

Planning and HR Department  
An Rannóg um Pleanáil agus Acmhainní Daonna  
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7th November 2017

NPF Submissions,  
Forward Planning Section,  
Department of Housing, Planning and Local Government,  
Custom House,  
Dublin D01 W6X0

**Re: National Planning Framework – Draft NPF**

Dear Sir or Madam,

Dun Laoghaire- Rathdown County Council welcomes the opportunity to make a submission on the Draft National Planning Framework. We welcome the preparation of spatial plan at a national level, and generally support the principles underlying the draft NPF. Nevertheless, we would like to raise some concerns relating to in a number of key areas, and to request that consideration be given to a number of possible amendments prior to the formal adoption of the finalised NPF. The topics of concern covered in this submission are as follows.

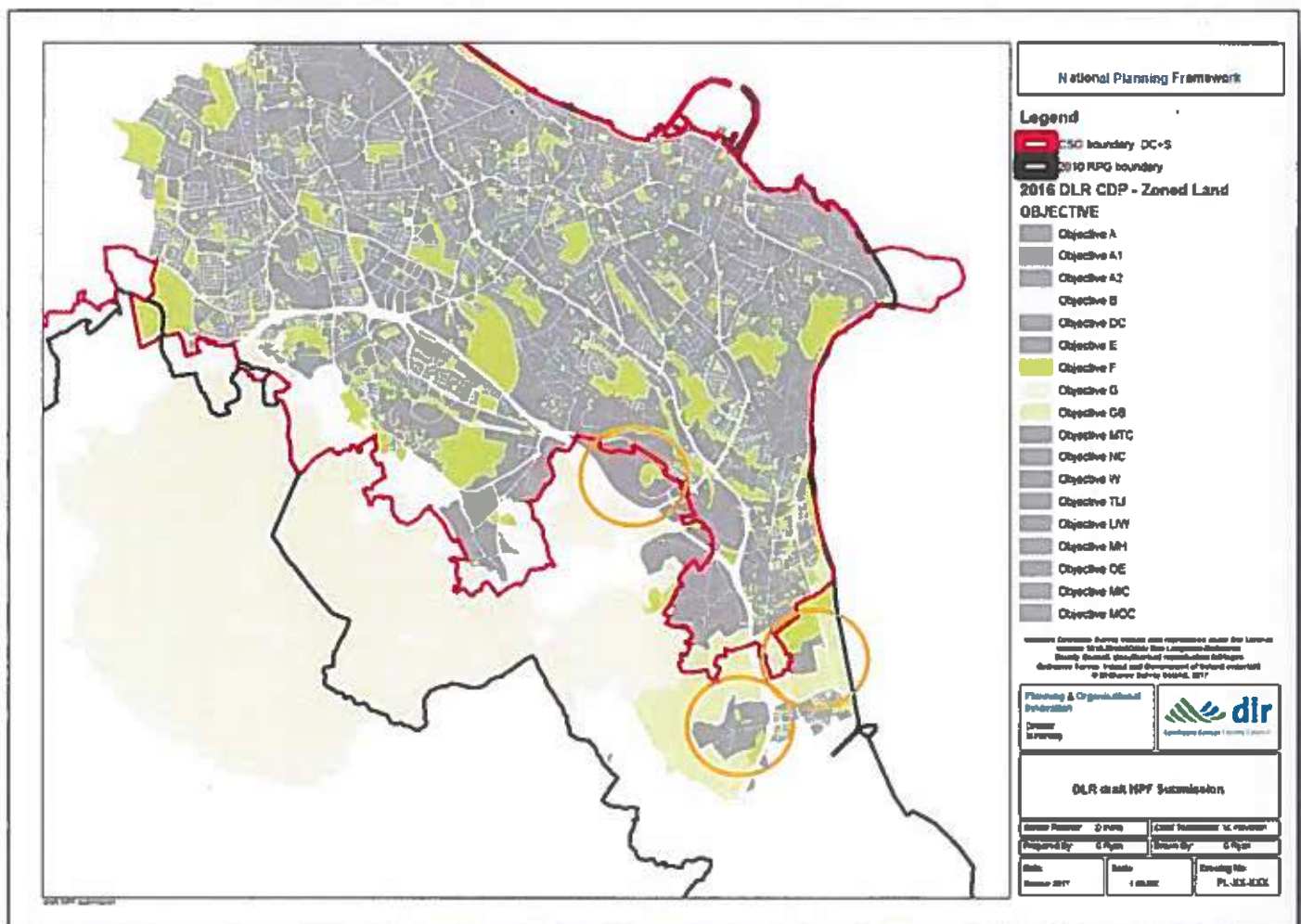
- Definition of Metropolitan Boundary for Dublin
- Sections relating to Development Management and Active Land Management
- Employment lands – quantity and location
- More detail relating to the background figures and modelling behind the growth targets
- Inter-regional and Intra-regional growth targets
- Metropolitan Area Strategic Plans (MASPs)

