



## Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

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### **Emerging Preferred Scenario for lands at Naas Road/Ballymount/Park West – the ‘City Edge’ Project**

The Eastern and Midland Regional Assembly notes the non-statutory consultation on the ‘Emerging Preferred Scenario’ for the Naas Road / Ballymount / Park West Framework Plan which crosses the administrative boundaries of Dublin City Council (DCC) and South Dublin County Council (SDCC) and sets out hereunder the submission and observations, which were prepared by the executive on behalf of the Assembly and approved by the Cathaoirleach of the Assembly on October 5<sup>th</sup>, 2021.

#### **Regional Spatial and Economic Strategy (RSES)**

The Council will be aware of the finalisation of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region which was made on 28<sup>th</sup> June 2019. The RSES, prepared in accordance with Project Ireland 2040 - the National Planning Framework (NPF), sets the context for each local authority within our Region to develop their county and city development plans in a manner that will ensure national, regional and local plans align. The RSES identifies regional assets, opportunities and pressures and provides appropriate policy responses in the form of Regional Policy Objectives. Embedded within the RSES, is the first statutory Dublin Metropolitan Area Strategic Plan (MASP), which sets out a vision and spatial Framework to better manage the sustainable growth of the Dublin Metropolitan Area. At a strategic level the RSES provides a framework for investment to better manage spatial planning and economic development throughout the Region.

#### **Context**

The Regional Assembly is not required under Section 27 of the Act, to prepare a submission and observations on non-statutory plans of a local authority as is the case for development plans, or variations thereof. However, the Assembly considers that regionally important and strategic plans should be commented upon. In this regard, it is noted that the subject lands are identified in Table 5.1 of the Dublin Metropolitan Area Strategic Plan (MASP) as a strategic long-term landbank for Dublin City with the potential to deliver on the NPF and RSES strategic outcome of Compact Growth and to drive the sustainable growth of the Dublin Metropolitan Area. Given the scale and transformational potential of the City Edge Project, it is considered to be of strategic importance.

#### **Submission**

The Assembly would like to acknowledge the extensive preparatory work and engagement that the two Local Authorities – South Dublin County Council (SDCC) and Dublin City Council (DCC) - have undertaken in collaboration with the project team in preparing an Emerging Preferred Scenario for

these 700 hectares of lands at Naas Road/Ballymount/Park West on the western edge of Dublin City, referred to as the City Edge project.

The consultation documents present key findings from an analysis of the City Edge lands, drawing on best international practice and setting out an emerging vision and objectives for this strategic landbank which has the stated potential to become one of Europe's largest regeneration opportunities, and to shape the future development of Dublin over the next 50 years.

The project aims to create a new mixed-use and climate resilient high density urban Quarter as a western extension of Dublin city, providing for housing delivery at scale as well as significant employment and investment in community facilities, open spaces, and public transport services to meet the needs of existing and future residents, employees, and businesses in the City Edge lands.

Key challenges and opportunities are set out under the following land use themes; housing; economy and employment; natural infrastructure; movement; energy and utilities; and sustainability, which are considered to provide a robust framework to inform the next stage of plan making.

## 1.0 Emerging Preferred Scenario

Informed by baseline analysis and scenario testing, the Emerging Preferred Scenario sets out a strategic brief for a mixed-use Quarter that can evolve over time, providing for up to 75,000 – 85,000 people and 65,000 – 75,000 jobs. A number of key character areas are identified around the strategic transport network, providing for a major new urban centre, a number of local centres and residential-led mixed use neighbourhoods, and clusters of urban industry to attract inward investment.

The Assembly acknowledges that the Emerging Preferred Scenario is a first step in an ongoing process which will develop a shared vision and objectives in collaboration with key stakeholders including existing businesses, landowners, employees, and residential communities. This consultation will inform the development of the project before it progresses to a more detailed Strategic Framework based on a preferred scenario, concluding Stage 1 of the project. Stage 2 - Plan Making will commence in early 2022 with the preparation of a statutory plan followed by Stage 3 – Implementation where key projects will be brought forward for planning, design, and construction.

