



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

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Dún Laoghaire-Rathdown

Draft County Development Plan 2022 – 2028

The Eastern and Midland Regional Assembly (EMRA) notes the publication of the Draft Dún Laoghaire-Rathdown County Development Plan (CDP) 2022-2028 and sets out hereunder submissions and observations on behalf of the Assembly. This submission has been reviewed by the executive and approved by the members of the Assembly at the plenary meeting of 12th March 2021.

Regional Spatial and Economic Strategy (RSES) 2019-2030

The Council will be aware of the finalisation of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region, made on 28th June 2019, which initiated the statutory period within which the Council are required to prepare their draft development plan, as stated at Section 11(1) (b) of the Planning and Development Act 2000, as amended (the Act). In this regard, The Assembly welcomes the publication of the Draft Dún Laoghaire-Rathdown County Development Plan which enables the coordinated and timely incorporation of Project Ireland 2040 - the National Planning Framework (NPF) and the RSES, thus ensuring full alignment between local, regional, and national planning policy.

Legislative Context

As required by Section 27B of the Act, The Eastern and Midland Regional Assembly has prepared this submission and sent a copy of same to the Minister and Office of the Planning Regulator.

In accordance with the Act, a submission shall contain a report which shall state whether, in the opinion of the Regional Assembly, the draft development plan, and in particular its core strategy is consistent with the Regional Spatial and Economic Strategy. If, in the opinion of the Regional Assembly the draft development plan, and its core strategy are not consistent with the RSES, the submission / observations and report shall include recommendations as to what amendments, in the opinion of the Regional Assembly, are required to ensure that they are consistent. This report contains the opinion of the Eastern and Midland Regional Assembly in relation to the above matters along with recommendations as required under Section 27B of the Act.

The attention of the Council is also directed to the requirements of Section 12 (4) of the Act, whereby a Chief Executive's Report prepared by the Planning Authority shall summarise the issues and recommendations raised by the Eastern and Midland 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 development plan.

Submission

The Assembly would like to acknowledge the extensive work that the Local Authority has carried out in preparing the draft County Development Plan (CDP) and that this work follows a period of considerable change, within a planning policy context, that included the publication of the National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES) and the establishment of the Office of the Planning Regulator (OPR). Accordingly, the Assembly welcomes the overall approach and effort of Dún Laoghaire-Rathdown (DLR) County Council to coordinate and incorporate policies and objectives, so that they are consistent with the RSES and NPF.

The Assembly considers that the overall Draft Dún Laoghaire-Rathdown County Development Plan, including its Core Strategy, are consistent with the RSES subject to the observations and recommendations of this submission, which broadly follows the chapter headings of the draft CDP and which are considered to provide a robust framework for the development of an overall strategy for the proper planning and sustainable development of the County.

This report sets out in detail the Assembly's observations and recommendations in relation to the policies and objectives in Chapters 1-2 which set out the Vision and Core Strategy of the draft CDP, in particular to ensure consistency between the Core Strategy and the RSES.

Further observations and recommendations are set out under Chapters 3 – 11 in relation to a range of Policy Objectives which the Council will seek to deliver upon over the six-year life of the CDP and include: Climate Action; Sustainable Neighbourhoods; Sustainable Mobility and Transport; Enterprise and Employment; Towns, Villages and Retail; Green Infrastructure and Biodiversity; Open Space, Parks and Recreation; Environmental Infrastructure and Flood Risk; and Heritage.

The observations of the Assembly in relation to Chapters 12- 15; Development Management; Land Use Zoning; Specific Local Objectives; and Implementation Monitoring and Evaluation are set out under the heading 'Other' and the submission concludes with Chapter 16: SEA/AA

1.0 Introduction, Vision and Context

The Assembly welcomes the inclusion of the introductory chapter of the draft county development plan (CDP), which sets out the statutory framework and planning hierarchy through which the draft CDP is prepared with reference to relevant policy parameters in the NPF, RSES, the Dublin Metropolitan Area Strategic Plan (MASP), and other relevant legislation, government policies and Section 28 Guidelines.

The Chapter also sets out the overall Vision for the County, which is underpinned by 5 Strategic County Outcomes that seek to create a climate resilient, compact and connected, inclusive and healthy, and economically vibrant county, with a network of livable towns and villages. It is stated that these have been drafted having regard to the National Strategic Outcomes set out in the NPF, the Regional Strategic Outcomes set out in the RSES, and the UN Sustainable Development Goals, and this is welcomed in support of the required alignment between local, regional and national planning policy.

2.0 Core Strategy

This Chapter sets out the Core Strategy, which is the settlement and growth strategy that will guide the development of the County, and which is required to be consistent with NPF and RSES and any Section 28 Guidelines of the Government. In this regard the Assembly welcomes the inclusion in Appendix 14 of a Statement demonstrating how Dún Laoghaire-Rathdown (DLR) County Council has

implemented the relevant policies and objectives of Section 28 Guidelines of the Minister when considering their application to the County in the draft CDP. EMRA is aware of upcoming guidance to issue from the Department of Housing, Local Government and Heritage and acknowledges that the absence of these guidelines at the this time will create challenges for some local authorities.

The Assembly welcome the preparation of an evidence-based analysis of key population and housing trends, including an interim Housing Need Demand Assessment, land availability and infrastructure capacity assessments, and a rationale for the main considerations which have informed the Core Strategy, as part of the development plan process.

