



Comhairle Cathrach  
Bhaile Átha Cliath  
Dublin City Council

An Roinn Phleanála & Forbairt Maoin  
Oifigí na Cathrach, An Ché Adhmaid, Baile Átha Cliath 8  
**Oifigeach Poiblí Ainmnithe faoin Acht um Bristocalreacht a Rialáil 2015**

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Submission on the Eastern & Midland Regional Assembly  
Draft Regional Spatial and Economic Strategy (November 2018)

Dear Sir or Madam,

***Comments from Dublin City Council***

Dublin City Council welcomes the publication of the Draft RSES and appreciates the work by EMRA in developing the strategy, which provides a strategic vision for the region, consistent with the National Planning Framework. Dublin City Council is also appreciative of the consultation to date and now having the opportunity to comment on the draft strategy.

Dublin City Council would like the following comments to be taken into consideration prior to finalising the strategy. These are arranged by theme hereunder, with reference to the relevant sections.

**Introduction (Chapter 1)**

This section is well set out and provides useful context.

**Strategic Vision (Chapter 2)**

The strategic vision provided in this chapter is also welcome.

In relation to Regional Strategic Outcomes (S. 2.3) p23, both 'enhanced GI and ecosystem services' and 'enhanced biodiversity' are listed. Some GI functions may be of greater value than others in terms of ecosystem function, and specific indicators could be referenced within the document.



## Metropolitan Area Spatial Plan (Chapter 5)

Dublin City Council welcomes the particular attention given to the Dublin Metropolitan area, and the 12 year time frame which can guide the future direction of successive development plans. This Chapter is particularly welcome given its role in guiding the future strategic development of the metropolitan area. This is much needed given pressure for urban-generated development beyond the city and suburbs and into the rural hinterland. The locating of future urban development at appropriate locations will assist in consolidating the city, facilitating the planning and provision of quality public transport, and in turn assist in the sustainably expanding the city's economy.

Dublin City Council is eager to see the development of appropriate brownfield and infill sites in the city. Some of these sites are dependent on infrastructural development/investment and can be costly to develop for other reasons such as demolition or decontamination requirements. Nevertheless they can facilitate sustainable development by reason of their proximity to employment, amenities and public transport, and can support high density residential and employment uses. It is considered that development of less sustainable sites in rural hinterland areas should not take place at the expense of these sites, particularly where such rural development may be urban generated.

The second point under section 5.3, supports the above perspective, ie "... at least 50% of all new homes within or contiguous to the existing built up area in Dublin ..", yet there is the possibility that this could facilitate continued growth at the urban fringe/periphery at the expense of centrally located city sites.

In relation to the guiding principles set out in section 5.3, some change to the wording is recommended. Suggested text in the box below would replace the existing ;

### **5.3 Guiding Principles for the Growth of the Dublin Metropolitan Area**

*To achieve the Vision, the MASP identifies 9 Guiding Principles for the sustainable development of the Dublin Metropolitan Area.*

#### **1 Dublin as a global gateway**

*In recognition of the international role of Dublin, to improve access to Dublin Airport, particularly by public transport, and to facilitate the continued growth of Dublin Port and related access improvements.*

#### **2 Compact sustainable growth with accelerated housing delivery**

*To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target of at least 50% of all new homes within or contiguous to the built up area in Dublin, and at least 30% in other settlements. To support a steady supply of sites to accelerate housing supply and to achieve higher densities in urban built up areas, supported by improved services and public transport.*

**3 Integrated transport and land use**

*To focus growth along existing and proposed high quality public transport corridors and nodes on the expanding public transport network, inclusive of proposals under the 'Bus Connects' programme, both DART and Luas extension programmes, and Metro Link proposals.*

**4 Increased employment density in the right places.**

*To plan for increased provision of employment at sustainable locations in the metropolitan area, along quality public transport corridors, and at appropriate locations such as sites near 3<sup>rd</sup> level institutes or near existing employment hubs.*

**5 Alignment of growth with enabling infrastructure**

*To promote quality infrastructure provision and capacity improvement, aligned with national level projects and improvements in sustainable energy, waste management and resource efficiency. District heating and water conservation measures also to be promoted. Such infrastructure to occur in tandem with new development, addressing any capacity issues.*

**6 Social regeneration**

*To realise opportunities for social as well as physical regeneration, particularly in those areas of the metropolitan area which have been identified as having high relative deprivation.*