In very broad terms it is our contention that, while the narrative of the NPF appears to be supportive of the aspirations of all Regions and cities, the stated growth targets effectively amount to a suppression of natural growth in the Dublin Region counterbalanced by a rapid and exponential acceleration of growth in other city regions. It is our contention that both aspects of this strategic model represent an acute shift from long standing and well embedded patterns that is undesirable, unsustainable, and likely to prove unachievable.

## 1. Definition of Metropolitan Boundary for Dublin

National Policy Objective 3b requires that at least 50% of all new homes in the five cities be delivered within the built-up envelope of existing urban settlements, with Item 12 of Appendix 3 defining this envelope as being the boundary defined by the CSO in line with UN criteria.

While this evolving CSO boundary<sup>1</sup> presents a useful and cohesive unit for statistical analysis, we would question whether it is appropriate as the de facto metropolitan boundary for Dublin. In particular we note the CSO boundary's relationship to the boundary for Metropolitan Dublin as set out in the 2010 Regional Planning Guidelines<sup>2</sup>, and also to the existing development boundary (as defined by the footprint of 'zoned' lands) within the 2016-2022 Dun Laoghaire-Rathdown County Development Plan<sup>3</sup>, as shown below.



<sup>1</sup> [http://census.cso.ie/sapmap2016/Results.aspx?Geog\\_Type=ST2016&Geog\\_Code=EED4C2E4-43BA-428E-96FC-1C65CC0A4340](http://census.cso.ie/sapmap2016/Results.aspx?Geog_Type=ST2016&Geog_Code=EED4C2E4-43BA-428E-96FC-1C65CC0A4340)

<sup>2</sup> <http://emra.ie/dubh/wp-content/uploads/2015/02/Greater-Dublin-Area-Regional-Planning-Guidelines-2010-2022-Volumell.pdf>

<sup>3</sup> <https://dlrcocouncil.maps.arcgis.com/apps/webappviewer/index.html?id=1dd5eacc9af24f4f8b2cd30ebb54a4c3>

There is an inherent 'artificiality' underpinning the CSO methodology insofar as it simply reflects the 'here and now' on the ground without any real reference to wider local planning policy and zoning provisions. The areas listed below, and indicated by way of orange circles on the map above, are identified within the 2016-2022 DLR CDP Core Strategy as key areas for development, have been appropriately zoned for such and are currently at various stages in the planning and implementation 'pipeline'. Notwithstanding their considerable latent development potential for the delivery of residential units of scale, they actually fall outside the Metropolitan boundary advocated by the NPF:

- Cherrywood (majority)
- Woodbrook
- Old Conna

As a stark example it is noted that while (i) the development of Cherrywood is specifically referenced in the Draft NPF as a 'key enabler' for growth in Dublin, and (ii) the Woodbrook-Shanganagh LAP area is designated both as a MUHD and a LIHAF site both areas are effectively 'outside' the CSO defined Metropolitan boundary.

We note the target pattern of development for the Eastern and Midland Region set out in Table 2.1 of the Draft NPF, which requires that 50% of new housing be within the CSO boundary for Dublin City and Suburbs and 30% on infill/brownfield elsewhere- presumably in towns across the Region. The remaining 20% of housing allocation is likely to be highly 'contested' between Local Authorities at a Regional level, and it may consequently prove difficult to secure policy support for the development of key strategic sites (such as those referenced above) in that context.

