



NPF Submissions,
Forward Planning Section,
Department of Housing, Planning, Community & Local Government,
Custom House,
Dublin 1
D01 W6X0

30th March, 2017

Re: Submission on 'Ireland 2040 Our Plan - National Planning Framework'

Dear Sir or Madam,

1.0 Introduction

The National Planning Framework (NPF) provides a 'game-changing' opportunity to facilitate good planning and help Ireland face the daunting challenges of today, such as the housing crisis and climate change, but also the opportunity to create a place with the ability to guarantee quality of life. Fingal County Council (FCC) welcome this opportunity to input into the preparation and drafting of the NPF.

FCC recognises and welcomes the broad range of issues which have been outlined in the NPF *Issues and Choices* paper. Fingal are fully committed to contributing to the future sustainable development of Ireland and recognise the important role that the NPF will play in creating a vision that provides for the creation of attractive places which contribute positively to people's health and well-being, in an environmentally responsible manner that does not compromise the ability of future generations to meet their needs. In this regard the recently adopted Fingal Development Plan 2017-2023 (FDP) places increased emphasis on policies which support sustainability, place making and a transition to a low carbon, climate resilient and environmentally sustainable economy. This submission acknowledges the commitment of the NPF team to the inclusion of the principles of sustainable development as a cross cutting theme in the creation of a NPF for Ireland and FCC reiterate their commitment to the implementation of national policy in this area. Accordingly, the submission, rather than reiterating a commitment to areas where it is recognised that robust national policy exists, focuses on areas where it is believed that the NPF would benefit in terms of further policy development.

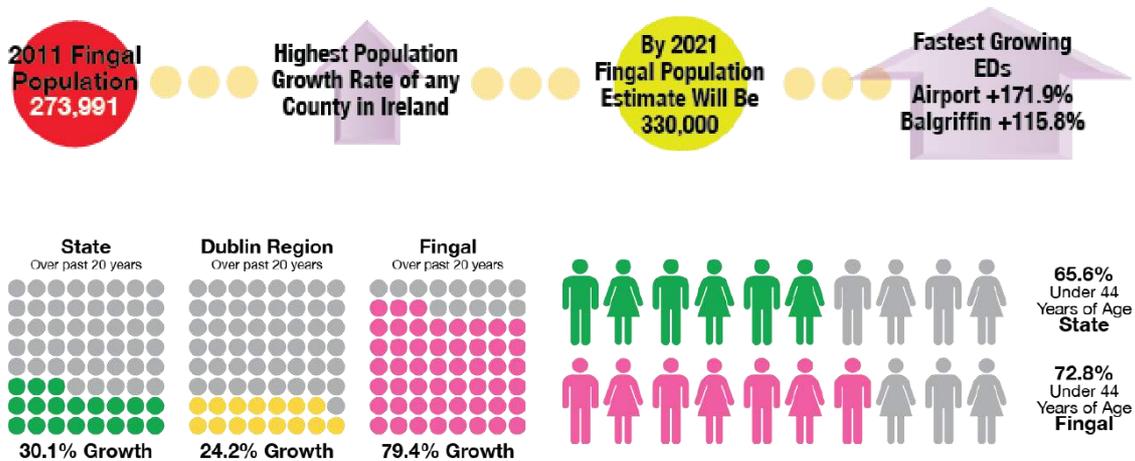
Taking an all-Island approach FCC wish to highlight and prioritise:

- Acknowledging Fingal's uniqueness of place (Metropolitan, rural, river valleys and upland areas, coastal, and Dublin Airport)
- Protecting Dublin city region in Brexit uncertainty

- Unlocking Fingal. Planned new urban expansion and consolidation of Dublin city region through series of connected conurbations
- Role of Swords in supporting the development of Dublin as a global city
- Developing a sense of place in towns and improving attractiveness of rural villages
- Key Infrastructure requirements

2.0 Ireland’s National Planning Challenges

The big question posed is ‘What sort of place should Ireland be in 2040 and what do we need to do to achieve this?’ In response to the ‘big question’ we suggest the need for a clear, compelling and distinctive vision for how Ireland will develop and change, whilst fostering the potential of Fingal. We suggest that **Ireland 2040 should be a place with the ability to guarantee quality of life**. This future vision encapsulates the four headline themes contained within the position paper.



Source: Fingal Local Economic and Community Plan (2016)

Fingal had one of the largest population growth rates of 14.2% in 2011 Census and was the fastest growing constituency, 8.1% in CSO 2016 (preliminary), and with a significant stock of available land has the potential to be a key vehicle to help in the delivery of the vision for Ireland 2040. The fundamental role Fingal can play is also recognised in *Rebuilding Ireland* through the designation of four Major Urban Housing Development Sites (MUHDS) within the County earmarked as a priority for accelerating the delivery of housing on strategic sites. The role that key supporting settlements, such as Swords, which is positioned number two in the top ten neighbourhoods in Dublin for first time buyers in 2016 (The Irish Times, 2017), can play in the delivery of Dublin’s role as a developing global city should not be ignored. Integrated transport solutions such as Metro North are crucial to facilitate this role.

A new Development Plan for Fingal, Fingal Development Plan 2017-2023 (FDP), came into effect on the 16th March 2017. The strategic vision of the new FDP is to build on previous successes and to strengthen our strategic advantage as a County, to ensure that we utilise the strengths of our citizens, communities, built and natural heritage, infrastructure and tourism to their full potential. Cross cutting themes underpinning the FDP include sustainable development, climate change adaption, social inclusion, high quality design and resilience. The principles of these themes are embedded in the FDP and are integral to the four headline themes identified in the *Issues and Choices* position paper.