**7 Identify future development areas**

*To identify future growth areas that may be delivered beyond the lifetime of the draft RSES, yet within the longer-term 2040 horizon set out by the NPF.*

**8 Metropolitan scale amenities**

*To enhance provision of regional parks and strategic Green Infrastructure to form a strategic level amenity network. Elements of this to include greenways/blueways along the canals, rivers and coast as part of the implementation of the National Transport Authority's Cycle Network Plan for the Greater Dublin Area.*

**9 Co-ordination and Active Land Management**

*To enhance co-ordination across Local Authorities and relevant agencies to promote more active urban development and land management policies that help develop underutilised, brownfield, vacant, and public lands.*

Section 5.4, p68; The first grey text box may benefit from a title, e.g. 'strategic development/transport corridors;'. For context, the box could perhaps also be repositioned within the text.

The MASP graphic on P69, fig 5.2, would benefit from a colour-coded key to help identify each of the areas/routes numbered 1-5 (i.e. similar for page 15 of the exec summary document). The illustration of some additional towns may also assist the reader if the image is to be retained as a simplified map.

#### Integrated Land Use and Transportation; Section 5.6

RSES/MASP must ensure that there is timely delivery of public transport infrastructure in tandem with development as it is difficult to plan for high density developments along planned routes without clarity that the infrastructure will be in place by occupation of the development.

Clarity is also required regarding the timing of delivery of the Luas extensions, and DART Underground (a crucial piece of infrastructure). A strong inter-agency approach is required to ensure that infrastructure is prioritised and delivered in tandem with development. In this regard, it is recommended that the RSES include objectives and promote proactive mechanisms to ensure that this approach is adopted.

#### Walking & Cycling

Walking is a fast growing mode of transport in Dublin City. The 2017 Canal Cordons counts show a mode share of 12% for people walking across the canals. This compares with 6% cycling and 29% driving. A strong policy focus on walking should be included in the RSES requiring local authorities to acknowledge the movement hierarchy and to proactively plan for pedestrians. Policy should require local authorities to safeguard pedestrian space and plan for coherent pedestrian networks.

Cycle Parking - Dublin City Council recommends that cycle parking be designed as part of an integrated set of end of trip facilities including shower, changing, drying rooms and lockers etc. Segregated access for cyclists should also be considered at design stage.

#### Shared Mobility

The RSES makes brief mention of bike share schemes. However, shared mobility can play a strategic role and should be acknowledged. It is recommended that the RSES acknowledge the role of shared mobility and smart technology in bringing about modal shift. It is also recommended that the RSES include policies requiring local authorities to proactively consider and facilitate such innovative transport options in their jurisdictions.

### Car Parking

With regard to car parking, it is noted that maximum car parking standards are recommended across the region. Dublin City Council recommends that maximum standards also be accessibility based whereby car parking is more restricted in the most accessible areas. Car parking policy, coupled with strong mobility management and the requirement for high quality cycle parking and associated facilities, has been instrumental in delivering modal shift. Capping of car parking numbers across entire areas at a strategic level may be a difficult, yet strong maximum and accessibility based car parking standards embedded within an integrated mobility strategy should in effect create maximum parking thresholds

### Integrated Mobility Strategies:

Dublin City Council requires the preparation of integrated mobility strategies for large developments. It is recommended that a similar approach be included in the guiding principles for the integration of land use and transportation.

### Green Infrastructure and Amenities;Section 5.9

The definition of Green Infrastructure should be clearly given. The report (section 5.9) puts emphasis on the metropolitan area – a term not used in ecological concepts. It would be more useful to refer to EC guidance on this in relation to differentiation of urban and landscape scales of GI (EEA Technical report No 18/2011). This is an important distinction as it can affect how physical structures are assessed and counted as GI, such as agricultural lands (EEA Technical report No 18/2011) – which are included in the RSES as GI assets, but which should not be counted in a regional landscape context, according to the EC.

There is a tendency in the RSES to count physical features as natural assets. This causes an overstating of the quantum of GI and natural areas. For example, regional parks, agricultural lands and amenity sites have a more limited range of habitats generally than found in nature and should not be classed as natural features.

Figure 5.5 could be enlarged – ie map of 'Dublin Metropolitan GI Network', as the scale is too small to read. Existing GI will require greater protection measures, as GI may be impaired due to intensification/urbanisation

RPO 5.7: The purpose of the greenbelt is not explained. The effectiveness of green belts in other EU cities has been questioned, and the concept is being replaced or augmented by GI (Scott et al 2016).