We fully recognise that the earlier Metropolitan boundary set out under the 2010 Regional Planning Guidelines (shown in black on the map above) does not represent an appropriate footprint for consolidation. However, nor does the CSO boundary. While we welcome the principle of a cohesive and consolidated footprint for Metropolitan Dublin, we feel the boundary of that footprint needs finessing to take cognisance of strategic planned development, and would recommend the following.

Recommendation 1:	That the boundary for 'Dublin City and Suburbs', to which National Policy Objective 3b, Table 2.1, and Table 3.1 apply, be extended from the CSO defined boundary to include and incorporate immediately adjacent areas of zoned lands.
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## 2. Sections Relating to Development Management and Active Land Management

We recognise the existing challenges for local authorities in implementing City, County, and Local Area Plans on the ground, and the on-going evolution of practice and policy in the area of Active Land Management. We would welcome additional instruments and resources being made available to Local Authorities in this area. However, we would question whether the NPF – a high level planning framework - is the appropriate platform for such matters. In our opinion, a range of measures might reasonably be examined that could implement the high-level objectives of the NPF

In particular we note Appendix 1 , 'A Methodology for a Tiered Approach to Land Zoning'. While we consider this section to be misplaced in the NPF, we would also seriously question the merits of introducing the pattern of land ownership as a material consideration in the plan making process. We would like to see options explored whereby zonings would continue to be based on sound planning principles, with efforts made to empower Local Authorities to deliver on these zonings. Specifically, references are made in the Draft NPF to encouraging landowners to cooperate to deliver services on a pro-rata basis relative to development yield and, in the absence of this cooperation, Local Authorities are to use CPO powers to enable development. The extremely costly nature of CPO in areas such as Dún Laoghaire-Rathdown, with some of the highest land values in the State, renders it a tool of limited practical use. Active land management will only be effective in a situation where land values can be controlled. Aspirational statements about 'encouraging cooperation' and 'using CPO powers' understate the difficulties that emerge for Local Authorities with the huge increase in land values following rezoning and the limited 'toolkit' available to implement local plans. In a similar vein, we consider that National Policy Objectives 10 and 11, which concern themselves with more 'fine grain' development standards, address issues that might be better dealt with under statutory planning guidance from the Department. On the content of National Policy Objective 11 itself, we would contend that to date DLR has successfully applied national and local planning policy with appropriate levels of flexibility and pragmatism.

Recommendation 2:	Omit National Policy Objectives 10, 11, 67, 68 and and Appendices 1 and 2 and surrounding commentary. Revisit the detailed issues raised in these sections as a matter of priority within the work programme of the Department of Housing, Planning and Local Government, with a view to producing updated and pragmatic departmental guidance and/or primary legislation in the area of Active Land Management.
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### 3. Employment Lands – Quantity and Location

Section 3.7 and National Policy Objectives 9a and 9b discuss employment growth in a spatial sense. We would urge that there not be an undue focus on a necessity for immediate 'proximity' between residential and employment areas, but rather 'connectivity' in a broader sense. We consider that appropriate policies around employment lands can be achieved in the Dublin Metropolitan Area by way of integrated land use and transportation planning - focused on the established public transport networks that have developed and improved incrementally over the last twenty years. We remain to be convinced, however, that the public transport imperatives that pervade and underpin the employment lands context in the Draft NPF are capable of being realised or replicated to the required degree in the other four regional cities within the twenty year timeline of the National Planning Framework. The increased frequency of 'job change', particularly among younger members of the labour force, also means that the location of employment in Dublin must be seen in the broader perspective of the Dublin labour market and how this market functions on a Regional basis.

#### 4. Background Figures and Modelling for Growth Targets

Reference is made in Section 2.2 of the Draft NPF to 'business as usual' projections and in Section 2.3 to a 'range of options' having been considered, yet there is a complete paucity of supporting information presented in this regard by way of statistics, models and/or background papers. This makes it very difficult for parties in the consultation process, such as DLR and other Local Authorities, to formulate evidence-based positions on the policies and content of the NPF.

