metropolitan Key Towns to align with the significant level of National Development Plan (NDP) investment underpinning the NPF and deliver on Regional Strategic Outcome (RSO) 6 with respect to the proper integration of transportation and land use planning. The transfer of projected growth to the Metropolitan Key Towns could, it is suggested, be determined utilising a refined version of the 'health-place' check list as contained in Appendix C of the draft RSES.

FCC welcomes the supporting Regional Policy Objectives (RPOs) for the Metropolitan Key Town of Swords contained in Chapter 4 of the draft. However, consideration should be given to more strategic RPOs for each of the Key Towns, including Swords. We have appended suggested text to this letter.

As you are aware, FCC has to date carried out a significant body of background work, consultation, building and site acquisitions within the context of the *Strategic Vision 'Your Swords'* and *Swords Masterplan* documents. Given that the aspirations of this strategic thinking are now beginning to become a reality, in the context of Metrolink, it is a key objective to facilitate the strategic regeneration and development of Swords in line with draft RPO 4.26. Making steps towards achieving this objective FCC have recently been successful in securing funding for the healthy place making strategy 'Sustainable Swords' under the Urban Regeneration and Development Fund (URDF) as part of Project Ireland 2040.

Furthermore, the sustainable and resilient urbanisation of the DMA facilitated through well designed higher density development is required to ensure the optimum functioning of the €3 billion investment in Metrolink. Investments in infrastructure guide the development opportunity areas. As such, given that passenger services on the new high capacity, high frequency cross-city rail corridor serving critical destinations such as Swords, Dublin Airport,

Dublin City University, Ballymun and the Mater Hospital and on to Sandyford are planned to commence in 2027 the MASP should clearly prioritise and proportion appropriately the transitional population allocated to Swords in line with the associated new transversal cross-city transport investment priorities.

Aligning with our submission to the Issues Paper, dated the 16th February 2018, the draft RSES is responsive to those areas which require an element of 'catch-up' to reach an acceptable place standard. The identification, by way of example, of Balbriggan, Kinsealy-Drinan and Lusk in Section 4.7 of the draft is welcomed. FCC agrees that a contained focus with a drive for investment in services, employment growth and Infrastructure (both soft and hard infrastructure) whilst balancing housing delivery is the appropriate strategic outlook for such towns. To reinforce this outlook it is recommended that a Regional Policy Objective be added in to this section, for example:

RPO: In Development Plan Policy Local Authorities shall identify medium to large towns with:

- (i) a moderate level of jobs and services, including sub-county market towns and commuter towns, with good transport links and capacity for continued commensurate growth to become more self-sustaining; and
- (ii) high levels of population growth and a weak employment base which are reliant on other areas for employment and / or services and which require targeted 'catch-up' investment to become more self-sustaining.

The initial €10 million rejuvenation project 'Our Balbriggan' provides one current example of action being undertaken by FCC to assist with the 'catch-up' of such an area. In addition, FCC has also successfully secured funding under the URDF for Balbriggan to further the physical, economic and social transformation of the town.

(b) Centrality of natural and built heritage to regeneration and development

With respect to the central role the natural and built heritage has to regeneration and development of areas Section 6.5 of the draft RSES does identify that the landscape and heritage are the key drivers for the promotion of Ireland's tourism. However, it is also acknowledged that they are a finite resource with varying degrees of carrying capacity. It is, therefore, recommended that RPO 6.14 be amended to include the following text:

RPO 6.14: ...All Visitor Experience Development Plans should include policies that shall enhance the visitor experience to the Region and protect the archaeological and architectural integrity and character of such sites.

A number of recommended text changes within the main body text with respect to the natural and built heritage include the following:

- Page 114 a revised description of Maritime Heritage to include other cultural remains, such as harbours, jetties, landing places, fish traps, kelp grids, bridge sites, crannogs and tidal mills as well as submerged landscapes.
- Taking into account that diving on wrecks over 100 years old requires approval by licence issued the Minister for Culture, Heritage and the Gaeltacht amend the paragraph beginning "Ship wreck sites over 100 years old" (Page 114) by deleting the sentence "which could include diving on wrecks".
- Table 7.1 for clarity change text "See also Record of National monuments" to Record of Monuments and Places (RMP) and National Monuments in State Care: Ownership & Guardianship and the Register of Historic Monuments.
- Page 172 under sub-section Archaeological Heritage amend "layers of architectural history" to "layers of archaeological history".
- Amend RPO 9.23 (Page 173) to add in 'heritage' as per underlined text - "Promote and facilitate the role of arts, culture and heritage..."

