



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

12th April 2019

**Ref: Proposed Material Amendments to the Draft Regional Spatial & Economic Strategy
2019-2031 for the Eastern and Midland Region**

A Chara,

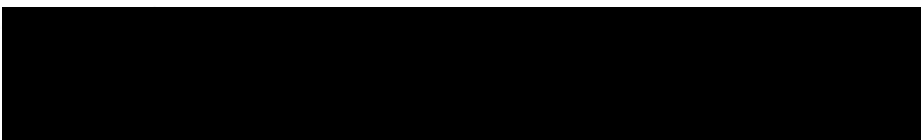
As stated in our previous submissions Fingal County Council in support of the shared vision of the draft Regional Spatial & Economic Strategy (RSES) and, the Metropolitan Area Strategic Plan (MASP) within it, would like to take this opportunity to recognise the significant collaborative efforts undertaken by the Eastern and Midland Regional Assembly (EMRA) to facilitate its coproduction.

We also acknowledge EMRA's consideration and inclusion of the recommendations of our previous submission on the draft RSES and welcome this last opportunity 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 regional approach.

For the purposes of transparency this submission firstly relates to the overall Material Amendment document and secondly to individual numbered Amendments.

Material Amendment document:

As acknowledged in the Draft RSES, its purpose is to take the high-level framework and principles of the National Planning Framework (NPF) and to support the implementation of Project Ireland 2040 and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Region.



The RSES is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. It seeks, at strategic level, to provide a framework for investment to better manage spatial planning and economic development throughout the Region.

To this end, it is considered the main thrust of the Material Amendments has moved from this regional level into the local level. It is considered the inclusion of the proposed further growth enablers, additional Regional Policy Objectives and Guiding Principles change the document from one which sets out an overarching macro-level policy to one which deals with micro-level and local issues. We would consider these policies would be better placed within Development Plans and Local Area Plans.

Fingal very deliberately took the approach that this is a strategic region-wide document. However, if the agreed approach is to include further local level policies, we request that Fingal specific ones are included and these are appended to this submission.

Specific Material Amendments:

26 – 30 Amend RPOs – Swords

Include narrative for Swords to read as follows:

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.*

68 Amend Guiding Principles

7 Identify Future Development Areas – To identify future development area that may be delivered beyond the lifetime of the draft RSES, but within the longer-term 2040 horizon set out by the NPF. – **Reinstate reference to Dunsink and Swords Lissenhall**

69 Amend Rail Projects (also relates to 113)

~~• In principle there is a need to carry out an evaluation of underground metro routes within the M50 (delete)~~

70 Amend Road Projects (also relates to 114)

Include Dublin Airport Western Access

Note: Recommendation from NDP and South Fingal Fringe (January 2019) and ties into new RPO 8.16.

72 Amend Table 5.1 Phasing/Enabling Infrastructure for MASP

Dublin 15 lands**; Short term: Improved Bus & cycle connections to Dublin Enterprise Zone (new text)

Swords-Lissenhall;** Medium to Long Term; Improved bus connections & Metrolink, roads improvements and expanded internal road network (retain text from existing draft RSES)

**Dublin Enterprise Zone and Lissenhall (delete – Note: Lissenhall will be within 1km of MetroLink & this text is contrary to MetroLink Corridor policy) are not directly served by

existing or planned rail and will require improve bus connections and demand management measures.

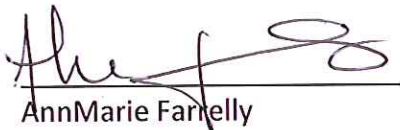
119 New Guiding principles for Healthy Placemaking

Include additional placemaking principles to include urban design element and link to importance of economic growth, integration of good urban design, public realm, amenities and heritage to create attractive communities to live, work, visit and invest in.

Conclusion:

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 – Fingal Related Text

Note:

Additions to the text are shown in green print, for example.

Deletions to the text are shown in red print with strikethrough.

Section 3.2 Growth Enablers

(text taken from Director's Report <https://emra.ie/dubh/wp-content/uploads/2019/03/2nd-Directors-Report-on-draft-RSES-FINAL.pdf>)

Core Region (Amended)

The Core Region includes the peri-urban 'hinterlands' in the commuter catchment ~~around~~ in County Dublin and covers the Mid-East counties of Louth, Meath, Kildare and Wicklow, extending down the East Coast and into parts of the Midlands. The Mid-East has seen the highest growth and highest internal migration of our population and includes some of the youngest and fastest growing towns in the state. The Core Region enjoys access to a high-quality environment, rich heritage and key tourism assets and attractions such as the coastline, the Royal and Grand Canals, the Boyne and Barrow Blueways, Tayto Park, UNESCO site at Bru na Boinne, Malahide Castle and Wicklow Mountains National Park.

