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Dublin City Development Plan 2022-2028 – Public Consultation Issues Paper

The Eastern and Midland Regional Assembly (EMRA) notes the publication of the Strategic Issues Paper to inform the preparation of the new Dublin City Development Plan 2022-2028 and sets out hereunder observations on behalf of the Assembly. This submission has been reviewed by the executive and approved by the members of the Eastern and Midland Regional Assembly at the meeting of 12th February 2021.

Regional Spatial and Economic Strategy (RSES) 2019-2030

The Council will be aware of the adoption of the Regional Spatial and Economic Strategy for the Eastern and Midland Region which was made on 28th June 2019. In line with the provisions of the Planning and Development Act 2000, as amended, the Planning Authority shall ensure, when making the County Development Plan, that it is consistent with the Regional Spatial and Economic Strategy for the Eastern and Midland Region, thus ensuring full alignment between local, regional and national planning policy. In this regard, the Assembly welcomes the publication of the Issues Paper in preparation of the new Dublin City Development Plan.

Legislative Context

As required by Section 11(2) of the Planning and Development Act 2000, as amended, the Regional Assembly received notice from the Council on December 15th 2020, of its intention to review its existing City Development Plan and to prepare a new Development Plan for its area. Under Section 27A of the Planning & Development Act, 2000 (as inserted by Section 17 of the Planning and Development Act, 2010) the Eastern and Midland Regional Assembly, is obliged to prepare submissions / observations to be submitted to the relevant Planning Authority and copied to the Office of the Planning Regulator

The submission of the Regional Assembly shall include, but shall not be limited to, recommendations regarding a number of matters including, policies or objectives of the Government in relation to national and regional population targets and the best distribution of residential development and related employment development with a view to promoting consistency with the RSES and assisting in

drafting the Core Strategy; promoting regional development through maximising the potential of the Region; planning for the best use of land having regard to location, scale and density of new development to benefit from investment of public funds in transport infrastructure and public transport services; and collaboration between the Planning Authority and the Regional Assembly in respect of integrated planning for transport and land use, and the promotion of sustainable transportation strategies in urban and rural areas, including the promotion of measures to reduce anthropogenic greenhouse gas emissions and address the necessity of adaptation to climate change.

Accordingly, this report contains the opinion of the Eastern and Midland Regional Assembly in relation to the above matters along with any recommendations as required under Section 27A of the Planning and Development Act. Under Section 11 (4) of the Act, a Chief Executives Report prepared by the Planning Authority shall summarise the issues raised and recommendations made by the Regional Assembly and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the draft City Development Plan.

Submission

The Regional Assembly welcomes the explicit recognition in the Strategic Issues Paper, of the policy context and hierarchy with which the Dublin City Development Plan (CDP) 2022-2028 is required to be consistent with, including reference to the Regional Spatial and Economic Strategy (RSES) and Project Ireland 2040 - National Planning Framework (NPF) and other policies and Guidelines of the Government including the NTA Transport Strategy for the Greater Dublin Area (GDA) and the 2019 Climate Action Plan. The Assembly also welcomes the recognition given to the Metropolitan Area Strategic Plan (MASP), which is a key policy driver for the sustainable growth of the Dublin Metropolitan Area (DMA).

The Assembly recognises the efforts made by the Council in encouraging public participation in the preparation of the development plan during ongoing periods of COVID public health restrictions and welcome the use of online channels to facilitate engagement, including a series of public information webinars and facilitating public submissions via an online consultation portal and in writing. This submission highlights key areas for consideration to promote consistency with the RSES and assist in drafting the Core Strategy, also setting out an individual response to the themes highlighted in the Dublin City Strategic Issues Paper.

1.0 Ensuring Consistency with the RSES – Key Areas

Notwithstanding the requirement of the Planning Authority to ensure that the City Development Plan (CDP) 2022-2028 is consistent in its entirety with the RSES the following are key areas that the Regional Assembly wish to draw attention to in the drafting of the Core Strategy of the CDP:

1.1 Vision and Strategic Outcomes

In determining the overall vision of the new Dublin CDP, the Council should consider the Vision, Key Principles and Regional Strategic Outcomes (RSOs) of the RSES Chapter 2. The RSOs are aligned to the

National Strategic Outcomes (NSOs) of the NPF and it should be noted that the ability to demonstrate delivery of these may potentially be linked to future funding sources.