This submission draws from the recently adopted FDP and is structured to correspond with the Issues and Choices paper’s four headline themes of People’s Health and Well-Being; Place-Making; Climate Change and Sustainability; and Infrastructure. The submission addresses the interconnections and interactions between the themes and responds at a national, strategic and ‘spatial’ focus.

3.0 People’s Health and Well-Being

3.1 What does the NPF mean for Health and Well-Being?

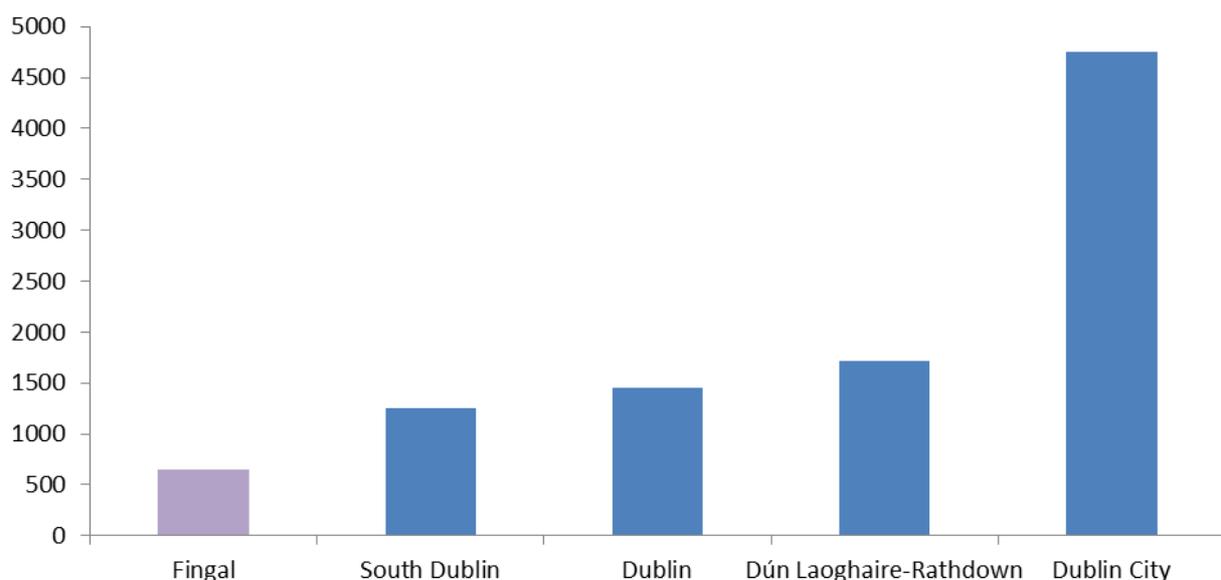
The built environment is an important determinant of health, both directly and indirectly. How we ‘make’ places has a huge influence on people’s health and wellbeing (*Issues & Choices*, page 17). Fingal seeks to foster a growing low carbon economy which provides opportunities that are more fairly distributed between, and within, all our communities. We aim to provide high quality, vibrant and sustainable places with enough high quality homes.

The NPF should pursue the happiness and well-being of the nation. An overarching aim of NPF should be to create and sustain people-friendly places for the benefit of the residents and businesses of Ireland, whilst supporting developers seeking to deliver the highest quality design solutions.

3.2 Trends Influencing our Health and Wellbeing

The financial climate has reduced the amount of new housing built in recent years. The consequent housing crisis is having a direct negative influence on peoples’ health and wellbeing in Ireland. Data shows that Fingal is the fastest growing County in Ireland, and four of the top 10 fastest growing areas nationally are located in the County. Population has increased from 167,683 (census 1996) to 296,294 (census 2016). Nonetheless, a stock of land remains available in the county for residential development and as observed in Figure (1), the population density of Fingal is the lowest of any of the four administrative areas in the region.

Figure (1): Population density (per sq. km) in the Dublin City Region



Source: FCC analysis of CSO data

Over the next 14 years, the population of Dublin is forecast to grow by 22% to 1.63 million. This will place further pressure on services but it also represents an opportunity and economic asset. It is essential that Fingal continues to grow in order to support the sustainability of Dublin City. The NPF should recognise the role that Fingal and Swords in particular, play in this regard.

In the coming years, Fingal is well positioned to accommodate the required significant increase in house building (as recognised in government programmes) to ensure housing requirements are met across the region.

3.3 Linking Health and Well-Being to Place

The *Issues and Choices* paper recognises that the current spatial pattern of development presents a challenge for improving both social cohesion and healthy lifestyles. In Fingal we are, through placemaking, pursuing the creation of sustainable and healthy communities by supporting the development of adequate housing, retail, leisure, and employment uses, quality public realm, community facilities, design and standards and open space throughout the County. Planning can ensure it enhances quality of life through good placemaking, and lead a move towards new, lower carbon models of urban living. More empowered communities will have a key role to play in this.

FCC seeks to ensure that Fingal is developed in such a way as to make best use of our assets and to ensure Dublin continues to develop in a manner that benefits the Country. The role of the NPF is to help create high quality, diverse and sustainable places that promote well-being and attract investment. FCC will support growth in priority sectors and locations, and promote a place-based approach to development. The Council aims to capitalise on the distinctive potential of Fingal as an economic driver, reinvigorate our towns and encourage innovation in our rural areas. The recently adopted FDP seeks to contribute to the creation of a more socially inclusive, equal and culturally diverse society by providing for appropriate community infrastructure, quality public realm and improving access to information and resources.