The Core Strategy is considered to provide a robust framework in demonstrating consistency to national and regional population targets and in identifying future growth opportunities in co-ordination with transport and infrastructure delivery to achieve compact sustainable development, subject to the observations and recommendations set out below.

2.1 Population projections

To inform the Core Strategy, the draft CDP highlights growth trends whereby DLR has experienced significant population growth, above the national average, over the most recent intercensal period to 2016. The draft CDP anticipates that Census 2022 will confirm ongoing strong population growth based on ongoing high levels of planning and construction activity in the County as evidenced by Dublin Housing Supply Task Force and Central Statistics Office (CSO) dwelling completions data.

The Core Strategy sets out a number of steps in determining population projections for the County in line with national and regional population projections in the NPF Roadmap, issued under DHPLG Circular FPS04/2018 and Appendix B of the RSES (SPA and County Population Tables), as adjusted to comply with National Policy Objective (NPO) 68 Transitional Population Projections for the Dublin MASP, which were agreed by the elected members of the Regional Assembly on July 10th, 2020.

In formulating the Core Strategy, the county population projections in the RSES to 2026 and 2031 are adjusted for additional 25% headroom to 2026 for counties where population growth is projected to be at or above the national average, in line with the transitional population projections methodology in the NPF Implementation Roadmap. The projections are further adjusted to comply with NPO 68, which allows for an additional allocation to DLR to RSES 2031 'High' projections (up to 267,375 of which 3,500 population is to be allocated to the 'Metropolitan Key Town' of Bray), subject to the delivery of compact growth in tandem with existing or planned high-capacity public transport.

Table 2.5 details the Core Strategy population projections as set out above and adjusted to the CDP timelines up to 2028 (up to 258,375 population or 40,375 additional growth) over the census 2016 baseline, which is consistent with the NPF Roadmap and RSES Appendix B (high) and NPO 68.

2.2 Draft Housing Strategy and Interim Housing Needs and Demand Assessment

The draft CDP sets out an evidence-based analysis of housing demand and delivery based on CSO and Dublin Housing Task Force data, showing that new dwelling completions and planning activity have both significantly increased since the financial crash, including high levels of apartment provision, with higher rates of household formation projected to continue, however, housing delivery has not kept pace with growth resulting in 'pent-up' demand in the County. Based on the analysis, an identified challenge will be the provision of additional housing for a greater number of smaller households, while also catering for a mix of house types, in a County where house prices are higher than average.

The Core Strategy has been informed by a 'Draft Housing Strategy and Interim HNDA 2022-2028', which is included in Appendix 2 of the draft CDP and sets out a detailed evidence-based analysis of the drivers of housing demand, supply, and affordability to inform housing policies in the draft CDP along with requirements for specialist provision and for social housing in accordance with Part V of

the Planning and Development Act, and to provide for an appropriate housing mix as per SPPR 1 of 'Sustainable Urban Housing: Design Standards for Apartments' (2018).

The 'Draft Housing Strategy and Interim HNDA' indicate a low incidence of single housing in the countryside and the Core Strategy sets out a Rural Settlement Strategy with further policy objectives in Chapter 4 of the draft CDP which restrict one-off housing in rural and green belt areas and seek to accommodate local growth into identified small villages subject to the availability of services.

The Assembly acknowledge the policy gap in relation to HNDA and Housing Strategy Section 28 Guidelines and considers that the 'Draft Housing Strategy and Interim HNDA' provide a robust evidence-based framework to inform the housing policies in the draft CDP.

The Assembly welcome the inclusion of a policy objective in the draft CDP that states the intention of the Council to review the interim HNDA, upon the delivery of a Regional HNDA in conjunction with the other Dublin Local Authorities, following the adoption of relevant Section 28 Guidelines.

2.3 Residential Development Capacity Assessment

In formulating the Core Strategy, DLR have undertaken a 'Residential Development Capacity Audit' to assess the capacity of existing zoned residential and mixed-use land to accommodate development and to inform the housing target in the Core Strategy. The Audit aligns with National Policy Objective (NPO) 72a of the NPF that requires a standardised, tiered approach to identify zoned land that is serviced (Tier 1) and zoned land that is serviceable (Tier 2) within the life of the CDP. The Audit also identifies potential infill/brownfield sites to support the delivery of compact growth.

The Assembly welcomes the inclusion in Appendix 1 of the draft CDP of a 'Tiered Approach to Land Zoning–Infrastructure Assessment', which sets out a detailed appraisal of strategic enabling infrastructure requirements in the County, with reference to strategic development areas (SDAs) and enabling infrastructure and phasing in Table 5.1 of the MASP, and to the key enabling infrastructure for identified infill/windfall and strategic growth areas of Ballyogan and Environs, Woodbrook-Shanganagh, Kiltiernan-Glenamuck, Old Connaught, Rathmichael and Cherrywood in the draft CDP.

The Residential Development Capacity Audit estimates 553 hectares of zoned land which is or may become available in the lifetime of the CDP, and calculates the potential residential yield having regard to recommended densities in the 'Sustainable Residential Development in Urban Areas' Guidelines for Planning Authorities. Table 2.8 of the draft CDP provides a breakdown by category of infill/windfall sites and strategic growth areas, equating to a potential yield of between 22,763 and 25,353 residential units. Strategic infrastructure requirements for Tier 2 lands is set out in Appendix 1 with further detail on community infrastructure in Chapter 4 'Neighbourhood - People, Homes and Place'.

