

An Rannóg Pleanála agus Nuála Eagraíochta  
Planning and Organisational Innovation Department  
**Mary Henchy, Director of Services**  
Marine Road, Dun Laoghaire, Co. Dublin  
Email: [REDACTED]

Fax: 280 3122  
Tel: [REDACTED]

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

**Re: National Planning Framework – Issues & Choices Document**

Dear Sir or Madam,

Dún Laoghaire-Rathdown County Council welcomes the opportunity to make preliminary comments on the recently published NPF Issues & Choices document. It is acknowledged from the outset that the document is very much focused on 'high level' issues and its function and purpose is primarily to generate and prompt national debate and discussion on how the State might develop and evolve over the next twenty years or so.

The timing of the new National Planning Framework is particularly opportune given that the Country is now showing signs of robust and sustained economic growth and recovery after an extended period of retrenchment and recession triggered by the events of 2008.

The anticipated population growth and the changing demographics of the State in twenty years' time (an aging population, smaller household sizes etc) – so graphically set out in Section 2 of the document – is particularly compelling and highlights the magnitude of the future task of accommodating an additional 750,000 citizens in a considered and spatially sustainable fashion.

As a Dublin local authority, Dún Laoghaire-Rathdown very much welcomes the recognition afforded in Section 4 to the metropolitan Dublin area as the national driver of growth. Uniquely in Ireland, metropolitan Dublin alone has the scale and critical mass to compete on an international stage – particularly in relation to issues such as FDI. That being the case, it could be construed as a retrograde step if the continuing sustainable growth of the Dublin area was to be no longer supported by further appropriate levels of targeted strategic investment in water, waste water treatment and public transport infrastructure by State agencies' such as Irish Water (IW), the National Transport Authority (NTA) and Transport Infrastructure Ireland (TII). While a more 'dispersed' and fragmented infrastructure investment policy might prove beneficial in assisting a more balanced Regional development 'picture' across the State, it is important that the key role and critical mass of Dublin, as the national 'engine room' of economic growth, is not undermined but is, rather, protected, sustained and supported.

Section 2 of the document highlights the growing disconnect between the factors influencing settlement dispersal outside the larger metropolitan core areas – driven in



part by the accessibility afforded by the modern motorway network that increases accessibility – and the increasing concentration of employment/jobs located close to the larger pools of labour which are largely focused on the urban hierarchy of cities and larger towns. Reconciling these increasingly divergent patterns – particularly so given the metropolitan 'doughnut phenomenon' (evident principally in Dublin but also, to a lesser extent, in the four other 'regional' cities) will prove challenging. In this regard Dún Laoghaire–Rathdown would be fully supportive of any national spatial imperatives or policies targeted at preventing further ill-considered greenfield sprawl – particularly in (i) the hinterlands surrounding the five key metropolitan areas of the country and (ii) on the fringes of larger towns of scale and possessing radial access corridors.

As a counterpoint to the above this authority believes that the metropolitan Dublin area still has significant residual spatial capacity to support further population and employment growth – primarily through the mechanisms of appropriate sustainable infill and targeted redevelopment. This will, however, require a more open and mature debate in relation to the often contentious issues of density, building height, carparking and unit size (In response to the trend of ever declining household size). The destination is as critical as the origin and therefore the location and density of employment (jobs per ha) should be given similar consideration to residential development.

To assist this process (particularly in the Dublin context) and to create a greater and more precise degree of differentiation between 'urban' and 'rural', it might be beneficial if the NPF – or, indeed, the pending EMRA Regional Spatial and Economic Strategy – were to identify a more robust and definitive boundary between the Metropolitan 'core' and the surrounding hinterland - to be 'backed up' by appropriate national policy responses to ensure growth is targeted and prioritised to the former over the latter. To this end a clear definition of the role, function and vision for the Dublin Metropolitan Area would assist in providing clarity on the role of tier two and tier three cities. The hierarchy of cities should be seen less as a competition and more as complementary in their roles and functions.

In the same vein national spatial policy in relation to urban-generated development in the hinterland of the major metropolitan areas and larger towns across the Country – usually as 'one-off single houses' - needs a 'root and branch' review to stem and reverse a patently unsustainable pattern of development that simply perpetuates car dependence and is highly inefficient both in terms of services and infrastructure provision.