We note in particular that current population and economic trends - continued to 2040 - were analysed by the Economic and Social Research Institute as a baseline from which alternative scenarios and strategies were to have been developed. It is difficult to assess the extent to which the Draft NPF represents a divergence from existing trends and forecasts without having open access to this information. To facilitate meaningful inputs to this process we believe that this information must be presented by way of appendices in the adopted finalised NPF.

Analysis carried out by Dún Laoghaire-Rathdown of the stated NPF population targets confirm that the projected rate of growth up to 2040 for Dublin City and Suburbs area (which includes the majority of Dún Laoghaire-Rathdown) will be significantly lower than the growth rate that has prevailed over the last two Census periods. It is difficult to reconcile many of the statements in the Draft NPF about "*supporting the continued growth and success*" of Dublin with the actual stated policy of reducing the rate of population growth at the Metropolitan heart of the Region. The substantial reduction in growth forecasts for the non-Dublin Counties in the Eastern and Midlands Region can be justified on sound planning and sustainability principles but the reduction in the forecast rate of growth of Dublin City and Suburbs – particularly in the context of its perceived 'underperformance' in housing delivery in recent years – cannot be justified. From a purely local perspective the Core Strategy target housing figures in DLR over the last two County Development Plan cycles have been in the order of c.2300 units per annum. Taking the NPF targets to 2040 at face value (and assuming DLR were to 'retain' its proportionate 'share' of the wider Regional figure going forward) would see target housing numbers in this County dropping dramatically to slightly less than 1000!! This at a time when the 2017 Q3 returns to the Dublin Housing Task Force are showing 1570 dwelling units currently under construction in the County!

Recommendation 3:	Present the baseline forecasting and scenario modelling prepared by the Department and/or the Economic and Social Research Institution alongside the target figures from the NPF to allow for objective and evidence-based analysis of the NPF.
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## 5. Inter-Regional and Intra-Regional Growth Targets

A comparison of the CSO's 2013 regional population projections for 2016-2031<sup>4</sup> with the Regional targets set out in National Policy Objectives 1a, 1b, and 1c of the draft NPF show that the strategy set out is a radical departure from 'business as usual'. Our analysis (see Appendix 1 below) indicates that the East+Midlands Region would have its natural growth artificially suppressed, while the South and North+West Regions would see their 'annual average population increase' jump by over 200% and 450% respectively. We have some difficulty with these two figures and would seriously question how realistic is their deliverability?

For a host of reasons, we would question whether such a radical shift in population targets is achievable with the range of policy instruments available to the Irish planning system and, indeed, the Irish government. We would question the merits of setting such high targets for the South and North+West, and we would equally question the merits of restricting the growth of the East+Midlands Region, which contains the city-region that is increasingly recognised as the engine room of the nation's economic growth.

While we appreciate the underlying policy shift towards a greater balance of regional development, we would consider it prudent, practical and realistic to plan for a scenario whereby the 3 Regions would grow at rates more closely approximating the forecast growth rates, and to allow for the Regional Assemblies to apportion this growth in a considered and sustainable fashion - to the principles set out in the NPF- by way of the RSES process.

<b>Recommendation 4:</b>	To rebalance the regional targets set out in National Policy Objectives 1a, 1b, and 1c to levels that would align with the CSO's Regional Population Projections 2013 (revised as necessary.)
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At a Metropolitan level, we note with some concern the population growth rates set out in Table 3.1 of the NPF for Dublin, Cork, Limerick, Galway, and Waterford. All cities are shown growing at 50-60% except for Dublin, which would be reduced to 20-25% growth over the Plan period. This requires to be revisited.

While we welcome the objective of supporting Cork, Limerick, Waterford, and Galway to accelerate their growth, we consider this policy to show a lack of faith in Dublin to continue to grow at scale, as it has done to date. We note in particular the presence of good quality public transport networks within the Dublin Region, as well as the advanced planning work on a number of additional key public transport infrastructure projects that, when implemented, will serve to increase capacity along a sustainable development model.