1.2 Growth Strategy of the RSES

In preparing the draft CDP, it should be noted that Growth Enablers are specified in Section 3.2 of the RSES to facilitate sustainable growth across the Region. Growth Enablers are underpinned by the spatial mapping of Functional Urban Areas (FUAs) within the Region. The attention of the Council is brought to the general Growth Enablers for the Eastern and Midland Region, Growth Enablers for Dublin City and Metropolitan Area and Growth Enablers for the Dublin – Belfast Economic Corridor.

1.3 Sustainable compact growth

The delivery of compact growth through the development of underutilised, brownfield and infill sites that are close to existing services and infrastructure, plays a key role in achieving sustainable development, in line with National Strategic Outcome (NSO 1) of the National Planning Framework (NPF) and Regional Strategic Outcome (RSO 2) of the RSES.

The Council's attention is brought to RPO 3.2 (Chapter 3 – Growth Strategy) of the RSES which requires local authorities, in their Core Strategies to set out measures to achieve compact growth targets of at least 50% of all new homes within or contiguous to the built-up area of 'Dublin City and Suburbs' as defined by the Central Statistics Office (CSO), and RPO 3.7 which states that local authorities shall have regard to environmental and sustainability considerations for meeting their sustainable development targets and climate action commitments.

To support achievement of compact growth targets, Section 3.2 of the RSES sets out Guiding Principles for infill and brownfield development, which includes the creation of a brownfield database at the local level and the inclusion of focused active land management measures in the CDP. RPO 3.3 also determines that regeneration lands are identified in Core Strategies and that specific objectives are set out including consideration of targeted zoning objectives and active land management measures to drive the regeneration of these lands. It is anticipated that further guidance on the delivery and monitoring of compact growth will be addressed in upcoming Department of Housing, Local Government and Heritage (DHLGH) draft Ministerial Guidelines for Development Plans.

1.4 Settlement Strategy of the RSES

In developing the settlement hierarchy for the city as part of the Core Strategy of the upcoming DP, the Council shall ensure consistency with the settlement strategy set out in Table 4.2 of the RSES (Chapter 4 – People and Place), in defining key locations for strategic residential and employment development to support the achievement of sustainable compact growth. The RSES used an asset-based approach to define a settlement hierarchy for the Region, with a focus on consolidation of 'Dublin city and suburbs', at the top tier in the Settlement Hierarchy, supported by the designation of a network of regional growth centres and key towns across the Region.

The Dublin Metropolitan Area Strategic Plan (Chapter 5 – MASP) sets out a vision and spatial framework for Dublin city and suburbs to grow to a population of 1.4 million people and for a population of 1.65 million in the wider Dublin Metropolitan Area (DMA), by 2031.

Section 5.3 sets out Guiding Principles for consolidated growth and accelerated housing delivery in a number of strategic development areas (SDAs), which are identified in Table 5.1 of the MASP, and linked to the phased delivery of key enabling transport, infrastructure, amenities, and services (RPOs 5.4 and 5.5 refer) to ensure a steady supply of strategic development lands in the metropolitan area. The population capacity set out in Table 5.1 demonstrates the capacity of SDAs to meet and exceed NPF population targets for Dublin City and the MASP. The Core Strategy of the upcoming CDP should have a focus on the delivery of identified SDAs in the MASP whilst retaining flexibility to provide for ongoing opportunities for increased densities, reduced vacancy and re-use of underutilised lands.

Of relevance to Dublin city are the identified SDAs in the ‘City Centre within the M50’, which promote the ongoing regeneration of Dublin Docklands and Poolbeg, and the wider North Easter Inner City). This is coupled with the re-intensification and redevelopment of underutilised infill and brownfield lands throughout the city and suburbs, including Naas Road /Ballymount (in collaboration with South Dublin County Council) and the regeneration of older social housing and industrial estates. Also highlighted are regeneration opportunities and synergies in proximity to Higher Education Institutes and large employers, including Diageo lands, St James Hospital and Grangegorman campus.