2.4 Housing Target

Based on projected ongoing strong population growth and informed by an evidence-based analyses of demand, delivery and capacity, the draft CDP recommends that a RSES 'High' population growth scenario be applied in the determination of core strategy targets. Table 2.7 in the draft CDP sets out the housing target for the County, based on an average household size of 2.5, for an additional 20,669 residential units for the CDP period 2020-2028.

The Council's attention is brought to the publication by DHLGH in December 2020, of Section 28 Guidelines on Housing Supply Target (HST) Methodology for Development Plans and accompanying ESRI Regional Demographics and Structural Housing Demand research. In addition to the NPF Implementation Roadmap, which will assist the Council in integrating national and regional population projections into their 'Draft Housing Strategy and Interim Housing Need Demand Assessment', as part

of the development plan process. It is anticipated that upcoming Section 28 Guidelines for Development Plans may also provide guidance in the preparation of evidence-based core strategies.

The draft CDP will be required to demonstrate general consistency with the NPF Roadmap and accordingly with the related ESRI NPF housing demand scenario in the HST Guidelines at Chief Executives Report and, if required, at Material Alterations stages. In this regard, it is recommended that the Housing Target for 2020-2028 in Table 2.7 of the draft CDP be updated to take into account the housing demand for the 6 years of the CDP plan period 2022-2028, and to set out a rationale that demonstrates consistency between the Core Strategy and relevant Section 28 Guidelines.

2.5 Settlement Strategy

The Settlement Hierarchy for the County is presented in Table 2.9 of the draft CDP and reflects the RSES Settlement Hierarchy, designating 'Dublin city and suburbs', which includes the majority of the urban footprint of Dún Laoghaire-Rathdown (DLR) as a city of international scale at the top tier, supported by the development of the 'Key Town' of Bray including Old Connaught lands within DLR at the third tier, and the rural village of Glencullen as Tier 6 at the bottom of the Settlement Hierarchy.

The Settlement Strategy is illustrated by Figure 2.9 Core Strategy Map seeks to deliver compact growth within the existing built footprint of Dublin city and suburbs in tandem with the delivery of enabling transport and infrastructure, identifying the 'Key Town' of Bray, 'Major Centres' of Dundrum and Dún Laoghaire, 'Mixed Use Districts' of Sandyford and Cherrywood, 'District Centres' of Nutgrove, Stillorgan, Blackrock and Cornelscourt and 'New Residential Communities' of Ballyogan and Environs, Woodbrook-Shanganagh, Kiltiernan- Glenamuck, Old Connaught and Rathmichael.

The 'rural' footprint of DLR is concentrated in the south-west of the County and includes Rural Amenity and High Amenity zones in the foothills of the Dublin Mountains, which are under strong urban pressure for housing. The draft CDP seeks to control the spread of urban-generated 'one-off' housing in line with 'Sustainable Rural Housing – Guidelines for Planning Authorities' (2005) and it is not anticipated that rural housing will be of a scale to warrant inclusion in the Core Strategy Table.

It is considered that the Settlement Strategy in the draft CDP is consistent with the RSES Settlement Strategy which seeks to consolidate 'Dublin city and suburbs' and within the existing built-up area, the urban structure is aligned the Retail Hierarchy of 'Major Town Centres' and 'District Centres' set out in Table 6.1 of the RSES. The Settlement Strategy is also aligned with Table 5.1 of the MASP which identifies strategic development areas to be delivered in tandem with enabling transport and infrastructure, including lands at Woodbrook-Shanganagh, Bray - Old Connaught, Cherrywood, Sandyford, Ballyogan and Environs and Kiltiernan-Glenamuck, which are located within DLR.

2.6 Core Strategy Table - Distribution of Zoned Lands and Residential Yield

The Core Strategy Table 2.10 of the draft CDP provides a further breakdown of proposed distribution of zoned lands and residential yield within the existing built-up area providing for an additional 20,669 residential units for the CDP period 2022-2028. The draft CDP states that the housing target can be achieved within the existing residential capacity of zoned land in the County, and there is no additional zoning of land for residential proposed within the draft CDP timeline.

The Core Strategy Table sets out the future development potential, which is categorized by 'infill/windfall' sites and 'strategic growth areas', including the 'New Residential Communities' of Ballyogan and Environs, Woodbrook-Shanganagh, Kiltiernan-Glenamuck, Old Connaught and Rathmichael, and the Cherrywood Strategic Development Zone (SDZ). The Table identifies an excess of between 2,094 and 4,684 units, however it is noted that the full build-out of Cherrywood SDZ may extend beyond the timeframe of the CDP and can be considered to form part of a strategic land bank.

An additional 38 ha lands at Old Connaught are identified as a strategic land reserve for the period 2029-2031 beyond the CPD timeline and will be subject to a future Local Area Plan. These lands are not zoned for residential development; therefore, they are not included in the Core Strategy Table. This is consistent with the phased delivery in Table 5.1 the MASP which identifies lands at Old Connaught to be developed as short (2026) to medium term (2031) in tandem with the delivery of key public transport and infrastructure to support the planned growth of the Key Town of Bray.