Flexibility is required to allow for different approaches to housing provision that respond to varying local requirements. The NPF should focus on areas such as Fingal, where the greatest levels of change are expected and where there is pressure for development. Accordingly, the NPF should ensure these areas are highlighted and given the opportunity to develop in a meaningful way.

Fingal is ideally placed to continue to be a focus for investment in the coming years. The FDP recognises our key strengths and the distinctive assets of Fingal. Fingal's relationship with the surrounding Dublin region and the wider eastern seaboard area is unique due to its location within the region and the availability of zoned serviced lands.

Quality town and urban centres are key assets for attracting investment and providing services. Quality of place is fundamental to people's well-being and the success of areas. In Fingal, we will deliver ambitious, up-to-date Masterplans and frameworks for town and urban centre development. These will focus on the quality, sustainability and resilience of the built environment and wider public realm, and on improving accessibility by public and sustainable transport modes, such as cycling.

Reducing the impact of the car on city and town centres will make a significant contribution to realising their potential as sustainable places to live and invest by addressing congestion, air pollution and noise and improving the public realm. Significant health benefits can be achieved by substantially increasing active travel within our most densely populated areas.

Further increasing the density of development, particularly in the centre of towns and urban areas and in key locations which are well-served by public transport, can accommodate much of the anticipated growth.

Swords, as the County town is the main driver of our economy, with the Dublin 15 area and Balbriggan key locations in our economic strategy and fundamental elements of our vision for future growth. Both the FDP and *Your Swords An Emerging City Strategic Vision 2035* (Fingal County Council, 2008) promote Swords and seek to facilitate the sustainable development of Swords as a vibrant consolidated major town with a thriving economy; an integrated public transport network; an attractive and highly accessible built environment with the highest standards of housing, employment, services, recreational amenities and community facilities. The vision for Swords is to “develop Swords as an ‘Emerging Green City’”. Building on the Swords Vision document, the FDP develops proposals for the area to drive employment and economic development across the County.

Swords has direct links to the national road network (M1 and M50) and is located on the Dublin/Belfast economic corridor. Swords with its large undeveloped land bank and highly accessible location offers a unique opportunity for Dublin, while continuing to support the growth of the City region as a whole. In this regard a future Metro North will connect Swords to Dublin City via Dublin Airport supporting the development of Swords, up to a population of 100,000.

Fingal County Council has ambitious plans for growth in the development areas identified by the Metro Economic zoning designations. The recent zoning of this land reflects the importance of this infrastructural investment for both Swords and the entire County and will support the development of a new vibrant planned sustainable mixed use urban district providing for a significant level of employment and residential development.

Likewise Dunsink, within the M50, offers an opportunity to significantly consolidate Dublin city region in a sustainable manner, underpinned by high quality public transport, given the site benefits from close proximity to the existing heavy rail network at Ashtown and the proposed extension of the Luas to Finglas. In addition, commercial development would benefit from access to the nearby M50 motorway. While recognising these lands as a potential strategic landbank for the County, it is acknowledged that the current infrastructural constraints on these lands require further detailed investigation that should inform any future decision to zone these lands for a mixed use urban district.

The NPF should not ignore the role that supporting settlements outside the metropolitan area (e.g. Rush, Lusk, Skerries, Balbriggan, Donabate (MUHDS), Baldoyle (MUHDS)) play in supporting Dublin City and ensuring the resilience of the Country as a whole. In this regard the final framework should recognise the important supportive role for Dublin that these settlements provide in terms of their ability to support a high quality of life in a sustainable environment with the offer of culture and heritage, access to the coast, waterways and city and airport access. The NPF should therefore promote sustainable forms of development for these areas, having regard to their unique metropolitan proximity and existing natural assets, thereby ensuring that existing established environments are not hindered in terms of enhancing job growth, economic progress and developing sense of place through improved vitality and viability of towns.

Urban and village centres provide the focus for a wide range of activities that contribute to a sense of place and the area’s sense of identity. These centres clearly have an important economic, social and cultural role to perform. The urban centres of Fingal have seen significant development over the years. The main priority is for consolidation in the existing centres and support of the existing

businesses and activities in order to maintain vibrancy. In the other major urban areas of Blanchardstown and Balbriggan, this includes developing sustainable residential communities both on land zoned for residential development and in mixed use areas. Objectives of the NPF should promote the use of appropriate residential densities dependant on location, the use of an appropriate variety and mix of good quality, well designed dwelling types and sizes, and the encouragement of infill and brownfield development to consolidate existing towns in preference to greenfield development. Likewise the importance of the rural villages, particularly in a County such as Fingal, must be recognised for the distinctive and valuable assets they are within the rural area.

There is a pressing need to facilitate a significant increase in housing output whilst creating high-quality accommodation to address a range of housing issues. In terms of spatial planning the overall objective in relation to housing is the creation of sustainable neighbourhoods “and maximise the contribution of the built environment to addressing climate change” (Rebuilding Ireland, 2016 p.9). In Fingal this translates into the consolidation of the existing communities, already served by public transport and close to established social and community infrastructure, and the creation of new communities serviced by high quality transport links.