1.5 National and Regional Population Targets

In preparing the draft CDP, the council must provide for an adequate supply of land and housing to meet projected population growth for the city council. RPOs 4.1 and 4.2 of the RSES require core strategies to be determined by local authorities in accordance with the population projections set out in the RSES and NPF, and that infrastructure investment be accordingly aligned with the spatial strategy to meet projected growth. Population targets are to be applied in line with Appendix B of the RSES (SPA and County Population Targets) and the requirements of the transitional population projections methodology in the Implementation Roadmap for the NPF, issued under DHPLG Circular FPS04/2018 and a robust evidence-based analysis of demand, past delivery and potential.

Further to this, there is an allowance under National Policy Objective (NPO) 68 of the NPF for up to 20% of the phased population growth targeted in Dublin city and suburbs, to be accommodated in the wider metropolitan area. The transitional populations projections for the Dublin MASP were approved by the elected members of the Regional Assembly on July 10th, 2020 and set out the following range of population projections for Dublin City Council; to 2026: 613,000 (low) – 625,000 (high) and 2031: 638,500 (low) – 655,000 (high).

The publication by the Department of Housing, Local Government and Heritage (DHLGH) in December 2020, of Section 28 Planning Guidelines on Housing Supply Target Methodology for Development Plans and accompanying ESRI Regional Demographics and Structural Housing Demand research, in addition

to the transitional population projections methodology in the Implementation Roadmap, will assist the Council in appropriately integrating the national and regional population projections into their housing strategy, informed by the Housing Need and Demand Assessment (HNDA) process, and assist in drafting the Core Strategy as part of the statutory development plan process. It is anticipated that upcoming DHLGH draft Ministerial Guidelines for Development Plans, will further address the preparation of evidence-based core strategies.

2. Issues Paper

The Strategic Issues Paper identifies the following strategic areas, which the next City Development Plan 2022-2028 must address; Shaping the City, Climate Action, Quality Housing and Sustainable Neighbourhoods, the City Economy, Sustainable Movement and Transport, The City, Urban Villages and Retail, Green Infrastructure, Open Space, Recreation and Natural Heritage, Built Heritage and Archaeology, Culture and Sustainable Environmental Infrastructure and Flood Risk, and required Strategic Environmental Assessments, which are considered to provide a robust basis for scoping and developing the CDP.

This submission has detailed each of these sections in turn and consideration should be given to the observations and recommendations set out below in order to ensure consistency with the RSES:

2.1 Shaping the City

The stated focus of the upcoming Plan will be to develop a vibrant city core complemented by an integrated network of well serviced neighbourhoods, building on the spatial hierarchy in the core strategy to ensure the continued consolidation of the City and maximise investment in key public transport projects. The Assembly welcomes the recognition given in the Strategic Issues Paper to the need for compact urban form, providing for increased height and density in tandem with a renewed focus on good urban design and placemaking to create attractive places to live and invest in.

The RSES and the MASP set out Regional Policy Objectives (RPOs) to promote increased densities and ensure the most efficient use of urban land. RPOs 5.4 and 5.5 require local authorities to provide for higher residential densities and qualitative standards, in line with Ministerial Guidelines on 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for New Apartments' and 'Urban Development and the Building Heights Guidelines for Planning Authorities' published in 2018 by DHPLG, which require planning authorities, in their statutory land use plans to identify areas for increased height and density, particularly in urban centres with high quality public transport, and the need to promote an effective mix of uses and more active land management.

In this regard it should be noted that Table 5.1 of the MASP identifies a number of strategic development areas (SDAs) with the capacity to achieve higher densities and accelerated housing supply supported by improved services and public transport, linked to the delivery of Bus Connects, DART and LUAS expansion programmes, Metrolink and GDA Cycle Network, while maintaining the capacity and

safety of strategic transport networks. See also, the observations under Section 1.3 in relation to compact sustainable growth, regeneration of underutilised lands and active land management.

2.2 Climate Action

The focus in the Issues papers on Climate is welcomed, in keeping with the RSES Key Principle on Climate Action, supported by RSOs 6-11. Also welcomed is the Council's adoption of the 'Dublin City Climate Change Action Plan' 2019-2024, and the role of the Dublin Climate Action Regional Office (CARO) in supporting Dublin city achieve a transition to a low carbon society and economy low carbon.