The Assembly considers that the next stages of plan making could be further strengthened by reference to the spatial planning context of Project Ireland 2040 – National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES) and Dublin Metropolitan Area Strategic Plan (MASP), and the relevant National and Regional Strategic Outcomes and Policy Objectives, which establish the policy framework for local authority land use plans. It is noted that the project has received funding commitments under the Project Ireland 2040 - Urban Regeneration and Development Fund (URDF) for Stage 1 and 2 and it is recommended that any future plan for the City Edge lands ensure good policy alignment with RSES and MASP to enable efficient drawdown of future funding opportunities and delivery of key projects.

## 2.0 Housing and Regeneration

It is stated that the City Edge lands can provide for housing at scale with a potential capacity up to 40,000 new homes and 75,000- 80,000 people, thus supporting delivery of the NPF objective of one million extra homes by 2040 and compact urban development to support the 10-minute city concept.

The consultation documents set out the existing context and challenges that need to be overcome such as divided and multiple land ownership. There is also significant ongoing planning activity with existing planning permissions for approximately 4,000 dwellings in and around the subject lands. The

new Framework plan will need to ensure the creation of new residential-led mixed use neighbourhoods that successfully integrate with the well-established residential communities in the surrounding areas of Walkinstown, Drimnagh, Tempogue, Clondalkin and Ballyfermot and to address significant issues with housing delivery and affordability.

The Assembly welcomes the undertaking of demographic analysis of the Study Area in order to develop the 'Liveable City' concept. The Assembly suggests this could be strengthened by further consideration of the changing demographic trends, including an increasingly diverse and rapidly ageing population, which will require a policy response over the long lifetime of this project. This will include access to healthcare, services, and a range of appropriate residential choice, also recognising that many factors that contribute to a good quality of life for older people are community based, and the need to design accessible buildings and public spaces.

The Assembly also welcome the stated focus on cultural heritage with the Grand Canal, the Camac River and Drimnagh Castle identified as important amenity features that contribute to the unique character of the area. The preparation of the Framework opens an opportunity to promote heritage led regeneration and reuse of buildings to enhance the vitality of urban centres and provide for a diverse mix of daytime and night-time uses. The provision of social as well as physical regeneration including education and life-long learning will support social inclusion and integration of existing and new communities, in line with Guiding Principles for the Dublin Metropolitan Area in the MASP.

The Assembly recognises that the development of these strategic lands will be achieved across a number of development plan cycles consistent with the medium to long term sequential phasing for these lands as set out in Table 5.1 of the MASP. In this regard, the Assembly recommends that a phased and tiered approach be embedded in future stages of plan making, incorporating monitoring and active land management measures to support site assembly and drive delivery, and demonstrating general consistency with national and regional population targets in the Implementation Road Map for the NPF issued under DHPLG Circular FPS04/2018, and any relevant Section 28 Guidelines of the Government.

### **3.0 Integration of Land Use and Transport**

The Assembly welcome the stated intention to significantly improve active and public transport infrastructure to create liveable neighbourhoods, which is supported by RSES policies to promote a 10-minute city where people have easy access to local services by walking, cycling or public transport.

The City Edge lands are located in proximity to the City Centre and well served by the Luas, the Kildare Railway Line and bus services as well as regional and national roads including the Naas Road, however the analysis shows that much of this is at capacity at peak times. Emerging proposals include a Western Orbital Public Transport route, a Kylemore Rail exchange, new Naas Road Luas stop and new crossings across the Naas Road. Also proposed are greenways from Tymon to Phoenix Park and along the Grand Canal, which is welcomed, and the provision of new walking and cycling infrastructure, which will also open opportunities to enhance the public realm, increase permeability and accessibility for all.

The RSES and MASP support the phased delivery of high quality public transport infrastructure, existing and planned, to enable the sequential development of these lands, including Busconnects, DART+ and Luas expansion programmes, and the NTA Metropolitan Cycle Network. The emerging transport interventions in the Framework should be proofed against the Guiding Principles contained in Chapter 8 of the RSES - Connectivity, which require that land use plans within the Greater Dublin Area (GDA) demonstrate consistency with the NTA's Transport Strategy for the GDA (currently under

review) and with the Guiding Principles for Integration of Land Use and Transport set out in Section 8.3 of the RSES and the Transport Investment Priorities in Section 8.4 of the RSES.

Further to the above, it is noted that the finalisation of the review of the NTA Transport Strategy for the GDA will set out the framework for investment in transport infrastructure in the City Edge lands to 2042 and beyond.