Strategic thinking, partnership working and innovation are required to unlock funding for capacity enhancement. Housing requirements will continue to be at their most acute around Dublin – requiring targeted action to better match demand for land with physical and social infrastructure capacity. Fingal is ideally placed to accommodate this demand and to deliver successful and sustainable communities through the provision of infrastructure, adequate housing, open space, retail, leisure, employment, community and cultural development supporting the needs of residents, workers and visitors, whilst conserving our built and natural heritage.

4.0 A Place-Making Strategy

4.1 Our Capital, Cities and Towns

Taking the statistic on its face that the Dublin city region accounts for 40% of the national population and 49% of economic output gives rise to very real concerns that Dublin may indeed eat up Ireland (Melia, 2017). In doing this Dublin could quite possibly choke its competitiveness. Notwithstanding these concerns, the *Issues and Choices* position paper does acknowledge the reality of our small country situation in that: “If Dublin is underperforming, Ireland is underperforming” (4.1.7).

Dublin is the driver of the national economy, accounting for 43% of the gross value added in the country and providing employment for a catchment area that extends far beyond the geographical boundaries of the city region. In a country and economy of Ireland’s size, Dublin is the only city capable of competing for investment at an international level. Inward foreign direct investment is attracted because of the city’s strong reputation and track record. While balanced regional development is critical, efforts to direct investment to other areas of the country away from Dublin must not risk Ireland losing investment to our international competitors. Considering this, it is crucial that we do not constrain competitiveness on the supply-side in the Dublin region with the assumption that this will increase demand-side activity elsewhere in the country. Instead investment in infrastructure in Dublin and its periphery should be of high priority in order to capitalise on the competitive advantages that Dublin holds and to continue to disperse the fruits of the capital’s economic activity to other parts of the country.

What is critical then, to fully understand what challenges and opportunities this presents to us, is that the NPF embraces an all-Island approach. Importantly, as the *Issues and Choices* position paper

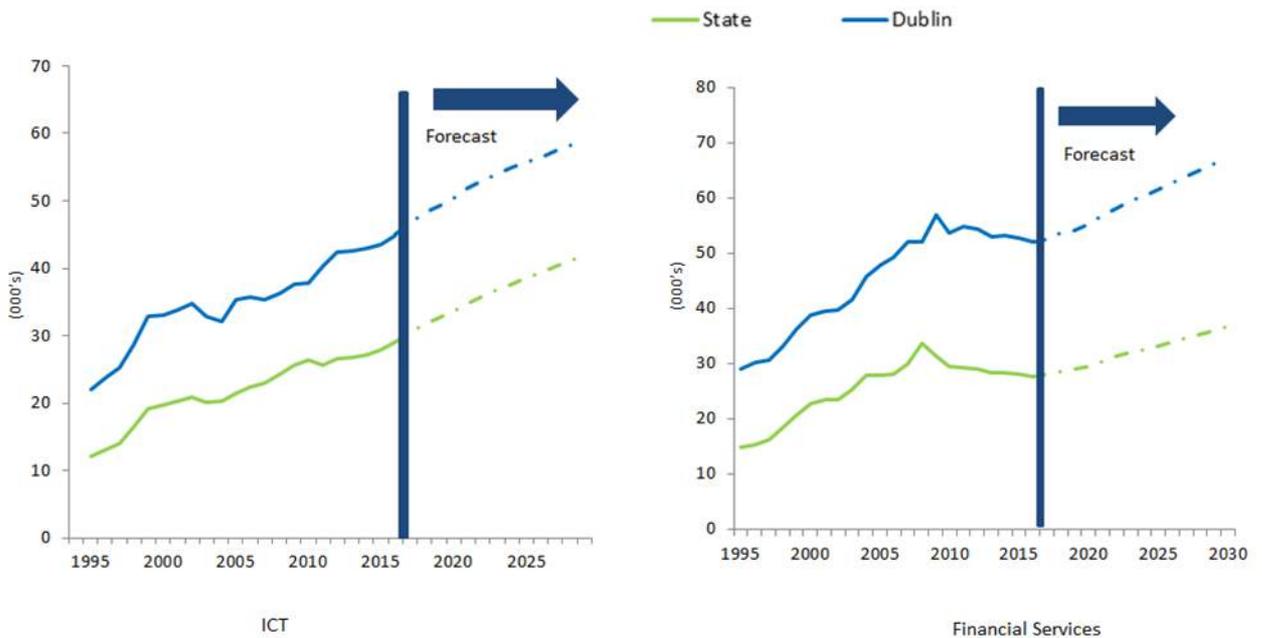
identifies, when assessing the Dublin city region alongside the other cities on the Island a more balanced picture emerges. The NPF should not lose sight of all-Island approach. As the objective of achieving more effective regional development elsewhere in Ireland, if prioritised to the detriment of the Dublin city region, could place in real jeopardy the competitiveness of Dublin and as direct consequence Ireland's competitiveness.

The NPF should ensure that the place making strategy, accepting and informed by the more balanced picture that emerges when taking an all-Island approach, prioritises the needs of the Capital to provide certainty within the uncertain context of Brexit. As a risk mitigation plan to try and limit the impact of Brexit the NPF should enable more joined up operations with the wider City region. To allow Dublin to continue to play its international role the NPF should take the lead on a transformation plan for city. Drawing inspiration from the past (Van Eesteren's *Algemene Uitbreidingsplan – AUP, General Plan for Expansion* in Amsterdam from 1934 in which the most important aim was to make people live close to their working place) and present approaches by comparative advanced countries (The Grand Paris Project in which they imagine a larger Paris with the creation of competitiveness clusters and put in place suitable transport, town planning and governance) there is an opportunity to plan the new urban expansion of Dublin through a series of connected conurbations to even out the disparity and realise a sustainable City region.