<b>Recommendation 5:</b>	To rebalance the Metropolitan growth targets set out in Table 3.1 such that all cities would grow at the same rate.
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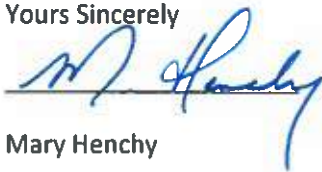
<sup>4</sup> <http://www.cso.ie/en/releasesandpublications/er/rpp/regionalpopulationprojections2016-2031/#.VK6p48n2QqE>

## 6. Metropolitan Area Strategic Plans

The proposal to introduce statutorily-backed Metropolitan Area Strategic Plans (MASPs) for the five Cities – and their proposed twelve year lifespan - is noted. However, other than a single reference that the MASPs will be prepared “... in tandem with and as part of the RSES process...” (p. 126) there is complete paucity of information in relation to such matters as governance, lead agency and the role of the relevant local authorities in the overall process. It is recommended that the final NPF document ‘flesh out’ in more detail how it is anticipated this overall process is to be advanced in practical terms – and in particular the roles and responsibilities of, and contributions likely to be required from, the local authority stakeholders.

Please note that while this submission was prepared by the Council Executive a presentation on the Draft NPF and the likely content of the nascent submission was presented to the Council’s Planning Strategic Policy Committee to which all other DLR Councillors were invited. The positions and recommendations being mooted in this submission – particularly in relation to the artificial suppression of growth in the Dublin City and Suburbs – were tacitly supported by both the Elected Members and the SPC Sectoral Interests present at that meeting.

Yours Sincerely



Mary Henchy

Director of Services

Planning and Human Resources

# Appendix 1 – Inter-Regional population projections – CSO 2013 v NPF 2017

## ALL FIGURES in THOUSANDS

**Table 1 Actual and projected population of Regional Authority areas<sup>1</sup>, 2011 and 2031 (M2F2 Traditional)<sup>2</sup>**

Regional Authority area	Population 2011	Natural increase	Internal migration	External migration	Total increase	Population 2031	Average annual increase
Border	516	49	-22	-9	18	533	0.2
GDA	1,795	288	92	11	401	2,197	1.0
Dublin	1,262	188	47	23	257	1,519	0.9
Mid-East	534	110	45	-11	144	678	1.2
Midland	284	39	-21	7	25	309	0.4
Mid-West	378	43	-10	-1	32	410	0.4
South-East	499	58	-16	9	51	550	0.5
South-West	662	80	-18	8	71	733	0.5
West	441	31	-6	-10	15	456	0.2
State	4,575	598	0	15	613	5,188	0.6
<sup>1</sup> Defined in Background Notes							



	CSO pop 2011	CSO growth to 2031	CSO Pop 2031	CSO Ave Annual Increase %	CSO Region increase as % of national	Draft NPF population 2017*	Target NPF Pop 2040**	NPF Ave Annual increase %	NPF Region increase as % of national
East and Midlands	2,079	427	2,506	1.03%	69.57%	2,325	2800	0.89%	45.59%
North and West	956	33	990	0.17%	5.42%	847	1000	0.79%	14.68%
South	1,539	153	1,693	0.50%	25.02%	1,586	2000	1.13%	39.73%
total	4,575	613	5,188	0.67%		4,758	5,800	0.95%	