The MASP also recognises the need for a long-term planning response to address complexities in achieving compact growth, and states that core strategies of development plans relevant to the MASP should have a focus on the delivery of sites in the MASP while retaining flexibility to respond to new and future opportunities for the delivery of housing in the metropolitan area, in line with the transitional population projections methodology in the NPF Roadmap and a robust evidence based analysis of demand, past delivery and potential.

Having regard to the above, it is considered that the Core Strategy of the draft CDP is consistent with the RSES, is informed by robust evidence-based assessment and makes provision for an adequate supply of zoned land and housing to meet projected population growth in the County, with a focus on brownfield/infill lands to achieve compact growth, in line with strategic objectives of the NPF and RSES, subject to demonstrating general consistency with relevant Section 28 Guidelines.

2.7 Employment lands

The Assembly welcomes the evidence-based approach as part of the Core Strategy which considers both existing land use zoned for employment purposes, and the requirement for additional employment lands based on projected population and employment growth, with reference to guiding principles in the RSES and Table 5.2 of the MASP to identify locations for strategic employment in proximity to existing or planned strategic transport corridors, to reduce unsustainable travel patterns.

The Core Strategy sets out a profile based on 2016 Census data, indicating a comparatively high employment density and sustainable 'Jobs Ratio' of 0.9 for DLR (jobs / labour force). There are c. 250 hectares of employment zoned lands in the County with additional employment clusters spread across a range of zoning categories in 'Major Town Centres' and 'District Centres' and smaller centres across the County. Based on an estimated additional 17, 878 jobs forecast, it is stated that undeveloped employment zoned lands at Cherrywood and Carrickmines, in addition to suitable brownfield lands throughout the County, including Sandyford Business District, can accommodate this level of demand.

Table 2.14 sets out the employment potential of Strategic Employment Locations at Sandyford (key strategic employment location to accord with the Sandyford Urban Framework Plan), Cherrywood (future key strategic employment location and Strategic Development Zone), Carrickmines (identified as the primary location for high intensity office within the Ballyogan & Environs Local Area Plan), UCD and IADT (potential synergies with Higher Education Institutes to drive high-tech and high potential start-ups) and the Major Town Centres (key strategic urban regeneration sites). Further information regarding retail development is set out in Chapter 7 - Towns, Villages and Retail Development.

Having regard to the above, it is considered that the proposed employment strategy in the draft CDP is consistent with the RSES Guiding Principles for the Location of Strategic Employment and is informed by a robust evidence-based analysis of employment lands. Table 2.14 is also aligned with the strategic employment development areas of Sandyford, Cherrywood, Ballyogan (Carrickmines) identified in Table 5.2 of the MASP and will support increased employment densities within the existing built up area in locations that are accessible to high quality public transport corridors, existing and planned, in line with the Guiding Principles for the growth of the Dublin Metropolitan Area.

2.8 Implementation and Delivery

The Assembly welcomes the inclusion in the Core Strategy of a section on implementation, which sets out a programme for Local Area Plans (Table 2.15) and the commitment in the draft CDP to monitor delivery of compact development within the built-up area of Dublin city and suburbs, which comprises the majority of projected housing growth within the lifetime of the CDP. It is anticipated that further guidance on the delivery and monitoring of compact growth will be addressed in upcoming Section 28 Guidelines for Development Plans.

The Assembly also welcomes, the stated intention of the Planning Authority to maintain a spatial database of strategic brownfield and infill sites to be updated and monitored as part of active land management including the Vacant Sites Register, and will incentivise, by way of the vacant site levy, the development of vacant sites through active implementation of the Urban Regeneration and Housing Act 2015 (as amended).

The Core Strategy identifies a number of strategic regeneration sites as part of an asset-based approach including; the former Dundrum Central Mental Hospital; Dundrum Town Centre Phase 2 lands; Dún Laoghaire Harbour Lands; 'Racecourse South' lands in the Ballyogan and Environs LAP; and residential zoned lands in the Sandyford Urban Framework Plan area.

The establishment of a performance management framework to assist the Council in meeting its statutory reporting requirements is welcomed, with further detail set out in a new dedicated Chapter 15 - Implementation, Monitoring and Evaluation'.

3. Climate Action

The Assembly welcomes the inclusion in the draft CDP of a dedicated Chapter to support Climate Action and it is recognised that the delivery of compact growth will play a key role in achieving more sustainable settlement and travel patterns in the County to reduce the need for unnecessary private car journeys – and associated emissions. Table 3.1 of the draft CDP sets out a holistic and integrated approach in demonstrating how each of the Chapters in the CDP contribute to Climate Change Adaptation or Mitigation, and further observations in this regard are set out in the following sections.

Also welcomed is the Council's adoption of the DLR Climate Change Action Plan' 2019-2024, which sets out the baseline climate adaptation and mitigation assessment and target actions for Energy and Buildings, Transport, Flood Resilience, Nature Based Solutions and Resource Management, supported by the Dublin Climate Action Regional Office.

The draft CDP states that Codema are preparing a 'Dublin Region Energy Master Plan' for Dublin Local Authorities to provide an evidence base for emissions monitoring and to inform energy and transport policies. This will support identification of Strategic Energy Zones and district heating opportunities in line with RPOs 7.35 and 7.38 of the RSES. The Assembly also welcome the inclusion of a Landscape Assessment Study and Landscape/Seascape Character Areas in Appendix 9 and a Wind Energy Strategy in Appendix 11 of the draft CDP, which can support delivery of projects within Strategic Energy Zones.