The question, as FCC advocate, is not if the County will be developed but how it will be developed sustainably and further integrated into the city and the city region. The new FDP sets out the strategy to support job creation, enterprise, tourism, housing, physical and social infrastructure, a healthy environment and sustainable communities. The long term development strategy for Swords envisages an emerging city with population growing up to 100,000. Swords, given its connectivity by air, national road network, proximity to Dublin Port Tunnel, rail and future new Metro is and will be the most connected metropolitan consolidation town, this presents a prime opportunity to address barriers (in areas such as housing, transport and infrastructural requirements) to Dublin's International competitiveness.

In addition to having the capacity to house and accommodate a growing population, Fingal is also particularly well placed to support high value employment. The global market is changing and Ireland now struggles to compete with low-cost countries for investment in the manufacturing sector. A shift has taken place from the more traditional manufacturing to high value sectors, and this has been particularly evident in Fingal.

Figure (2): Employment in high value sectors



Source: FCC analysis of Oxford Economics data

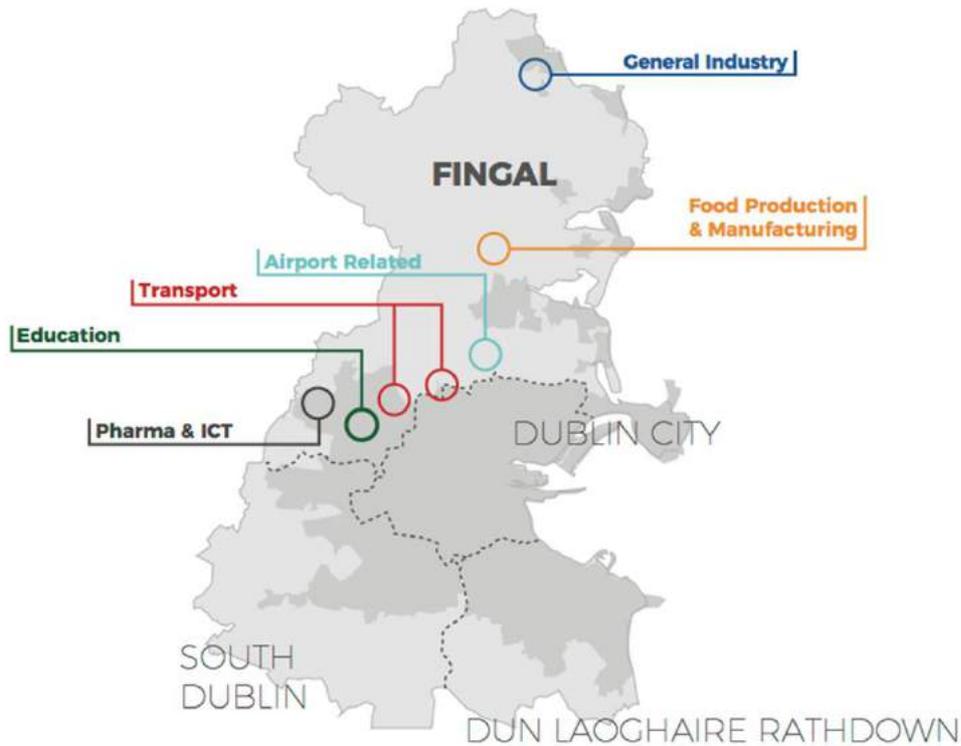
Figure (2) compares the growth in the ICT and financial services sector in Dublin to the rest of the country over the past 20 years and also their projected growth to 2030. It is clear from the forecasts that Dublin is, and will continue to be, crucial to the growth of the country and it is critically important that the NPF does not constrain Dublin's growth.

FCC agree with the methodologies employed in the position paper learning from other similar advanced small countries, namely Denmark, New Zealand, Scotland and Finland. Building upon the unique opportunity that Metro North will bring, to both Dublin City and Fingal County, FCC are proposing a scenario similar to that contained in the *Grand Paris Project* of a city region comprising a series of connected conurbations supported by clusters committed to sustainable economic development while rationalising, consolidating and containing urban unplanned expansion.

In Fingal clustering is being activity promoted, given that it is a central pillar of national enterprise policy, and currently has four thematic competitiveness clusters:

- ICT cluster in Blanchardstown
- Life sciences and pharmaceutical cluster in Swords and Blanchardstown/Mulhuddart
- Aviation cluster at Dublin Airport
- Agri-Food cluster principally to the north of the County

CLUSTERED GROWTH OPPORTUNITY AREAS FINGAL, 2017



Source: FCC Department of Economic, Enterprise and Tourism Development

4.2 Opportunities for our Regions

It is important to counter the 'Dublin v the rest of the Country' (4.2.10) discourse by innovative policy direction in the NPF. An Ireland with a strong Dublin city region does not imply that Dublin wins while the rest of the Country loses out. It is understood that the city region cannot grow at the expense of the surrounding areas but that it also must be acknowledged that the equalisation approach has not worked.