\* source: Table 4.2.1 of NPF 'Issues and Choices' paper February 2017

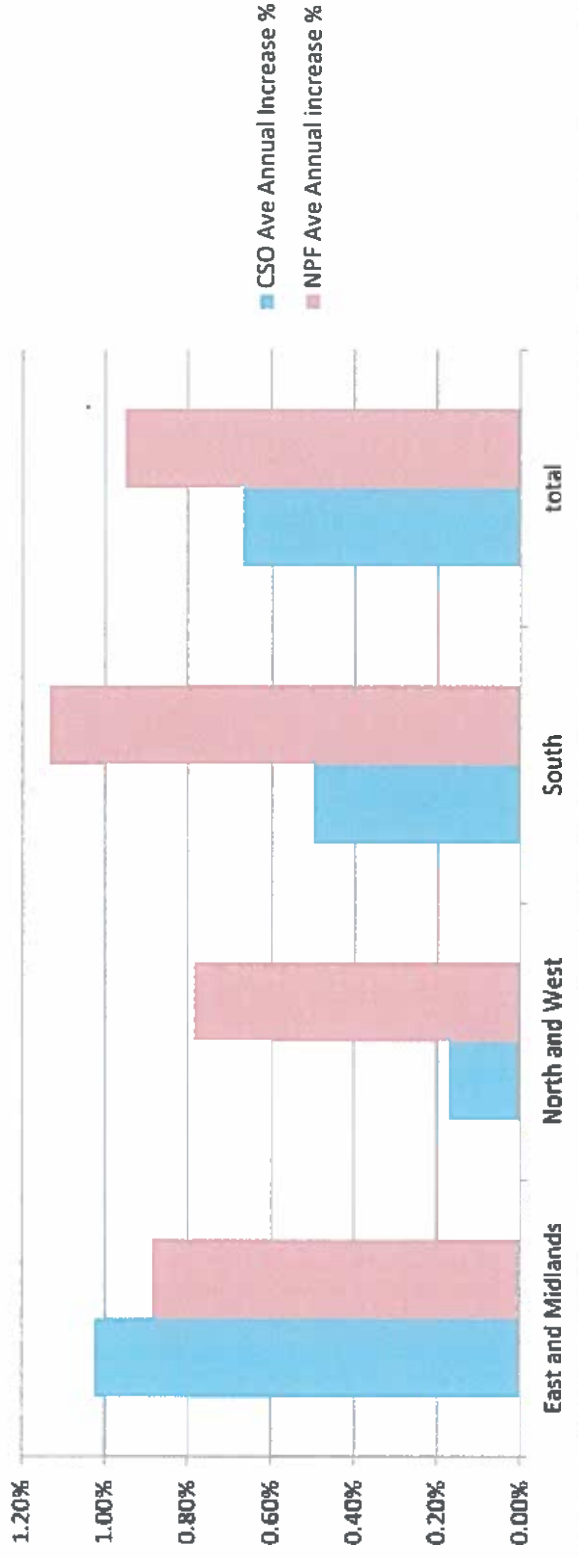
Note: Louth is included in the border region for CSO and the Eastern Region for NPF. Should not affect broad average annual increases, would impact on region as % of National Figures

\*\*source: Draft NPF section 2.3

\*\*\* Source of CSO projections <http://www.cso.ie/en/releasesandpublications/er/rpp/regionalpopulationprojections2016-2031/#.VK6p48n2QqE>

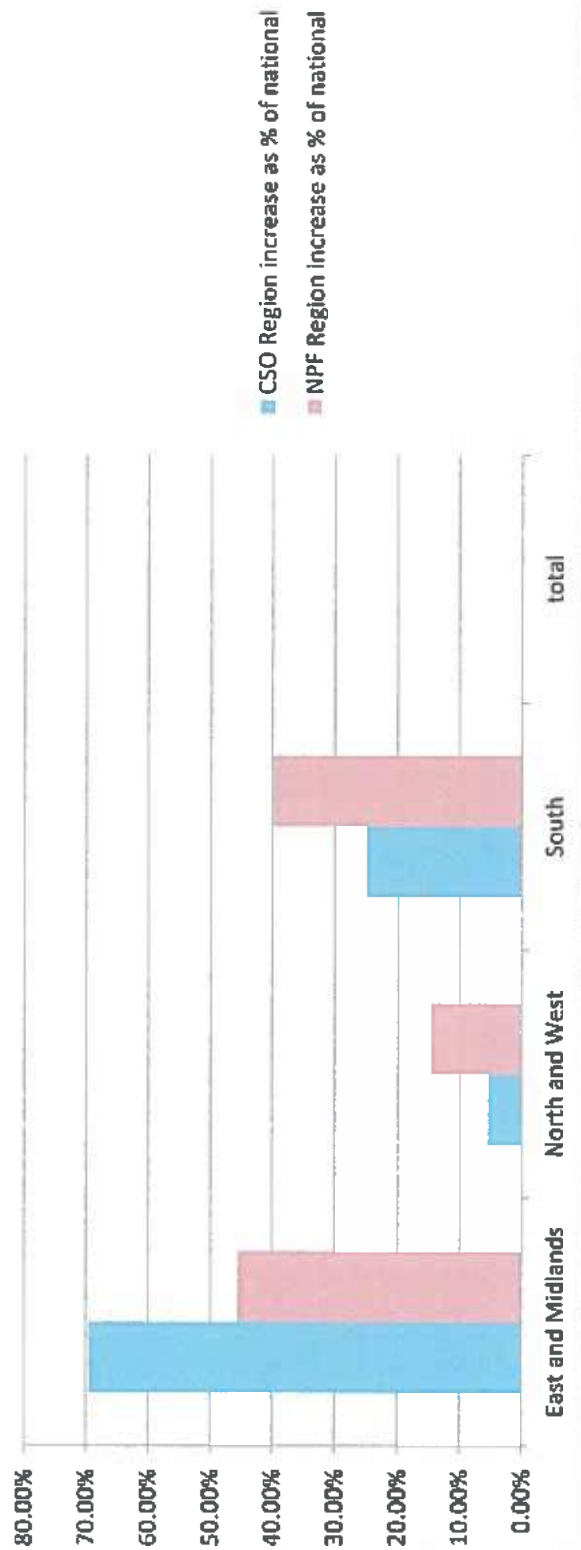
# CSO population projections versus policies of Draft NPF