It is noted that the 'Area of Wind Potential' for large scale wind energy infrastructure in the County is limited and concentrated in high amenity areas, but that the Council remains supportive of offshore wind energy development and small-scale wind energy developments within urban areas. The inclusion of Appendix 14 Table 4: Implementation of SPPRs from DHPCLG (2017) Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change is welcomed.

The attention of the Council is brought to the DHLGH Circular Letter LGSM01-2021 of February 2021 and the 2019 Climate Action Plan which requires local authorities to identify at least one Decarbonising Zone, that would be subject to a plan for the integration of a range of measures

including decarbonisation of energy, built environment and transport sectors, to provide carbon storage and meet the climate needs of the area, and which may be used to access NPF Climate Action Funds. The potential to identify decarbonising and low emission zones may be considered as part of strategic urban regeneration/ brownfields and transport orientated development and incorporate measures to support increased permeability and a shift to sustainable modes of transport.

The Assembly welcomes the inclusion of a policy objective in the draft CDP that outlines the Council's commitment to include measures to assess and monitor progress on Greenhouse Gas emissions (GHG) reduction targets, following the development of a robust methodology for quantifying the GHG impacts of spatial planning policies, with reference to the QGasSP ESPON EU research programme, upcoming Section 28 Development Plan Guidelines or other national Guidance. The Council's attention is also drawn to accelerated climate action measures set out in the Climate Action and Low Carbon Development (Amendment) Bill, published in October 2020, which commits Ireland to interim reductions in GHG emissions including an average 7% per annum reduction from 2021 to 2030 towards net-zero emissions by 2050.

The review of the CDP offers an opportunity for further integration of policies to support mode shift to sustainable mobility, and the incorporation of key targets for mode share in the governments Smarter Travel Policy, or any update thereof.

4. Neighbourhood - People, Homes and Place

The Assembly welcomes the inclusion of a dedicated Chapter which sets out detailed policy objectives to support the creation of sustainable communities, delivery of housing choice to meet a range of diverse needs and promotion of healthy placemaking and the '10-minute' settlement concept, where a range of facilities and services are accessible by walking, cycling or high-quality public transport.

Also welcomed is the recognition given in the draft CDP, to the key role of the Council's Local Economic and Community Plan 2016-2021 (LECP) and future LECP 2021-2026, for supporting community development and driving economic development for the County, with reference also to the role of the DLR 'Age Friendly Strategy' 'Healthy County Plan' and Public Participation Network, in planning for social infrastructure needs and creating inclusive communities.

The draft CDP proposes a new land use zoning objective 'SNI' for the provision of sustainable neighbourhood infrastructure, which includes a range of health, education, community and recreation facilities and services. Specific requirements for neighbourhood infrastructure in new residential communities will primarily be incorporated into Local Area Plans and agreed in consultation with relevant government departments and agencies. The Assembly recognises that access to services is central to healthy placemaking and welcomes the inclusion of specific objectives for the provision of social infrastructure, which will also support the '10-minute' neighbourhood concept and ensure quality of life for residents is enhanced through the delivery of consolidated urban growth.

Together with proposed policy objectives to restrict the spread of one-off housing into rural and green belt areas, and to encourage sustainable higher densities with high quality design in proximity to high quality public transport corridors and urban centres, it is considered that the draft CDP will support compact growth and has the potential to reduce the carbon footprint of the County.

Also welcomed is the inclusion of a Building Height Strategy for the County in Appendix 5 of the draft CDP, which sets out area specific guidance and performance-based criteria for building height to support delivery of increased residential densities and compact growth as part of a plan led approach.

This Chapter also sets out policy objectives to encourage a greater diversity of housing and apartment types, sizes and tenures, along with social housing and provision for specific needs including Traveller accommodation, homeless, disabled and older persons housing, in accordance with the provisions of

the 'Draft Housing Strategy and Interim Housing Need Demand Assessment (HNDA)'. In this regard, the Assembly welcome the preparation by DLR, of a HNDA as part of their Housing Strategy during a time when the HNDA guidance at national level is yet to be confirmed. The Assembly considers that the draft CDP is supported by a robust evidence-based methodology to inform housing policies, in accordance with National Policy Objective (NPO) 37 and Regional Policy Objective (RPO) 9.5.

The Assembly welcome the inclusion in Appendix 14 of a detailed statement demonstrating compliance with the policies and objectives of relevant Section 28 Guidelines. Tables 2 and 3 sets out how the draft CDP will support implementation of specific planning policy requirements from DHLGH Sustainable Urban Housing: Design Standards for New Apartments' and 'Urban Development and Building Heights Guidelines' in relation to provision of build to rent and student accommodation in suitable locations and a more varied mix of housing type and tenure throughout the County.

The Council is further directed to the observations and recommendation of the Assembly, which are set out in Section 2.0 Core Strategy and which are relevant to this Chapter.

5. Sustainable Movement and Transport

The Regional Assembly welcome the Council's stated commitment in this Chapter, to integrated transport and land use, promoting sustainable mobility, including walking and cycling and public transport, and integration of demand management and travel planning measures to facilitate sustainable travel patterns and enable modal shift.