The NPF presents an opportunity to avoid development by incrementalism. As key influencer to the spatial outcomes for Ireland it should take into account a series of scenarios, proposed as ways of achieving a future vision, rather than scenarios devised in response to problems (or perceived problems). The NPF should not default to the high, medium, low scenarios. The proactive development of these scenarios in conjunction with the strategic environmental assessment (SEA) will help to identify more long-term sustainable alternatives to meet the forecasted future needs. FCC consider that strategic infrastructure, both already planned and projected future infrastructural needs, are the levers for effective regional development and the positioning of significant regional development should be guided by the location of same.

FCC supports the measured approach in the position paper to assess the unique attributes of place and to future plan how best to maximise the capabilities of the regions. Fingal's unique attributes of place are a combination of its diverse physical character, including both urban and rural areas, the coast, review valleys and upland areas, and a key characteristic is its social makeup having the youngest fastest growing population in the State with a diverse and highly educated population as it accommodates an expanding Dublin population.

The FDP actively encourages development in areas nearest to existing or planned public transport nodes. The Dublin Enterprise Zone, c. 1500 hectares and currently employs c. 20,000 people, located in Dublin 15 just north of the N2 is an example of such a development zone adjacent to the National road network. Lands at Dunsink also provide in the longer term strategic land bank for future opportunity for mixed use development. The aim of the FDP is to plan for and support the sustainable long-term development of Fingal as an integrated network of vibrant socially and economically successful hierarchy of high quality sustainable urban settlements and rural communities, strategic green belts and open countryside, supporting and contributing to the economic development of the County and of the Dublin city region.

4.3 The Potential of Rural Ireland

The development of Dublin city region does not need to be achieved at the 'cost' of the remainder of the region and Fingal's network of urban areas provides an alternative, albeit not at the same level, to the central urban area of Dublin in sustaining the city region as a whole. Taking inspiration from other countries around the world, in this case Amsterdam, the goal must be for concerted development, which offers advantages for the quality of life in areas that are more rural (PLANAmsterdam, 2013). The *Issues and Choices* paper identifies that key to harnessing rural potential is in the interactions between urban areas and their rural hinterlands.

The NPF should acknowledge the role of rural villages and clusters as an alternative housing offer; support the development of smaller towns and villages; and provide direction on one-off housing in rural areas. FCC has established policy to realise the rural potential and support the development of self-sustaining towns and villages through the facilitation of genuine rural generated housing need. FCC promotes the Rural Settlement Strategy as a sustainable pattern for rural settlement, which orders settlement within the villages, clusters and the open countryside encouraging the reuse and adaption of the existing building stock in preference to new build. Fingal's network of designated Rural Villages, including coastal communities, has the potential to develop as attractive, vibrant and resilient communities.

4.4 Ireland in an All-Island Context

FCC acknowledges the need to understand the role and function of settlements on the island north and south given that placemaking doesn't always follow boundaries on a map. How this will be impacted upon in spatial terms by Brexit is uncertain.

The Dublin-Belfast Economic Corridor spatial and economic concept is of particular relevance to Fingal. Given the potential of this corridor is further enhanced by the strong performance of the Belfast city region FCC suggest that successful cross border approaches to accelerate sustainable growth to enhance the performance of both these city regions is critical. At a strategic level, the Corridor concept provides the possibility of a series of development opportunities in towns along the M1 motorway and the Dublin-Belfast railway line subject to the requirements of proper planning and sustainable development, the settlement hierarchy and the provision of integrated transport hubs. In the context of the potential negative impacts of Brexit, the NPF should seize the opportunity to provide a strong policy framework around the potential of the Dublin-Belfast Economic Corridor, identifying necessary connectivity improvements, infrastructure and potential synergies to support the development potential of this economic corridor.

4.5 Integrated Land and Marine Development

The marine sector of Fingal's economy is diverse. It comprises activities related to traditional fishing and food production, such as fish and fish processing and preserving, and fish, crustaceans and molluscs retailing and wholesale distribution (Howth and Balbriggan performing strongly, Bord lascaigh Mhara (BIM) 2013). The sector also includes activities associated with the building, repair and maintenance of fishing craft and marine equipment, water transport services, and water-based recreational and educational services (Malahide and Donabate). There are some in-land marine enterprises including wholesale distribution, including Swords, Lusk, Rathbeale and Garristown. The infrastructure such as marinas, fishing ports and harbour facilities are important economic assets to the Country. The NPF should support the existing diverse nature of the marine sector in Fingal and identify and promote sustainable growth opportunities. This is reaffirmed in FCCs prioritising marine infrastructure as a strategic project in Fingal to be identified in the NPF (see section 6.0).

5.0 Ireland's Unique Environment – Sustainability

5.1 Development and Land Use Change

Our present lifestyle, in particular our patterns of division of labour and functions, land-use, transport, industrial production, agriculture, consumption, and leisure activities, and hence our standard of living, make us essentially responsible for many environmental problems humankind is facing.

The sustainable growth of the country is dependent on the provision of services and infrastructure. A Plan led approach is required for the delivery of such services in order to ensure there is adequate capacity to support the future development of the country. FCC is a key player in the process of changing lifestyles, production, consumption and spatial patterns. The Council has integrated the principles of sustainability through the FDP and this will inform all actions of the Council for that period.

Central to the FDP is the development of sustainable communities, where communities are able to evolve and the needs of today can be facilitated without compromising the ability of future generations to meet their own needs. Placemaking is a multi-faceted approach to the planning, design and management of new development and public spaces. It is fundamentally about responding to the context of a place, through the understanding of its evolution and history, its functionality, its impacts on those living and working there as well as how it interacts with the environment. Access to public transport, education, community facilities, leisure, retail, health services and jobs are as important as the aesthetic of a place.