It is recognised that the CDP will play a key role in the delivery of compact growth and sustainable development to reduce the Council's carbon footprint and address mitigation and adaptation requirements. Information contained at Chapters 4, 7, 8 and 10 of the RSES will also assist the Local Authority in developing an integrated climate policy, in particular Section 7.9 Climate Change and the related RPOs address the need for decarbonisation of the transport, built environment and energy sectors.

The review of the CDP offers an opportunity for further integration of policies to support mode shift to sustainable mobility, transition to electric and low emissions vehicles including local authority fleet, and for the promotion of energy efficient buildings, district heating and renewable energy sources in planning for future growth.

The Council's attention is also drawn to accelerated climate action measures set out in the Climate Action and Low Carbon Development (Amendment) Bill, which commits Ireland to interim reductions in GHG emissions towards net-zero emissions by 2050. The new Plan will be required to include measures to assess and monitor progress on carbon reduction targets, in line with RPO 3.6 of the RSES. To this end, it should be noted that EMRA is leading an ESPON EU research programme (QGasSP) to identify a robust method for quantifying the relative GHG impacts of alternative spatial planning policies, the outputs of which may inform the review of the Plan.

2.3 Quality Housing and Sustainable Neighbourhoods

The Assembly welcomes the recognition given in the Issues Paper to the principles of Healthy Placemaking, social inclusion, housing choice and the creation of sustainable communities whereby a range of services and amenities are accessible by walking, cycling or high-quality public transport within the '10 minute settlement'. The Issues Paper also recognises challenges raised by the COVID pandemic, including a need for flexibility in the design of homes and a renewed focus on local amenities.

The Guiding Principles for Healthy Placemaking in Section 9.4 and RPOs 9.10 to 9.17 (Chapter 9 – Quality of Life) and Guiding Principles for Land Use and Transport (Section 8.3 Chapter 8 – Connectivity) in the RSES will support the Council in planning for the provision of recreation and open space facilities and ensuring development prioritises the need for people to be physically active in their daily lives. With regard to social integration, RPO 9.2 promotes active participation and integration of minority groups

in planning for diverse needs, and RPOs 9.18 and 9.19 support the role of the Local Economic and Community Plans (LECPs) and Local Community Development Committees (LCDCs) in planning for the provision of social infrastructure.

The Council's attention is brought to Section 9.3 Housing and Regeneration and RPOs 9.3 - 9.9, which support local authorities, approved housing bodies and other sectoral agencies, including the new Land Development Agency in delivering a greater mix of housing type and tenure, including social and affordable housing and new models of cost rental and affordable homeownership, particularly on public owned lands. In preparing the draft Plan, the council will be required to undertake an assessment of the availability and capacity of future residential and regeneration development lands within the City and to ensure a plan led approach in co-ordinating and developing strategic landbanks to enable regeneration.

Consideration will also need to be given to the phasing and prioritisation of development lands, and that all future land subject to zoning shall undergo an infrastructure and deliverability assessment in line with NPF NPOs 72 (a), (b) and (c) and Appendix 3 of the NPF which sets out a tiered approach to land zoning. Also, of relevance are RSES RPO 4.2 to promote collaboration with infrastructure providers to ensure alignment of enabling infrastructure investment. The comments in Section 1 'Ensuring Consistency with the RSES – Key Areas' will provide further guidance, in particular the need to deliver compact growth, to identify regeneration lands and accelerate housing delivery on strategic development areas in the MASP in tandem with key public transport and services, existing and planned.

A key challenge will also be to ensure the provision of zoned and serviced lands translates into an adequate supply of housing to meet the needs of current and future populations having regard to trends in household size, tenure and demographics. To this end, it is recommended that the review of the Plan be accompanied and informed by an evidence-based Housing Needs Demand Assessment (HNDA) which will allow for detailed consideration of housing mix and the monitoring of housing supply, in the preparation of a Housing Strategy and in the Core Strategy of the new Plan. The Regional Assembly will support local authorities, either individually or combined, in preparing a HNDA (RPO 9.5 refers) and considers the four Dublin Authorities should apply a consistent methodology in this regard.