Also welcomed is the stated commitment of the Council to the use of Area Based Transport Assessments which integrate national and regional transport policies and objectives into local level land use plans and significant development areas in the preparation of Local Area Plans (LAPs) in the County. The Assembly recommends early and ongoing engagement with the transport agencies to ensure the integration of transport and land use in the draft CDP and any upcoming local land use plans and to incorporate mode shift targets into the planning and design of future development, with reference to the Government's Smarter Travel Policy or any update thereof.

This mode shift to sustainable transport will be facilitated by the delivery of key public transport infrastructure projects including the Luas Green Line Enhancement Project, BusConnects and the Greater Dublin Area Cycle Network. Capacity for growth will also be supported by a new station at Woodbrook-Shanganagh and the westward expansion of Bray to Fassaroe and Old Connaught linked to public transport improvements set out in the 'Bray and Environs Transport Study' (2019) including in the longer term the Luas Green Line Extension to Bray, to be carried out in collaboration between DLR and Wicklow County Councils and the transport agencies, NTA and the TII.

The Council's attention is brought to Section 5.6 Key Transport Infrastructure in the Metropolitan Area and Table 8.2 Rail Projects in the RSES which states the intention to 'Undertake appraisal, planning and design of LUAS network expansion to Bray, Finglas, Lucan and Poolbeg'. In this regard, it is noted that the delineation of the proposed Luas Line Extension on Land Use Zoning Maps 10 and 14 may be premature to the findings of any such appraisal, and subject to the current Review of the NTA Transport Strategy and any Area Based Transport Assessment prepared as part of the future Old Connaught LAP. It is recommended that the proposed LUAS Line Extension should be updated to reflect the proposed LUAS Line Extension to Bray as set out in the RSES and NTA Transport Strategy for the Greater Dublin Area 2016-2035.

The Assembly welcomes the proactive approach and progress that has been made by the Council 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 and incorporate monitoring measures to inform the implementation of permanent solutions where clear benefits are identified.

The Assembly also welcomes the inclusion of a policy objective to improve access to and support the continued development of Dún Laoghaire Port as a marine related asset in accordance with the 'National Ports Policy' and consistent with RPO 8.23 of the RSES.

6. Economic Development and Employment

The Assembly welcomes the inclusion of a Chapter on Economic Development and Employment and the evidence-based approach that the Local Authority have adopted in setting out the socio-economic and employment profile of the County, and to inform economic policies in the draft CDP. The recognition of the need for alignment between the CDP and the Local Economic and Community Plan (LECP) is welcomed, along with the role of the LECP in facilitating local economic development.

The Core Strategy sets out a spatial distribution of employment lands and has concluded that there are sufficient employment zoned lands to meet estimated demand over the lifetime of the CDP and includes a policy objective to retain and protect this employment landbank to ensure that sufficient serviced lands continue to be available for employment generation. The Regional Assembly considers the location of strategic employment lands in the draft CDP is consistent with the Settlement Hierarchy in the RSES and MASP, and the Council is further directed in this regard to the observations and the recommendations of the Assembly set out in the previous Section 2.7 Employment lands.

DLR has a well-educated and highly skilled workforce, and the economic strategy in the draft CDP seeks to develop knowledge based, creative and social enterprise in the County, and work with Further and Higher-Level Institutes, including University College Dublin (UCD) and Dún Laoghaire Institute of Art, Design and Technology to develop education and skills and promote research, innovation and develop sites for high-tech and high potential start-ups. It is a Policy Objective to support the Smart Dublin Initiative and the development of Smart Districts such as Smart Sandyford to test and deploy technology to address challenges and strengthen its attractiveness as a place to do business.

Tourism is acknowledged as a key sector with reference to Fáilte Ireland intentions to develop Visitor Experience Development Plans for the Coast and the Mountains of Dublin, which are key assets in the County, and the Councils attention is also drawn to the designation of Dublin Bay as a UNESCO Biosphere in this regard. The draft CDP also includes policies relating to the equine, maritime, local services, promotion of home working/e-working, rural enterprise and diversification of local enterprise to create resilience, and transition to a low carbon economy, all of which are supportive of the economic policies in the RSES and other government policies.

7. Towns, villages and Retail Development

The draft CDP sets out the retail hierarchy for DLR which is considered to be consistent with the retail hierarchy for the Region as presented in Table 6.1 of the RSES and the Retail Strategy for the Greater Dublin Area. This includes the two 'Major Town Centres' of Dundrum and Dún Laoghaire, the five 'District Centres' of Blackrock, Stillorgan, Nutgrove, Cornelscourt and Cherrywood and smaller 'Neighbourhood Centres' in different locations across the County.

The draft CDP recognises the changing nature of retail and highlights a trend towards a more multifunctional role for towns, villages and other types of centres, with more 'experiential' retail, food and beverage sector, and building on culture and heritage and placemaking to create a sense of place and vibrancy. Table 7.2 provides a summary of the overall strategy for each type of centre in the retail

hierarchy for DLR, in conjunction with specific policies for ‘Major Town Centres’, ‘District Centres’, ‘Neighbourhood Centres’ and ‘Corner/Local Shops and Small Villages’ included in this Chapter.

The Regional Assembly recognises the challenges facing traditional on-street retailing, which have been accelerated by the COVID-19 pandemic and welcome the efforts made by the Council to develop new and enhanced experiences and a sustainable mix of functions within commercial centres. The Assembly supports the continued roll out of measures to improve accessibility and permeability in the public realm, to support walking and cycling in response to ongoing COVID impacts including a shift towards home-working, as well as opportunities to facilitate co-working and remote-working spaces and a greater mix of daytime and night time uses in our urban centres.