Unsustainable land use change can affect human health and have a harmful effect on water, air, soils and/or biodiversity, especially when combined with poorly managed responses to development. Fingal has long sought to protect our environment, recognising it is a dynamic resource rather than a fixed asset. A planned approach to development will help strike the right balance between safeguarding assets which are irreplaceable, and facilitating change in a sustainable way. The NPF should emphasise that land use can deliver multiple benefits, and encourage better use of assets to support primary activities including food production, flood management and carbon storage.

5.2 Climate Action

Climate Action and Change is one of the cross-cutting themes of the FDP. We recognise that climate change is an over-riding challenge facing us locally and nationally arising from the global challenge of climate change. The EU and Ireland has already committed to mitigation policies which are designed to reduce carbon emissions and include regulations on matters such as car efficiency and building regulations. In addressing and responding to this challenge, the NPF will be required to both adapt to and mitigate for climate change by reducing emissions and unsustainable energy consumption.

It is recognised that the nature of Fingal's economy, settlement patterns, infrastructure (including roads, electricity networks, water supply and sewer systems), physical geography (e.g. total area, extensive coastline and rivers) and mix of land use (e.g. horticulture and urban/ suburban) presents a unique set of challenges in the response to climate change. The Council through proper planning, promoting sustainable development, will work towards reducing greenhouse gas emissions. The FDP contains provisions dealing with climate change mitigation and adaptation throughout the Plan, in areas such as flood risk management, transportation, surface water, waste management, water services, urban design, energy, natural heritage and green infrastructure.

Fingal is working closely with Codema (Dublin's Energy Agency) and the 3 Dublin Local Authorities, who will act in unison and will work with all relevant stakeholders in order to deliver an inclusive and interconnected Climate Change Mitigation Action Plan. Internationally, Fingal will liaise closely with the Covenant of Mayors and has recently become one of the international signatories (alongside the other Dublin Local Authorities). Fingal supports the international cooperation of Local Authorities facing the challenge of climate change mitigation and adaptation.

Furthermore, the *Greater Dublin Strategic Drainage Study (GSDSDS)* developed a Climate Change Policy to assist in the future provision and management of drainage services in the region. This is to facilitate a uniform and consistent approach to urban drainage infrastructure planning, design, construction and operation.

5.3 Re-Energising Ireland

Good planning and design also offers opportunities to reduce our use of natural resources by promoting renewable sources of energy. While the current Building Regulations set out standards and deal with issues such as building standards, workmanship, conservation of fuel and energy, and access for people with disabilities, there are other issues which can be addressed through good planning and urban design, i.e. the design and arrangement of buildings can result in the creation of a microclimate, influencing the effects of temperature, sunlight and wind movement. Certain orientations and design can enhance comfort on exposed sites and maximise the potential of daylight and solar gain.

The FDP seeks to ensure adequate power capacity for the future needs of the County by co-operating and liaising with statutory and other energy providers, facilitating the development of enhanced sustainable energy supplies, encouraging in particular renewable energy sources and energy efficiency.

Incorporating energy efficiency into design and construction and where possible alternative energy technologies such as bio-energy, solar energy, heat pumps, heat recovery and wind energy should be encouraged by the NPF. Fingal County Council, through the FDP seeks to ensure all new developments contribute positively towards reducing energy consumption and the associated carbon

footprint. We continue to promote and facilitate new and innovative technologies seeking to provide renewable energies. The Council will also ensure a balance is achieved between the development of renewable energy sources and the protection of the natural heritage, visual amenity, biodiversity and food producing lands.

5.4 Heritage and Landscape

The County's natural and cultural heritage is part of our identity, part of the distinctive character, vibrancy and attractiveness of where we come from or the places we live and work in and plays a significant role in drawing visitors to the area. All aspects of our natural and cultural heritage come together in the landscape and give us a strong sense of place. FCC is dedicated to protecting, conserving and presenting the County's rich cultural and natural heritage while promoting sustainable economic development and enrichment of the environment.

The unique attributes of place (natural, cultural and built heritage) in Fingal also significantly contribute to the tourism appeal. Using the tourism collaborative strategies, for example, *Dublin: A Breath of Fresh Air* and *Ireland's Ancient East*, the NPF should identify the key assets; attractions; and activities that can be further developed. Building on the recognition within the issues paper of the economic potential of tourism as a source for economic development, both in terms of attracting visitors (overseas and domestic) and providing job opportunities, it is considered necessary for the NPF to address the role that Dublin city region can plan as a gateway for tourism. Recognising the increased competition between cities in Europe, it is important that the NPF supports the effective marketing of Dublin not only as a Capital City with a rich cultural tourism product but also as a unique city destination side by side with the adventure offer of the natural outdoors.

The challenge we face, and one that the NPF should address is how best to manage our landscapes so that change is positive, and that landscapes which we value are protected and those which have been degraded are enhanced.