Section 4.7 Other Towns

(text taken from Director's Report, as before)

Nevertheless, it should also be noted that such towns are important employment and service centres. In addition some of these settlements, such as Ashbourne, Balbriggán and Ratoath have the potential to strengthen their employment base and develop as important centres of employment due to their strategic location, connectivity with surrounding settlements, and the availability of a skilled workforce. This potential has already been recognised in Balbriggán with its inclusion in the first round of funding from the Urban Regeneration and Development Fund. This funding will harness the town's economic and physical advantages, a significant part of which is the celebration of water, the town's river corridor, coastal, architectural and harbour features. Active land management, targeted property acquisition and partnership, will ensure economic opportunity and investment will follow.

Section 4.8 Rural Areas

65. Amend RPO 4.52 – Rural areas

Local Authorities shall identify and provide policies to support and protect existing rural economies such as valuable agricultural lands to ensure sustainable food supply, and to protect the value and character of the open countryside and to support the diversification of rural economies to create additional jobs and maximise opportunities in emerging sectors, such as agri-food, agri-business, energy, tourism, forestry enterprise.

67. New RPO - Rural Areas

Support the rural economy and initiatives in relation to diversification, agri-food, agri business, rural tourism and renewable energy so as to sustain the employment opportunities in rural areas.

Section 6.4 Economic Engines

Material Amendment 81 proposes new RPO in relation to Regional Enterprise Strategies with specific reference to the midlands and Mid-East areas.

A corresponding RPO is required to reference the Dublin Regional Enterprise Plan (Feb 2019) or the Dublin Regional Strategy (Jan 2017):

New RPO for Tourism

Material Amendment 82 proposes new RPO in relation to Ireland's Ancient East and Hidden Heartlands tourist strategies.

A corresponding RPO is required to reference 'Dublin – a breath of fresh air' Strategy.

Amend narrative to include the additional text on rural areas
(text taken from Director's Report, as before)

Additional text to include:

Specifically in relation to the rural economy Fingal County Council, through the Local Enterprise Office Fingal, is delivering a wide range of financial and non-financial supports to agri-food companies in the County. The Agri-Food Strategy (November 2018) for Fingal builds upon this work and sets out a common framework that will foster innovation and collaboration across the sectors, increasing value added, leading to further jobs creation in the agri-food sector and maximizing the potential of the agri-food base in the County.

86. New RPO – Tourism

Corresponding RPO to read:

Support the local strategies which are already in place to link the towns and villages along the eastern coast, including the Fingal Coastal Way, the East Coast Greenway and the S2S (Sutton to Sandycove) project.

Drivers for Growth – Skills and Innovation

Text amendment accordingly under skills and talent

(text taken from Director's Report, as before)

Include additional as below:

Fingal County Council has recently launched the Fingal Skills Strategy which identifies gaps between the skills of Fingal's workforce and the skills that employers need. Fingal has undertaken an innovative research project, firstly forecasting the skills demand over the next seven years, and subsequently developing a strategy to meet it. Fingal recognises that the availability of skilled workers, particularly in high value adding sectors, is key to maintaining competitiveness and attracting investment into the Region. At the other end of

the spectrum, despite low unemployment rates, there are concentrations of people across the Region who are significantly disengaged from the labour market. The Strategy sets out specific actions such as developing new training courses, increasing course provision, and building relationships and links with employers, educational institutions and other stakeholders. Fingal sees the strategy as a roadmap for future skills development and a model of best practice. Fingal is the fastest-growing Local Authority area in the country, and so the creation of sustainable jobs is a key focus.

97. Amend Table 7.1 Strategic Natural, Cultural and Heritage Assets to include additional assets under the following headings;

- Maritime towns and beaches - Howth
- Lakes, Rivers and Canals – Broadmeadow, Ward, Delvin
- Greenways / Blueways: Fingal Coastal Way
- National and Regional parks; Malahide Castle, Swords Regional Park, Bremore Regional Park, Santry Demesne, St. Catherine's Park, Tolka Valley River Park