The Eastern and Midland Regional Assembly carried out analysis to identify which urban centres are most exposed to economic disruption due to the COVID-19 pandemic, as well as an economic analysis of co-working spaces to inform targeted supports and investment, and these publications can be found on the Assembly website <https://emra.ie>

8. Green Infrastructure and Biodiversity

The Assembly welcomes the inclusion of a dedicated Chapter on Green Infrastructure (GI) and Biodiversity, the inclusion of Appendix 15 Green Infrastructure Strategy and the recognition given to GI as a key strategic asset for the County, and one which can aid in the creation of a climate resilient County. Also welcomed is the integration of an emerging Ecosystem Services Approach which will be included in the new Biodiversity Plan for the County and is also highlighted in the Core Strategy of the draft CDP, which contains a policy objective to promote an Ecosystem Services Approach in the preparation of lower-level plans, strategies and development management.

The draft CDP indicates the intention to update the DLR ‘Green Infrastructure Strategy’ during the lifetime of the Plan, in this regard the attention of the Council is brought to the GI policies in Section 5.9 of the MASP and Table 7.1 Strategic Natural Cultural and GI Assets in the Region. The recognition given in the draft CDP to the Dublin Bay Biosphere and Dublin Mountains Partnership, including the flagship National Way marked trail from Shankill to Tallaght, are welcomed. The RSES further highlights the recreational and tourism potential of natural assets and supports alignment with Fáilte Ireland’s key tourism brands.

This Chapter includes a policy objective to designate ‘decarbonising zones’ under the Government’s Climate Action Plan 2019 during the lifetime of the CDP, in this regard the Council is directed to the recommendations in the previous section 3.0 Climate Action. Other policy supports for Climate Action include the preparation of an Ecological Network Map and Wildlife Corridor Plan, support for the All-Ireland Pollinator Plan, increased use of nature-based solutions and the preparation of Local Seascape Character Assessment under the forthcoming National Marine Planning Framework. The inclusion in the draft CDP of Appendix 9 Landscape Assessment Study and Landscape/Seascape Character Areas, Appendix 10 Ecological Network, will support further policy development in this regard.

The Assembly commends the commitment of DLR to the principles of sustainable development and GI and looks forward to continued engagement with the Council to facilitate the integration of ecosystem services into policy and plan making, to improve GI and Ecosystem Services Mapping and support the delivery of strategic GI, in line with the policy objectives of the RSES and MASP.

9. Open Space, Parks and Recreation

This Chapter sets out a hierarchy of public open spaces shown in Table 9.1 that includes Greenways Network; Regional Parks; District Parks; Local Parks; Amenity Open Spaces; and Civic Spaces and includes a policy objective to review the existing Open Space Strategy and the County Tree Strategy.

The recognition given in the draft CDP to the role of open space and healthy placemaking in facilitating improvements to human wellbeing and the quality of life is welcomed, along with policy objectives to develop a comprehensive network of County Greenways linking parks and public open spaces and to link into wider strategic networks.

The attention of the Council is further brought to the potential to develop a network of strategic greenways highlighted in the RSES including the East Coast Trail, Wicklow Way, Dublin Mountains Way and Dodder Greenway, subject to careful routing and design to ensure the protection of environmentally sensitive sites. Appendix 12 Public Rights of Way/Recreational Access Routes will support additional policy development in this regard and is welcomed.

Also welcomed are policy objectives to support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan and the provision of enhanced open space, sports and recreation, including water based sports and play facilities across the County.

10. Environmental Infrastructure and Flood Risk

This Chapter sets out a range of policy objectives in relation to a range of infrastructure, pollution, flood risk and coastal protection as follows: Water and Wastewater; Waste; Pollution; Telecommunications; Flood Risk and Coastal Protection.

The Chapter also sets out policy supports for climate action including to provide adequate wastewater treatment, manage surface water in a sustainable manner, minimise waste in accordance with the principles of the circular economy and to provide flood protection measures and reduce flood risk as far as possible in the County. It is stated in the draft CDP that the Planning Authority shall have regard to any forthcoming Guidelines on River Basin Management and other Section 28 Guidelines as appropriate. The planning authority shall also note the provisions of the Climate Action Plan 2019, the 'National Mitigation Plan 2017' and the 'National Adaptation Framework 2018' in this regard.

The draft CDP makes reference to the impact of climate change in relation to increased flood risk and coastal erosion, in this regard the attention of the Council is drawn to RPO 7.43 and the need to ensure the resilience of critical infrastructure that is capable of withstanding, adapting and recovering from extreme weather events, for example, coastal rail lines.

The draft CDP includes policy objectives to assist the Office of Public Works (OPW) in the design and construction of flood relief schemes following from the recommendations of the 'Catchment and Flood Risk Assessment and Management Study' for the Eastern District, and to implement and have regard to the recommendations of the 'Coastal Defence Strategy' for the County. Also welcomed, is the stated intention of the Council to liaise as appropriate with the OPW and Climate Action Regional Office on progressing a Pilot Coastal Monitoring Survey Programme, which will inform future decisions on coastal management and defence measures in the County.

