

Chief Executive's Office

Eastern & Midland Regional Assembly,
3rd Floor North,
Ballymun Civic Centre,
Main Street,
Ballymun,
Dublin 9,
D09 C8P5.

12th April 2019

**Submission on the Eastern & Midland Regional Assembly
Proposed Material Amendments to the Draft Regional Spatial and Economic Strategy (March 2019).**

Dear Sir or Madam,

South Dublin County Council (SDCC) is pleased to contribute to the preparation of the Eastern and Midland Regional Assembly (EMRA) Regional Spatial and Economic Strategy (RSES). SDCC previously made a submission on the Draft RSES in January 2019 and the following outlines SDCC's comments in relation to the proposed material amendments to the Draft RSES published in March 2019.

1. Naas Road/Ballymount

SDCC supports proposed material amendment No. 72 as it relates to Naas Road / Ballymount. The proposed amendment to Table 5.1 provides clarification as to the location of these brownfield lands, in both South Dublin County Council and Dublin City Council administrative areas, and their potential use for residential development and more intensive employment/mixed uses in the context of brownfield regeneration. The inclusion of a new Luas stop as a medium to long term phasing / enabling infrastructure requirement to facilitate the regeneration potential of these lands is a welcome, and necessary, inclusion.

2. Strategic Employment Development Areas

It is noted that proposed material amendment No. 77 proposes to include Knocklyon as a strategic employment development area. SDCC is cognisant of the qualities and attractiveness of the Knocklyon area as a place to live, work and do business, and is generally supportive of proposals which will provide increased employment within the County. Notwithstanding this, it is not clear how Knocklyon will function as a strategic employment development area on a regional scale as proposed under proposed material amendment No. 77 having regard to the guiding principles to identify locations for strategic

employment development (Section 6.3 of the Draft RSES), the limited availability of development land in this area, the absence of existing major employment centres and the predominance of built out residential zoned lands.

SDCC considers that the Tallaght Town Centre/Cookstown area is better equipped to fulfil this role for the general south west Dublin City and Suburbs area and would be more appropriately designated as the strategic employment development area. The Tallaght Town Centre/Cookstown area is clearly identified on Figure 6.5 and 6.6 as being one of the highest concentrations of enterprise development and innovation assets in the region and fulfils all of the guiding principles for strategic employment development areas 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 a significant bank of regeneration lands for more intensive uses, proximity to public transport, proximity to existing residential areas and future population growth centres.

It is therefore recommended that proposed material amendment No. 77 be further amended to omit reference to Knocklyon and include Tallaght Town Centre/Cookstown as a strategic employment location within the south west corridor with "potential for intensification of industrial lands and development of new mixed-use district".

SDCC submits that the identification of the Tallaght Town Centre/Cookstown area as a strategic employment centre would not constitute a material amendment. The area is identified in Table 5.1 of the Draft RSES as a strategic location for "regeneration of brownfield lands", and reference to the area as a strategic employment development location would merely provide clarification that the area is suitable for major employment, as well as residential, development consistent with the existing status of the area and the policy support and guiding principles for strategic employment locations which exist within the Draft RSES.

It is considered that proposed material amendment No. 76 is an unnecessary addition to Section 5.8 Employment Generation. Rather than create ambiguity, the proposed material amendment should be omitted.

3. Strategic Infrastructure

SDCC strongly supports any proposal to provide additional forms of public transport to, from and within South Dublin County. However, the RSES is statutorily obliged to support the implementation of the 'National Planning Framework - Project Ireland 2040' and the economic policies and objectives of the Government and ensuring that the Strategy is consistent with the National Transport Authority's Transport Strategy for the Greater Dublin Area.

It is considered that the inclusion of proposals which have no support in national plans and policies would merely delay and prejudice the RSES as a whole and would furthermore undermine key projects which are supported by national plans and policies and are rightly included within the RSES. The hierarchy of plans must be consistent to enable Planning Authorities to make appropriate decisions on future development areas and land use zoning in preparation of Development Plans.

As noted in the Director's Report on the consultation process of the Draft RSES for the EMRA:

"With regard to the proposals for a new Metrolink route and orbital light rail connection, the Metrolink project is stated in Project Ireland 2040 as Sandymount to Dublin Airport and Swords,

there is no reference to a revised route to the South of the city Dublin in national policy or are they sufficiently developed for inclusion in the RSES. The route selection process for Metrolink is ongoing and being delivered by TII and NTA, any policy position on this route in the RSES would be prejudicial to that process and therefore the RSES should not support such a proposal. PI 2040 also includes various LUAS lines and these are supported in the RSES, there is no current proposal for an orbital LUAS at this location and again the RSES should not support such a proposal.”

While noting the above, SDCC will endeavour to promote investment in improved public transport links at the appropriate level in the interests of proper planning and sustainable development and seek to implement those projects which achieve support.

4. Green Infrastructure and Amenities

SDCC welcomes the use of the EU definition of Green infrastructure, as put forward in our submission to the Draft RSES consultation, in the interests of clarity and consistency.

SDCC reaffirms our support for the inclusion of strategic natural, amenity and cultural heritage assets within South Dublin County in Table 7.1 and welcomes the further additions to Table 7.1 contained in proposed material amendment No. 97. The assets of strategic importance within South Dublin County include, but are not limited to, the following:

Lakes, Rivers and Canals:	Liffey, Dodder, Grand Canal.
Greenways, blueways:	Grand Canal Greenway, Canal Loop Greenway (linking the Grand and Royal Canals), Dublin Mountains Way.
Uplands:	Dublin and Wicklow Mountains.
Parks:	Tymon Park, Dodder Valley Park, Griffeen Valley Park, Corkagh Park are regional parks of between 100 to 200 hectares in area.
Heritage sites:	Clondalkin (Clondalkin Round Tower), Rathfarnham (Rathfarnham Castle).

While it is noted that the Director’s Report on the consultation process of the Draft RSES for the EMRA states that Table 7.1 “*are not intended to be a complete list of the assets in the Region*”, it is considered that this was not clearly reflected in the Draft RSES, in the Material Amendments or in any of the Director’s recommendations. SDCC is concerned that lack of clarity on this issue will have the unintended consequence of creating a hierarchy of strategic natural, amenity and cultural heritage assets. If clarification is not forthcoming in the RSES to be adopted, and having regard to the inclusion of suggested additions from other submissions to the Draft RSES, SDCC puts forward the additional strategic assets highlighted in red above for inclusion in Table 7.1.

SDCC welcomes proposed material amendment No. 126 to support development of regional scale open space and recreational facilities adjacent to growing population centres and considers that this further underlines the need to include the above referenced regional parks within South Dublin County within Table 7.1, as recommended.

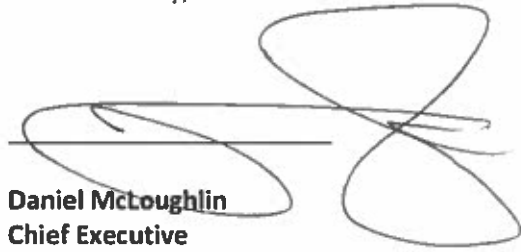
Conclusion

South Dublin County Council is committed to delivering a plan led approach for development of the Region, supporting and implementing national and regional objectives which are consistent and clear. 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, Kilcarbery, Naas Road/Ballymount and Tallaght Town Centre/Cookstown 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,



Daniel McToughlin
Chief Executive