The publication by the DHLGH in December 2020, of Section 28 Planning Guidelines on Housing Supply Target Methodology for Development Plans, will support the preparation of a HNDA in setting out a consistent methodology for the application of NPF population targets into demand for housing over the development plan period. As part of the development plan process, the Council will be required to demonstrate their core strategy is consistent with the NPF Roadmap population projections and the Housing Supply Target Guidelines and to ensure there is adequate provision for the delivery of housing to meet this demand, having regard to the availability of services, development land and pattern of housing completion. It is acknowledged that further DHLGH Guidelines on HDNA and, as previously stated, for Development Plans are currently being progressed.

2.4 The City Economy

The Assembly welcomes the inclusion of a section on Economic Development as part of the Issues Paper. Economic Opportunity is one of the three key principles of the RSES which is linked to Place-making and the promotion of strategic locations for new economic development and for investment, as part of an orderly growth strategy that is consistent with the Settlement Hierarchy in the RSES. Dublin city is characterised as an international business core with a strong diversified economic base and access to international markets, and a high quality retail, culture and service hub. The Council's attention is drawn to Chapter 6 of the RSES, which deals specifically with Economy and Employment.

RPO 6.3 promotes the Dublin-Belfast Corridor as a key economic driver and Section 6.5, details specific sectors, such as Retail, Tourism, Marine, Low Carbon Economy and Agriculture which should be consulted in developing related plan policy. The Climate Strategy of the RSES also sets out policies to develop the low carbon and circular economy (RPO 6.23 refers) and accelerate a shift to renewable energy and secondary heat sources. The role of natural and cultural assets in developing enhanced tourism and leisure experiences is supported in RPOs 6.15 – 6.18 and RPO 6.8.

The RSES also recognises the importance of skills and innovation (RPOs 6.25 - 6.27), research and technology (6.29) and co-working / digital hubs (RPO 6.31) and supports the further development of smart city initiatives (RPO 6.30), and promotion of Dublin as a test bed for future connected networks. With regard to co – working the three Regional Assemblies jointly published a Regional Co-working Analysis of the private sector in Ireland and also mapped all existing co-working facilities, this publication can be found on the Assembly website <https://emra.ie>.

The identification of locations for strategic employment development as part of the development plan process, should be informed by an evidence-based assessment of the location, quantum, density and capacity of existing and any future proposed employment zoned lands, in order to meet current and future employment needs. Guiding Principles for the location of strategic employment and investment prioritisation (Section 6.3) include access to; suitable locations (depending on the extent to which an enterprise is people or space intensive); serviced sites (energy, water, transport or communications networks); connectivity (including access to international markets via an airport/port); skilled labour force (proximity to third level and lifelong learning) and; local strengths (a diverse sectoral mix, research, innovation and technology centres, start-up incubators, emerging clusters or value chains).

Guiding Principles for the MASP (Section 5.3 refers) support increased employment densities within the City at appropriate locations near high quality transport nodes and services, third level institutions and existing employment hubs, and to relocate less intensive employment uses outside the M50 ring (RPO 5.6 refers). Table 5.2 identifies locations for increased employment densities on older industrial lands in the City, the Docklands, Poolbeg and North East Inner City, and clusters related to health and higher education at Diageo lands, St James Hospital and Grangegorman TU Dublin campus.

The challenge of sustaining and creating local employment in tandem with large scale regeneration is recognised. To support inclusive growth, particularly in deprived or underperforming areas the RSES sets out policies that seek to improve skills, diversify local economies and promote SMEs and indigenous enterprise. RPOs 6.31 and 6.32 recognise the key role played by enterprise agencies, Regional Skills Fora, LCDCs and Local Enterprise Offices (LEOs) in stimulating a pipeline to sustain inclusive growth including support for start-ups, SMEs and social enterprises. The Dublin City Local and Economic Community Plan (LECP) will require review in light of the adoption of the RSES, and the Council should seek to ensure consistency between the LECP, the development plan and the RSES.