In relation to air and noise pollution, the Council has adopted the 'Dublin Regional Air Quality Management Plan and the 'Dublin Agglomeration Environmental Noise Action Plan' and has an established primary air quality monitoring station as part of the planned regional network of stations under the direction of the Environmental Protection Agency. The draft CDP also includes policy objectives to facilitate the provision of strategic energy infrastructure and telecommunications infrastructure, including broadband connectivity and other technologies, within the County.

A Strategic Flood Risk Assessment (SFRA) was undertaken of the Plan area having regard to the requirements of the Planning System and Flood Risk Management Guidelines for Planning Authorities and is set out in Appendix 16 of the draft CDP. A two-stage assessment of flood risk was undertaken, to identify flood risk and develop Flood Zone maps which confirmed that a proportion of zoned lands are at flood risk, and to highlight development areas that require more site-specific assessment. The

SFRA provides guidelines for development within the areas at potential risk of flooding and looks at the potential for development across the County.

The draft CDP is accompanied by the publication of 14 Flood Zone Maps which highlight the areas of flood risk concern including Flood Zones A and B. It is stated in the SFRA review and monitoring that outputs from future studies and datasets should be incorporated into any update of the SFRA as availability allows.

The Regional Assembly welcome the Council's commitment to the provision of high-quality infrastructure to ensure there is adequate capacity to support future development and will promote enhanced co-ordination between local authorities and infrastructure agencies for the delivery of strategic enabling infrastructure in a plan led manner, including through the fora of RSES and MASP Implementation Groups.

11. Heritage and Conservation

This Chapter includes specific objectives and guidance relating to the protection of the County's archaeological and architectural heritage as provided for in the DLR Heritage Plan. It is supported by the Record of Monuments and Places for DLR, which is listed in Appendix 4 of the draft CDP and the Record of Protected Structures also listed in Appendix 4 and shown on the County Development Pan Maps. A full list of Architectural Conservation Areas (ACAs) is also listed in Appendix 4, along with a number of candidate ACAs which will be assessed in accordance with the assessment criteria are set out in the Planning and Development Act, 2000 (as amended) and the 'Architectural Heritage Protection Guidelines for Planning Authorities.

It is a policy objective in the draft CDP to support the preparation of the third County Heritage Plan 2021 – 2025. In this regard the RSES emphasises the benefits of heritage led urban regeneration for example through the protection of historic urban fabric, the reuse of historic buildings and the enhancement of places of cultural or natural interest, which can play a key role in driving tourism and economic development in terms of placemaking and enhance the vibrancy of historic town centres.

12. Other

Chapters 12 -14 set out Development Management Standards, Land Use Zoning Objectives and Local Objectives to be applied to future development proposals and are considered to provide a comprehensive framework for the assessment of planning applications in the County. It is noted that a new land use zoning for 'Sustainable Neighbourhood Infrastructure' is proposed and the Assembly's comments in Section 4.0 'Neighbourhood - People, Homes and Place' should be noted in this regard.

The inclusion of a dedicated Chapter 15 'Implementation, Monitoring and Evaluation' is welcomed as is the recognition given to monitoring of delivery in the Core Strategy of the draft CDP. The Council is to be commended for the inclusion of monitoring mechanisms to be put in place to ensure effective delivery of the CDP and for greater transparency on the progress made in its implementation.

The attention of the Council is also directed to the development of an emerging Regional Development Monitor by the Regional Assembly, which is aligned to National and Regional Strategic Outcomes in the NPF and RSES, and which may provide additional guidance in monitoring the delivery of local authority development plans. The comments set out in Section 2.8 above will be relevant in this regard.

13. Strategic Environmental Assessment (SEA) /Appropriate Assessment (AA)

The Assembly welcomes the preparation of the draft CDP in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA).

The SEA environmental report sets out the iterative process to date including an assessment of the overall environmental effects arising from the draft CDP provisions. Taking into account the integration of various recommendations and mitigation measures arising from the SEA, AA and SFRA processes into the draft CDP, which are detailed in the environmental report, it was determined that significant residual adverse environmental effects will not occur through implementation of the CDP.

The attention of the Council is drawn to EPA Guidance on SEA Statements and Monitoring (Second Review of Strategic Environmental Assessment Effectiveness in Ireland), published January 2020, which provides best practice on devising monitoring measures, suitably detailed indicators and the frequency of monitoring and reporting. This guidance shall inform the iterative SEA process and preparation of the monitoring programme as part of the County Plan's SEA statement.

The draft CDP is subject to Appropriate Assessment (AA) and a Natura Impact Report (NIR) has recorded the decisions that were taken during its preparation. It is concluded that the draft CDP is not foreseen to give rise to any significant effects on designated European Sites, alone or in combination with other plans or projects. The AA process is ongoing and will inform and be concluded at adoption of the CDP.

Conclusion

It is considered that the Draft Dún Laoghaire-Rathdown County Development Plan 2022-2028, and in particular the Core Strategy, can achieve consistency with the Regional Spatial and Economic Strategy (RSES) 2019-2031 by addressing the recommendations and observations set out above.

The Regional Assembly welcomes the publication of the Draft Dún Laoghaire-Rathdown County Development Plan, which marks the beginning of the alignment of planning policy at county and local levels with Regional and National Policy. It should be noted that the officials of the Regional Assembly are available to discuss the matters raised above and welcome further opportunities to engage in the statutory process of the making of the Dún Laoghaire-Rathdown County Development Plan.

Regards,



Jim Conway
Director
Eastern and Midland Regional Assembly
16th March, 2021