Dún Laoghaire–Rathdown will await with interest the outcome of this Initial Consultation in relation to Ireland 2040 and the subsequent publication of, what will undoubtedly be, a more substantive and comprehensive Draft NPF. The advised timeline for the publication of this Draft NPF is highly ambitious but the delivery of a new strategic document to help guide the spatial and economic development of the Country over the next 20 years – with statutory backing approved by the Oireachtas and underpinned by objective, targeted and prioritised infrastructure investment – is long overdue.

Should you have any queries regarding any aspect of this submission or require further clarification on the issues raised please do not hesitate to contact me. Attached are responses to questions raised in the issues paper.

Yours sincerely,

  
Mary Henchy  
Director of Planning and Organisational Innovation

"Business as usual" would not be an appropriate target for the National Planning Framework. To assist in framing the draft plan, set out below, are response to some of the questions raised in the issues paper.

### **People's Health and Well-Being**

What policies can the NPF include to effect improvement to our general health, including physical and mental wellbeing, in Ireland over the next twenty years?

THE NPF should stress the importance of a strong policy of "place making" and "place reinforcement". The importance of developing plans that create and support environments that encourage engagement, interaction and enhance people's lives is critically important.

### **A Place Making Strategy**

#### **Our Capital, Cities and Towns**

What role should our cities have as part of the NPF?

It is critical that Dublin's role as a key economic driver for the state is emphasised by the NPF. Dublin's established reputation and capacity, to compete in a global market for foreign direct investment should be highlighted by the NPF, particularly at this time of economic uncertainty with changes in Europe.

The sustainable growth of the Dublin Metropolitan area is critical to the growth of the hierarchy of cities across the Region's. Focused investment is required to maintain the growth of the Dublin Metropolitan area. A clear definition of the role, function, boundary and vision for the Dublin Metropolitan Area would assist in providing clarity on the role of tier two and tier three cities. The hierarchy of cities should be seen less as a competition and more as complementary in their roles and functions.

The destination is as key as the origin of the journey to ensure compact non car dependent economic growth within the metropolitan areas the density of jobs per ha could be considered as a measure in the NPF, as should the connectivity of site to networked transport corridors.

#### **Opportunities for our Regions**

Are there strategic issues (i) across local authority boundaries or (ii) on an inter- regional basis, that the Regional Assembly can co-ordinate to ensure more effective sub-regional and regional outcomes?

- The Dublin Metropolitan Area spans a number of Local Authorities, the issue of loss of population in the metropolitan area creating a "donut" effect is an issue that requires regional policy and inter regional direction to curb and reverse. But, regional policy alone

will not be enough this will have to be supported by an alignment of national fiscal policies and a national review on common themes on the reasons why the hearts of towns, cities and the metropolitan areas are not key focal points for growth.

- Maritime planning – the coastline is a national resource and does not respect County Boundaries, or Regional boundaries. The potential interaction between Maritime Spatial Planning and land use planning should be highlighted and at a strategic level the key issues addressed and aligned to the national capital spending programme.

### **Rural Urban Interdependence**

How can rural parts of Ireland close to urban areas be protected from development pressures that are likely to arise to accommodate further population growth?

- Consideration could be given to a specific zoning of these lands common to all local authorities. Areas subject to this specific zoning objective could be subject to a different review timeframe to the County Development Plan's having instead the timeframe of Regional Spatial and Economic Strategies.

### **Ireland's Unique Environment – Sustainability**

How do we plan for growth in such a way that supports a transition to a low carbon and climate resilient economy and what planning policy measurements are needed to achieve this?

A number of actions that may contribute to a low carbon and climate resilient economy have been referenced above including:

- Achieving appropriate densities of development both residential and employment
- Place making, and place reinforcement to support active living
- Networking and connectivity

### **Equipping Ireland for Future Development - Infrastructure**

What are the nationally important infrastructure projects for Ireland that require delivery over the next twenty years?

The Dublin Metropolitan Area needs a secure water supply.

What do we need to do to make best use of existing infrastructure?

We need to ensure that the carrying capacity of serviced land is fully utilised.