2.5 The City, Urban Villages and Retail

The Issues Paper identifies eight Key District Centres and five designated District Centres outside of the City Centre, which is the top tier of urban centres in the City. Also highlighted is the need for revitalisation of some of the older suburban centres and the need for new retail centres such as Clongriffin / Belmayne, 'The Point' District Centre, Poolbeg and Naas Road to be supported in their functions by the development of appropriate densities and mix of uses.

The Council's attention is drawn to the retail hierarchy for the Region as presented in Table 6.1 of the RSES, which designates Dublin city and suburbs as the top tier in the RSES Settlement Hierarchy, supported by twelve District Centres. While the need for the preparation of a new retail strategy for the Region is recognised in the RSES (RPO 6.10 refers), it should be noted that RPO 6.11 of the RSES requires that future provision of significant retail development shall be consistent with the Retail Planning Guidelines for Planning Authorities 2012, or any subsequent update, and the retail hierarchy for the Region, expressed in the RSES, until such time as this hierarchy is updated.

Also of relevance, is Section 8.3 - Integration of Transport and Landuse in the RSES, which sets out Guiding Principles for the location of trip intensive developments such as large-scale retailing in accessible locations well served by public transport.

The Issues paper recognises the changing nature of retail and the challenges facing urban centres and traditional on-street retailing, which has been accelerated by the COVID pandemic. In terms of town centre renewal the Council is directed to RPOs 6.12-6.14 which support the reuse of vacant spaces, shopfront improvements and placemaking initiatives to develop new and enhanced experiences in our commercial centres, which have been severely impacted by COVID-19 particularly in retail, tourism, arts, culture and leisure sectors, with increased vacancy and a sharp decline in footfall in the city centre.

The Eastern and Midland Regional Assembly carried out analysis to identify which urban centres within our region are most exposed to economic disruption caused by COVID-19, to inform targeted measures and supports for sectors which have been particularly exposed to COVID including tourism, retail and services this publication can be found on the Assembly website <https://emra.ie>. The analysis found that relative exposure is likely to be lower in urbanised areas that have a more diversified economic base,

however Dublin county – in absolute terms – had the highest number of commercial units in sectors, which are most likely to be severely impacted.

The new Plan will need to address both the short and anticipated long term impacts of a shift towards home-working, and potential decrease in tourism and commuting trips, as well as opportunities to facilitate co-working and remote-working spaces and provide for a wider mix of daytime and night time uses in commercial centres. The Assembly also supports the continued roll out of accelerated measures to improve accessibility and permeability in the public realm and support walking and cycling in response to ongoing COVID impacts.

2.6 Sustainable Movement and Transport

The Regional Assembly welcomes the Council's commitment to integrated transport and land use and to sustainable mobility, outlined in the Issues Paper and recognises the progress that has been made with regard to modal shift and improved public transport in the City, which will be further supported by the planned delivery of key public transport projects, including BusConnects, DART and LUAS expansion programmes, and Metrolink, and delivery of the NTA Cycle Network for the GDA.

The RSES seeks to ensure the effective integration of transport planning with spatial planning policies, from regional to local transport plans and associated transport investment priorities. Information contained in Chapter 8 - Connectivity and Chapter 10 - Infrastructure will assist the Planning Authority in developing related policy. Of note are the Guiding Principles set out in Section 8.3, RPO 8.16, which supports the improvement and protection of the strategic TEN-T and national road network and RPO 8.4, which requires that land use plans within the GDA demonstrate consistency with the NTA's Transport Strategy for the Greater Dublin Area (GDA), which is currently under review.

The Assembly recognises that the sustainable growth of the City requires the provision of planned transport infrastructure to support future development. These include planned bus and rail projects set out in Tables 8.2 and 8.3 in the RSES and Section 5.6 in the MASP. The Assembly welcomes that planning and design work is continuing on key public transport projects, despite COVID-19 and notes that public consultation is underway on the LUAS to Finglas and DART+ West.

The prioritisation of DART + West and City Centre Enhancements from Connolly and Spencer Dock in the first phase of the DART + programme and the second phase electrification of the Kildare line from Dublin Heuston, will open new stations, improve interchange with other networks and open the potential of strategic development lands, including Naas Road. The delivery of Metrolink and planned extension of the LUAS Greenline to Finglas will also open the potential for reintensification of older industrial and brownfield lands along this route and throughout the City. The delivery of 200 km of cycling arteries in tandem with Busconnects core bus corridors will significantly improve sustainable travel choices in the City.