5.5 Green Infrastructure and Biodiversity

Natural heritage is also a core component of Fingal's Green Infrastructure (GI). The Council's approach to GI is one that seeks to conserve and enhance biodiversity and geological heritage and to promote the sustainable management of the landscape and coast. Green infrastructure needs to be protected, managed and created at a range of spatial scales. At county level the FDP provides a robust policy framework for the creation of an integrated and coherent green infrastructure for the county by requiring the retention of substantial networks of green and blue space in urban, urban fringe and countryside areas to serve the needs of communities now and in the future including the need to adapt to climate change. At a local level FCC has been to the fore in developing innovative local area plans which integrate planning for green infrastructure with the plan-making process. For example, the Portmarnock South LAP not only provides for a substantial quantum of development it also protects the environment, including two internationally important sites for biodiversity, and utilises landscape assets in a positive manner to enhance the plan and deliver benefits for citizens. The NPF should ensure that these approaches underpin all County Development Plans and Local Area Plans so that planning for the environment is proactively integrated in all future land-use plans thus bringing greater environmental coherence to the planning system.

There is an on-going need to provide for investment in the protection, management, creation and development of green infrastructure. It is increasingly being recognised that such investment should be viewed as a part of the need to invest in critical infrastructure for society given the wide ranging

economic and social benefits that accrue from such investment¹. The NPF should support and facilitate investment in green infrastructure by local authorities as a vital resource for the future.

6.0 Equipping Ireland for Future Development – Infrastructure

6.1 Setting the Bar

In providing spatial clarity and co-ordination the role that Dublin plays as a European Capital City and principal provider of social, cultural and economic functions of the state should be acknowledged and considered as an opportunity in the NPF. The NPF should support the fostering of Dublin's role as a global city which acts as a realistic alternative to other European cities. In this regard the future role that Dublin plays in the Eastern part of the Country should not only be protected but should also be enhanced with a focus on key infrastructure provision to support housing, economic development, social and cultural improvement and improved access and movement.

In evaluating national policy and how investment will be prioritised over the coming twenty years, it is important that a holistic view is taken. In doing so, both the demand and supply side need to be taken into account in establishing what will be unlocked by investment and it should not be assumed that the same infrastructural investment will induce the same level of demand side activity, regardless of location. In Dublin, where demand will remain strongest, additional supply-side capacity will have the greatest impact. Put another way, an additional €1 of investment in Dublin can have a far greater economic impact than elsewhere.

FCC recognise the broad scope of infrastructure identified in the NPF including what would traditionally be considered infrastructure such as transport, waste, energy but also extending consideration to the facilities for people in the form of schools, healthcare and housing. Given the highly accessible location of Fingal in combination with strategic land banks the NPF should recognise the lands available to provide the necessary social infrastructure, such as education, sports and health (potential of Connolly Hospital) to support the development of Dublin city region and ensure infrastructural spending efficiency.

The NPF should acknowledge that our strategic national transport infrastructure plays an important role, not only a role in terms of movement but also as an economic facilitator for the country. In this regard, there is a need to solidify transport investment for key strategic national assets in addition to establish plans for their future development and relationship to land use in strategic circumstances.

FCC is advocating three significant strategic projects to be nationally identified in the NPF against which investment decisions can be prioritised, the first of which is Dublin Airport: - **Dublin Airport** plays a national gateway role as a key strategic employment location with a gravitation pull for many international and high tech companies looking to base themselves in Ireland or more widely within the EU. Consideration of uncertainty surrounding Brexit, particularly in terms of Dublin Airport's national gateway role and as a key strategic employment location, should be identified in the NPF with a clear statement as to the envisioned role of Dublin Airport in the future development of the Country, with acknowledgement of infrastructural upgrades and more effective integration of infrastructure necessary to achieve this vision (e.g. Metro North and road/motorway upgrades).

¹ The Guide to Multi-Benefit Cohesion Policy Investments in Nature and Green Infrastructure. European Union, 2013

The **Metro, Dublin Airport, Swords (Metro Economic) corridor** provides for agglomeration economies, spill over effects, pooling of skilled labour and housing provision at a very important strategic location within the Dublin city region, adjacent to the Dublin-Belfast Economic Corridor and for the Irish economy. FCC proposes this strategic infrastructural zone as the second strategic project critical to delivering on the vision for Ireland 2040. Ensuring that high skilled employment opportunities and housing choices are provided for existing residents, and for the projected increased population, in this area is crucial to the future development of Dublin city region. The development of this infrastructural zone must be fully integrated with the existing infrastructural provision, such as the Dublin-Belfast railway line, aligning and promoting effective sustainable land use around this critical infrastructure. FCC recommends the inclusion of innovative policy initiatives are included in the NPF to enable the sustainable economic development of Metro North and to ensure the maximum social, environmental and economic benefits are derived from the major infrastructural investment.

Thirdly, FCC put forward **Marine Sector Infrastructure** in Fingal as strategically important given its zone of influence extends far beyond the County boundary (see also section 4.5). There is potential to support the existing diverse marine sector, for example, in Howth which is one of the six Fishery Harbour Centres but also is a key tourist designation. Great potential exists in identifying and promoting sustainable growth opportunities.

7.0 Conclusions

In conclusion, we reiterate that the success of the NPF is contingent on its recognition of the reality of our small country situation that “If Dublin is under performing, Ireland is underperforming”. FCC advocate that through prioritising uniqueness of place, protecting Dublin city region, unlocking Fingal and developing sense of place in towns and attractiveness of rural villages the NPF could facilitate steps to making Ireland the best country it can be, and (paraphrasing Minister Coveney) allow for the right development, in the right places, at the right time.

We thank you for this opportunity to contribute to the debate, strongly advocate innovative NPF policies to make Ireland 2040 **a place with the ability to guarantee quality of life**, and are very much looking forward to further opportunities to input into the drafting of the NPF.

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