RPO 5.8: GI and greenway concepts differ and need greater clarity.

### The Smart City (Section 6.6 with some cross reference to section 10.3)

Dublin City Council supports the points raised in the draft text and the recognition of potential opportunities represented by smart city projects i.e. as digital technology becomes embedded across all city functions.

In some cases smart city developments may also represent potential disruption to existing processes and the early recognition of these challenges may facilitate mitigating actions i.e. the move toward low emission and electric vehicles will require robust Smart Grids. In this case robust Smart Grids (i.e. a power network that has sufficient capacity, communications and intelligence to, inter alia, facilitate electric vehicle charging in a responsive and equalised manner). Regional Policy Objective (RPO) 10.14 supports this realisation and support for smart grids are a key component in the EU energy strategy.

While smarter energy grids are an obvious outcome of smart city projects, it is important to identify other potential smart city developments in our economy, environment, mobility patterns and ways of living. To this end, RPO 6.24 supports existing smart city initiatives such as Smart Dublin (charged by the four Dublin Local Authorities to engage with smart technology providers, researchers and citizens to solve challenges and improve city life) and the All Ireland Smart Cities Forum. RPO 6.24 is progressive in supporting the development of smart city programmes in Athlone, Dundalk and Drogheda. These initiatives will be vital in uncovering smart city solutions and developing their potential positive impacts while addressing any challenges to the Eastern and Midlands Region.

### Natural and Cultural Tourism Assets (Section 6.5)

Dublin Bay UNESCO Biosphere has partnered with Failte and is developing a strategy for tourism of Dublin Bay with sustainability targets.

## **Environment (Chapter 7)**

### **Integrated Catchment Management (Section 7.3)**

The transition zone of Dublin Bay UNESCO Biosphere is specifically based on protecting water quality of the wetlands of Dublin Bay and is based on the Water Framework Directive mapping of waterbodies which directly contribute to the Bay. Efforts to improve sustainable urban drainage should be prioritised within the Biosphere transition zone.

### **Biodiversity and Natural Heritage; section 7.5**

It would be useful in the section on Status of Designated Sites to discuss the specific threats to the sites within the EMRA region. Although climate change is potentially linked to the spread of certain invasive alien species (IAS), they are a threat to global biodiversity in their own right. Key challenges should be described specifically for this region. DCC would suggest that the heading 'Non-designated

Sites' be changed as both the National Park and the UNESCO Biosphere have designated Natura 2000 sites within them and the title could be seen as misleading. There are also sites such as National Special Amenity Areas in Dublin, which are designated in part due to their benefits for nature conservation (P&D Act 2000, Part XIII, S. 202). The designation of the Phoenix Park should also be included.

#### *Dublin Bay UNESCO Biosphere*

It would be useful to also consider the Biosphere in section 7.2 Integrated Land and Marine Planning. The Biosphere designation was planned in part to implement objectives for Integrated Coastal Zone Management in the Regional Planning Guidelines (see North Bull Island UNESCO Biosphere Periodic Review Report, Dublin City Council 2014).

#### *Green and Blue Infrastructure section 7.6*

The term 'strategic assets' (7.6) is not defined. Table 7.1 provides a list of 'Strategic Natural, Cultural and Heritage Assets in the Region' but this may confuse the terminology by grouping them together. For example, 'maritime towns and beaches' would bracket towns of varying size and heritage importance with important ecological zones and protected nature conservation sites. Rivers, lakes and canals have very different roles in a GI strategy and different levels of cultural heritage.

Objectives may be required to address GI deficits. EU data shows a projected decline of GI for the Dublin FUA ongoing to 2050 and a decline in recent years (Kompil et al 2015). The MOLAND study indicated loss of green spaces.

#### *Development of Greenways, Blueways and Peatways*

The term 'flagship greenways' needs to be defined. Greenways for Dublin Mountains should be developed in conjunction with groups such as the Dublin Mountains Partnership. Blueways should be planned with primary consideration of biodiversity issues in sites with protected species. The section on Blueways is primarily focused on navigation and water sports without reference to water quality, fisheries and ecological habitats.

#### *Landscapes (7.7)*

The preamble of this section (7.7) should include references to all kinds of landscapes, especially urban landscapes as they are a dominant landscape character type in the region. This approach would be more in keeping with the European Landscape Convention (ELC) which states: "[ELC] concerns landscapes that might be considered outstanding as well as every day or degraded landscapes" (Article 2, ELC). There is an over-emphasis in the RSES on the scenic quality of landscapes.