The RSES supports key targets set out in the Government's Smarter Travel Policy to achieve a reduction in car-based commuting, as expressed in RPOs 5.2, 5.3, 8.7, 8.8 and 8.9, which require that future development be planned and designed in such a manner that facilitates sustainable modes of transport, with a particular focus on walking and cycling and the delivery of the Greater Dublin Area Cycle Network (Fig 5.3). The Assembly recommends early engagement with the transport agencies to ensure the integration of transport and land use in the upcoming CDP to help achieve this mode shift.

Also welcomed is the progress that has been made in improving walking and cycling infrastructure as part of the accelerated measures in response to the COVID-19 pandemic. The Assembly supports the continued roll out of public realm and active travel interventions, which should include provision for older people, people with disabilities and young children in line with the principles of universal design (RPOs 9.12 and 9.13 refer) and incorporate monitoring measures to inform the implementation of permanent solutions where clear benefits are identified.

2.7 Green Infrastructure, Open Space, Recreation and Natural Heritage

The Assembly welcomes the recognition given in the Issues paper to the role of Green Infrastructure (GI) and Ecosystem Services in supporting biodiversity and enhanced quality of life, in line with RPOs 7.21 and 7.22 of the RSES which recommend that local authorities promote a GI and eco-system services approach in development plan preparation. The Council is directed in this regard to the Guiding Principles for Green Infrastructure (Section 7.7 refers) and for Sustainable Urban Drainage (Section 10.2 refers) and Guiding Principles for Healthy Placemaking and the provision of recreation and open space facilities (Section 9.4 refers).

Also welcomed is the progress in delivering greenways including Phase 2 of the Royal Canal Greenway. There are significant opportunities to further develop a Strategic Greenway Network (RPOs 5.7, 5.8, 7.24 and 7.25 refer) including the Royal and Grand Canals and Canal Loop Greenway, and the Liffey and Dodder Greenways, which are recognised as strategic Green Infrastructure in Fig 5.5 of the MASP and Table 7.1 of the RSES. The design of greenways will need to be subject to careful routing and design to ensure the protection of environmentally sensitive sites.

The Assembly also supports the development of improved visitor experiences, nature conservation and sustainable development activities within the Dublin Bay UNESCO Biosphere as set out in the RPO 7.20 of the RSES.

As a partner on the Interreg Europe PROGRESS project, EMRA has engaged with key stakeholders to facilitate the integration of ecosystem services into policy and plan making and share best practices such as the National Ecosystem and Ecosystem Services Mapping Pilot (NEES) and support the delivery of strategic Green Infrastructure in the Dublin Metropolitan Area. The outputs of the project as it progresses, may inform the integration of Green Infrastructure and Ecosystem Services Mapping into the upcoming CDP, in line RPO 7.21.

2.8 Built Heritage and Archaeology

The Issues paper highlights the wealth of built heritage in Dublin, which comprises both architectural and archaeological heritage that will require effective management and protection, while ensuring the continued development of the City.

The RSES emphasises that good heritage management should be incorporated into spatial planning to promote the benefits of heritage led urban regeneration in historic towns, for example through the protection of historic urban fabric, the reuse of historic buildings and the enhancement of places of special cultural or natural interest. Section 9.7 of the RSES and its related RPOs 9.24 to 9.30 highlight the role of built heritage in creating a sense of place and enabling regeneration of urban areas.

It is also recognised that Dublin's heritage and archaeology, in particular its Viking legacy, the medieval city core, and the Georgian and Victorian terraces, plays a key role in driving tourism and economic development in terms of placemaking and enhancing the vibrancy and regeneration of historic town centres. Section 9.7 of the RSES and its related RPOs 9.24 to 9.30 provide guidance which should assist in developing plan policy in this area. The Assembly welcomes the stated intention in the Issues Paper, that the Heritage Plan will be prepared in tandem with the City Development Plan and the policies and objectives of the CDP will complement and reinforce those in the Heritage Plan.