## Annual Average Increase



# CSO population projections versus policies of Draft NPF

## Region growth as % of National Growth



**Appendix 2 – Intra-regional population trends – CSO v NPF**

	1986	1991	1996	2002	2006	2011	2016	NPF 2040
<b>Dublin City &amp; Suburbs</b>	920,956	929,090	952,692	1,004,614	1,045,769	1,110,627	1,173,179	1,437,000
Per annum +		1,627	4,720	8,654	10,289	12,972	12,510	10,993
<b>of which DLR suburbs</b>		180,693	184,829	186,641	188,761	201,074		
Fingal suburbs		71,947	77,331	93,011	114,623	130,436		
South Dublin suburbs		198,061	208,678	229,181	236,174	251,505		
<b>County Population</b>								
DLR	180,675	185,410	189,999	191,792	194,038	206,261	218,018	
Fingal	138,479	152,766	167,683	196,413	239,992	273,991	296,020	
SDCC	199,546	208,739	218,728	238,835	246,935	265,205	278,767	
DCC	502,749	478,389	481,854	495,781	506,211	527,612	554,554	
Dublin (Four Counties)	1,021,449	1,025,304	1,058,264	1,122,821	1,187,176	1,273,069	1,347,359	
<b>Housing</b>								
Dublin City & Suburbs Housing		313,351		343,161	373,123	411,813	422,182	143,000
Per annum +				4968	4994	6448	1728	5958
<b>Regional</b>								
Dublin	1,021,449	1,025,304	1,058,264	1,122,821	1,187,176	1,273,069	1,347,359	
Kildare	116,247	122,656	134,992	163,944	186,335	210,312	222,504	
Laois	53,284	52,314	52,945	58,774	67,059	80,559	84,697	
Longford	31,496	30,296	30,166	31,068	34,391	39,000	40,873	
Louth	91,810	90,724	92,166	101,821	111,267	122,897	128,884	
Meath	103,881	105,370	109,732	134,005	162,831	184,135	195,044	
Offaly	59,835	58,494	59,117	63,663	70,868	76,687	77,961	
Westmeath	63,379	61,880	63,314	71,858	79,346	86,164	88,770	
Wicklow	94,542	97,265	102,683	114,676	126,194	136,640	142,425	
<b>EMRA</b>	1,635,923	1,644,303	1,703,379	1,862,630	2,025,467	2,209,463	2,328,517	2,800,000

EMRA Per annum +	1,676	11,815	31,850	32,567	36,799	23,811	19,645
EMRA Intercensal growth	8,380	59,076	159,251	162,837	183,996	119,054	
<b>Annualised Growth</b>							<b>NPF</b>
DC&Suburbs Per annum +	1,627	4,720	8,654	10,289	12,972	12,510	<b>Target</b>
EMRA Minus DC&Suburbs Per annum +	49	7,095	23,197	22,279	23,828	11,300	10,993
Dublin City & Suburb Growth	8,134	23,602	51,922	41,155	64,858	62,552	8,652
Percentage of Regional Growth	97	40	33	25	35	53	50