DCC welcomes the references to aspects of the National Landscape Strategy. There should be a commitment by EMRA to ensure its completion for the region covered by the RSES in this vision document.



## *Soils*

Soils are a key aspect across several environmental factors in the Environmental Impact Assessment Directive (EC 2014): 'The environment' in this context refers to the environmental factors listed in Article 3 of the Directive, and soils are important to a number of these. Greater consideration of soils is required in the RSES beyond the aspects briefly mentioned (types of activities which cause pressures, soil sealing and soil for stormwater retention).

### Climate Change; Section 7.8

It should be noted that the Climate Action Regional Office (CARO) is preparing a submission jointly with the Eastern and Midlands CARO. This will set out recommendations for some amendments including changes/additions to Regional Policy Objectives.

In relation to the role of trees, it is noted that there is currently no legal protection for felling of trees in urban areas in Ireland. DCC suggests that text be included to acknowledge the significant contribution which tree protection and planting in the region can make to climate change adaptation strategies.

RPO 7.20: This should state that it will be done in cooperation with the Dublin Bay UNESCO Biosphere Partnership, as mentioned in the previous section of the RSES.

RPO 7.23: The capacity of a greenway should have regard to what is ecologically sustainable.

RPO 7.24: It is worth noting that the definition of Greenways in the cited national Strategy for the Future Development of National and Regional Greenways (Dept. of Transport and Tourism 2018) is: "a Greenway is a recreational or pedestrian corridor for non-motorised journeys, developed in an integrated manner which enhances both the environment and quality of life of the surrounding area." It is not an ecological corridor by this definition. The standards for performance of a greenway according to the national strategy are not that they provide improvement to ecosystems but rather narrower: "routes should meet satisfactory standards of width, gradient and surface condition"

RPO 7.25: A regional landscape character assessment should be completed.

## **Connectivity; Chapter 8**

### Framework for the Integration of Transport Planning with Spatial Planning Policies; Section 8.3

In relation to mobility management and travel planning, 'soft measures can bring about sustainable travel patterns. There is an emphasis in the RSES on the role of infrastructure in delivering sustainable development and travel patterns, yet it is possible to encourage more sustainable travel through more effective use of existing infrastructure. This approach requires direct engagement with businesses, communities and schools etc. both to identify and address barriers to sustainable travel.

Proactive mobility management has been as important a measure as car parking policy in bringing about modal shift in Dublin City, yet there is currently no funding mechanism for behavioural change initiatives or programmes. Such projects require little capital investment, and can quickly bring about

positive environmental social and economic change. It is recommended that the RSES include a policy emphasis on bringing about behavioural change through proactive mobility management and travel planning. It is also recommended that the RSES identify a funding source for behavioural change programmes.

### **Quality of Life; Chapter 9**

Section (9.1) should include specific references to the proven links between GI supply and health outcomes in Ireland and elsewhere, particularly EMRA's joint research (Foley et al 2018).

Section 9.3; Housing. In relation to the requirement for Local Authorities and the region to carry out Housing Needs Demand Assessments (HNDAs), text on p 162 refers to forthcoming statutory guidelines on Development Plans in relation to housing provision and the gathering of housing data. This would be beneficial given that current guidance on the content of any HNDA is very limited and comprehensive guidance is needed. Any clarity on when these statutory guidelines will be available would assist.

Section 9.4; Public Realm & Placemaking. It is recommended that more explicit policy guidance be provided in the RSES regarding public realm. This could be appropriately combined with a stronger policy focus on walking as recommended above.

Section 9.5; It may be useful to update the document to reflect recently announced URDF funding for relevant projects in section 9.5./12.3.

### **Infrastructure (Chapter 10)**

Recently announced funding for energy projects including district heating could be referred to, e.g. in section 10.3. and or section 12.3

### **Implementation and Monitoring (Chapter 12 )**

Section 12.4 could be updated to reflect the fact that the Planning Regulator has now been appointed and the office established.

### **Appendices (Chapter 13 )**

Appendix B ; population tables; It may be beneficial ( for clarity) to cross-reference the tables to relevant text in the main document, or provide explanatory text such as already in the 3<sup>rd</sup> para of p 42 (S 4.3) ; clarifying the inclusion of headroom and scope for a further 25% (where relevant).

I trust that the matters raised in this submission are taken into account in finalising the RSES. Please do not hesitate to contact me if you wish to discuss further any of the comments raised.

Yours sincerely,

  
John O'Hara  
Dublin City Planning Officer