To conclude, FCC continues to support the on-going co-creation of the RSES and welcomes this opportunity to further input. Should you have any queries or wish to discuss this matter please contact Matthew McAleese, Senior Planner of this office on [REDACTED] or [REDACTED]

Yours sincerely,



AnnMarie Farrelly
Director of Services
Planning and Strategic Infrastructure Department

Appendix A – Key Town Text

Swords

Due to its strategic location in proximity to Dublin city, the airport, national road network and with the planned Metrolink, Swords acts as a Key Town for the Metropolitan area. Swords is the County town in Fingal and is a major town with a young and growing population of over 39,000 people in 2016 and which provides a strong economic and service function for its catchment. Key priorities are to promote compact growth and enhanced public realm in the town centre along with the planned sequential development of Swords.

Swords is located in the Dublin Metropolitan Area and is included in the MASP (see chapter 5) and is located on the Metrolink Corridor.

Regeneration The Sustainable Swords project (funded under the Urban Regeneration and Development Fund (URDF) as part of Project Ireland 2040) will consolidate and strengthen Swords historic Town Centre. The identity of the town centre will be enhanced through the development of Swords Civic Centre and Cultural Centre, the delivery of the conservation plan for Swords Castle, and the delivery of an enhanced public realm in Swords Town Centre, in accordance with a new healthy place-making strategy. Additionally, core recreational and amenity spaces will be promoted, in particular Ward River Valley Park, Swords Cultural Quarter including Town Park, Ward River Walk west of Main Street area.

Residential Development Key to the success of Swords will be the strengthening of the role of Main Street, with a focus on compact growth and targeting infill development. Residential development, in the shorter term, is mainly directed to the western and southern areas of the town. With longer term development directed towards Lissenhall. This strategic landbank offers the opportunity for the development of a vibrant, attractive and well-connected mixed use urban district on the northern side of Swords within 1km of the MetroLink corridor. The development of the area follows the sequential development of Swords and is in keeping with the Council's long-term strategic vision for the town.

Economic Development The strategic regeneration of Swords offers an opportunity to build on the existing resilience of the local economy. There are opportunities to create a strategic employment node maximising opportunities presented by Swords' strategic location well served by air, MetroLink and the national road network, and all within a high quality sustainable environment. Furthermore, the Swords-Dublin Airport functional unit has developed as a key location for industry and employment generating activities. Ensuring high skilled employment opportunities are provided for residents of Swords is a key objective of the economic development approach for Swords. Airport related activities will continue to be of major importance for the area.

Enabling Infrastructure The delivery of Metrolink in co-ordination with other public transport proposals, including the Bus Rapid Transport/Busconnects and Park and Ride programmes and electric vehicle charging infrastructure is crucial for the future sustainable development of Swords. There is significant potential to transition towards sustainable and low carbon transport modes in Swords through the provision of high quality walking and cycling permeability offering direct routes to local destinations and public transportation hubs. Improvements to the road and cycle network are required to capitalise on this, together with the

delivery of new road infrastructure. Swords is identified in the Fingal Spatial Energy Demand Analysis as having high heat densities high enough to be feasible for connection to district heating systems.

Regional Policy Objectives: Swords Key Town

RPO 4.24: Support the continued development of Swords as a vibrant Key Town with a thriving economy; an integrated public transport network; an attractive and highly accessible built environment with the highest standards of housing, employment, services, recreational amenities and community facilities.

RPO 4.27: Facilitate the strategic regeneration of Swords to build on the resilience of the local economy and provide for an enhanced urban environment with a particular focus on the development of Swords Civic Centre and Cultural Centre, the delivery of the conservation plan for Swords Castle, and the delivery of an enhanced public realm in the town centre and to promote recreational and amenity uses in accordance with a healthy placemaking strategy.

RPO 4.25: Support the regeneration of underused town centre lands along with the planned and sequential infill opportunities to provide for high density and people intensive uses in accessible locations that are accessible to high quality transport, existing and planned, and support the preparation of a Local Area Plan for the strategic landbank at Lissenhall for the longer-term development of Swords.

RPO 4.26: Support the economic functional unit of Swords-Dublin Airport as a key location for industry and intensive high value employment by enabling conditions for creating and sustaining jobs.

RPO 4.28: Encourage transition towards sustainable and low carbon transport modes in Swords through the provision of high quality walking and cycling permeability offering direct routes to local destinations and public transportation hubs.