2.9 Culture

The Issues Paper highlights the wealth of cultural resources in our capital city, from major cultural institutions and globally recognised festivals to local community spaces and events that engage with a wide range of communities and play an important role in addressing social exclusion.

The impact of Covid-19 on the arts and culture sector has been severe, with negative impacts to the economy and vibrancy of the City Centre. The review of the City Development Plan provides an opportunity to consider policies to support existing cultural spaces and places and provide for new opportunities to engage with culture.

Section 9.7 of the RSES and its related RPOs 9.24 to 9.30 provide guidance in developing plan policy in this area, emphasising the role of arts and culture in providing a distinctiveness of place, and in defining Ireland international profile. Culture, language and heritage are integral to the life and identity of the City, also providing significant economic benefits in terms of creative industries, in particular the audio visual sector and cultural tourism, which is a central plank of the Irish Tourism industry.

2.10 Sustainable Environmental Infrastructure and Flood Risk

The Regional Assembly welcomes the Council's commitment to the provision of high-quality infrastructure and utilities in a plan led manner to ensure that there is adequate capacity to support future development. Information contained in Chapter 5 – MASP and Chapter 10 - Infrastructure will assist the Planning Authority in developing related policy in particular Tables 10.1 and 10.2 which set out strategic water/wastewater infrastructure projects.

The Water Supply Project for the Eastern and Midland Region, and the upgrade of the Ringsend wastewater treatment plant will be critical to ensure long term security of water supply in the Region. The Assembly recommends early engagement with the relevant agencies, including Irish Water to ensure that water and air quality, noise and waste management accord with relevant EU and national legislation.

As detail is developed in the preparation of the CDP, further focused environmental assessment will be required, including Strategic Flood Risk Assessment (SFRA) as set out in RPO 7.12 of the RSES. RPO 7.15 states that Local Authorities shall take opportunities to enhance biodiversity and amenities and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned. Furthermore riparian setbacks should be achieved where appropriate, as set out in RPO 7.26. It is recommended that the Council take into account the need to identify risks and ensure the resilience of critical infrastructure, as set out in RPO 7.43 of the RSES. The planning authority shall also note the provisions of the National Mitigation Plan 2017 and the National Adaptation Framework 2018 in this regard.

The Issues paper also makes reference to the need for high quality ICT and energy networks. The Council's attention is drawn in this regard to Sections 8.6 which deals with communications and digital infrastructure (RPOs 8.25 and 8.26 refer) including support for the Smart Dublin initiative, RPO 6.30 refers.

The Assembly also welcomes the recognition in the Issues Paper to energy planning and the potential for district heating zones, which would function as Strategic Energy Zones suitable for larger waste energy generating projects. The Council is directed to Section 10.3 'Energy' and the Guiding Principles to support the provision of EV charging infrastructure, roll out of smart grids and reinforcement of the Greater Dublin Area's transmission network (RPOs 10.19 to 10.24 refer) enabling the promotion of renewable energy sources, as part of Eirgrid's Development Strategy.

2.11 Environmental Assessment/SEA/AA

The assembly acknowledge and welcome the statement as part of the Issues Paper that the CDP will be carried out in tandem with the required environmental processes, namely Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment. As detail is developed in the preparation of the Plan, there will be further opportunity for the integration of sustainable development targets and climate action obligations, including assessment of greenhouse gas emissions in accordance with RPOs 3.6 and 3.7 of the RSES. See also the Assemblies observations in relation to Climate Action set out in Section 2.2 of this Submission.

The Assembly recommend early engagement with the relevant bodies in this regard, including the Office of Public Works, Department of Housing, Local Government and Heritage, including the National Parks and Wildlife Service, the Environmental Protection Agency and Irish Water.

3.0 Conclusion

The Regional Assembly welcomes the publication of the Strategic Issues Consultation Papers which marks the beginning of the alignment of planning policy at the county and local levels with Regional and National Policy. The Assembly look forward to corresponding with the Council on the forthcoming stages of the City Development Plan process

It should also be noted that the officials of the Regional Assembly are available to discuss the matters raised above and will be available throughout the County Development Plan process

Regards,



Jim Conway, Director
Eastern and Midland Regional Assembly
February 12th 2020.