The Assembly recommend early engagement with the transport agencies and also highlight the role of the MASP Implementation Group in providing a forum to ensure the co-ordinated provision of transport and infrastructure in tandem with planned growth in the Dublin Metropolitan Area.

## 4.0 Economy and Employment

The project envisages the creation of a major urban centre supporting c.20,000 jobs, and a new commercial centre, local centres and urban industry area supporting c.65-75,000 jobs. This is underpinned by economic analysis to identify existing and future growth sectors including Logistics & Storage; Fintech; Green Energy and Tech; Construction; Medtech; E-Gaming and Biopharma.

The City Edge lands are already a significant employment centre, with over 1,500 existing businesses employing c.25,000 people. The upcoming Framework plan will need to manage the balance between potential relocation and retention of existing employment and the attraction of new investment, while providing for sustainable quality jobs for both existing and future residents.

The Guiding Principles for Integrated Transport and Landuse in Section 8.3 of the RSES provide guidance in this regard to promote increased employment densities in sustainable locations near high quality public transport nodes, third level institutions and existing employment hubs, and to relocate less intensive employment uses outside the M50 ring and built-up areas, in order to ensure the most efficient use of urban lands and maximise the return on public investment in infrastructure.

In planning for the current and future needs of residents, employers and employees in the City Edge lands, the Framework plan should also consider the Guiding Principles for the location of strategic employment and investment prioritisation set out in Section 6.3 of the RSES including access to; suitable locations (depending on whether an enterprise is people or space intensive); serviced sites (energy, water, transport, communications networks); connectivity (including access to markets); skilled labour force (proximity to third level and lifelong learning) and; local strengths (a diverse sectoral mix, research and technology centres, start-up incubators, emerging clusters or value chains).

## 5.0 Climate and Environmental Infrastructure

The Assembly welcomes the stated focus on principles of the Liveable City that embed climate resilient measures from the outset of the regeneration programme, and the inclusion of targets for the provision of green infrastructure and a zero carbon and zero waste ambition for the project.

The development of compact forms of development on the City Edge lands, where people can live near where they work, will play a key role in reducing transport related carbon emissions and help to achieve our national emissions reductions targets. The baseline analysis sets out further challenges that will need to be addressed in the Framework plan in terms of flood risk management; overhead power lines; traffic congestion; barriers to connectivity; contaminated sites; the need to balance amenity and ecology and for significant investment in parks, amenities, and climate change resilience.

The Assembly welcome the holistic approach to different aspects of sustainability in the Emerging Preferred Scenario and the focus on integrating biodiversity and nature-based solutions into

placemaking, which is consistent with the requirement in the RSES for local authorities to incorporate an eco-systems approach in the preparation of statutory land use plans. Also welcome is the stated intention to develop flagship parks that incorporate sustainable urban drainage (SUDs) to address biodiversity and climate and flooding issues on the Camac River and the development of greenways and ecological corridors between Tymon and Phoenix Park, and a blue way along the Grand Canal.

The Assembly commends the stated approach to develop large scale, coordinated heat and energy networks across new developments, to explore opportunities to capture waste heat, shift to renewables and to host a green anchor project as a catalyst for the area to become a green energy hub, which will support implementation of both Local and National Climate Action Plans.

The Assembly welcomes the integration of environmental assessment processes in tandem with the plan making process, noting the publication of the Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA) reports. It is further noted that the strategic environmental assessment at this stage is a draft screening exercise based on the emerging master plan for the project and that there will be opportunity for further focused environmental assessment to inform decision making as more detail is developed in the plan making process and subsequently at project level.

## Conclusion

In conclusion, the Regional Assembly commend the collaborative approach that has been initiated by South Dublin County Council (SDCC) and Dublin City Council (DCC) to inform the future development of a Strategic Framework and master plan for this strategic transboundary landbank, which has the potential to become a flagship project to drive the sustainable growth of the Dublin Metropolitan Area.

The Regional Assembly welcome further opportunities to engage in the next stages of plan making and it should be noted that the officials of the Assembly are available to discuss any of the matters raised above.

Regards,



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Jim Conway  
Director  
Eastern and Midland Regional Assembly  
5<sup>th</sup> October 2021