

Land Use Planning and Transportation Department
An Rannóg Talamhúsáide, Pleanála agus Iompair

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

14th March 2017

Re: Submission on 'Ireland 2040 – Our Plan'

Dear Sir or Madam,

South Dublin County Council (SDCC) is pleased to contribute to the preparation of the *"Ireland 2040 – Our Plan"* National Planning Framework (NPF). SDCC's submission is concerned with the future sustainable development of SDCC as of part of the Dublin City region. Dublin is a city of international scale whose future development growth is dependent upon continuing to compete on a global level for inward investment. However, the manner of this development has significant implications for Ireland as a whole in terms of environmental sustainability, cohesive communities and resource management. The preparation of the NPF is an opportunity to harness the dynamism of the City region growth and direct this in a sustainable fashion. This will require an appropriate hierarchy of spatial and sectoral plans with the ability to implement their delivery in an integrated and timely fashion.

SDCC is situated within the Metropolitan Area of the Greater Dublin Area (GDA). SDCC has a key role in coordinating and creating the conditions for the robust spatial delivery of sustainable land use and transportation measures. The current *"South Dublin County Council Development Plan 2016-2022"* (the Development Plan) is the key planning instrument in this regard. The Development Plan is underpinned by a number of strategic considerations which are also relevant to the NPF:

- (a) Quality of life, with an emphasis on key economic, environmental, social and cultural indicators;
- (b) Prosperity, with an emphasis on contributing to a competitive business environment that supports economic development, job creation and prosperity for all;
- (c) Sustainability, with an emphasis on making better use of key resources such as land, buildings, water, energy, waste and transport infrastructure;
- (d) Health and wellbeing, by facilitating active and healthy lifestyles with increased opportunities for walking, cycling and active sport and recreation;
- (e) Social inclusion, with an emphasis on creating socially and physically inclusive neighbourhoods; and
- (f) Climate change adaptation, with increased emphasis on reducing climate change at a local level through settlement and travel patterns, energy use and protection of green infrastructure.

SDCC submission is based on the *"10 Key Questions for the National Planning Framework"* as identified in the consultation literature released as part of this phase of the preparation of the NPF. Each of the questions is addressed in detail below.

1. What Should Ireland Look Like in 20 years?

In 20 years Ireland should be a modern European democracy which has developed in an environmentally sound manner, where the intrinsic value of built and natural heritage is recognised, valued and protected, which is economically resilient and socially just.

There should be an increased focus on maximising the use of existing resources and on energy efficiency. The issue of climate change is becoming more pressing and spatial planning through the NPF can contribute to addressing this. As part of its contribution to climate change adaptation SDCC has become a leader in the integration of spatial planning and climate change mitigation. In 2015 SDCC completed a countywide Spatial Energy Demand Analysis. On foot of this, the City of Dublin Energy Management Agency (CODEMA) has now undertaken mapping for the full Dublin county area. In 2016 SDCC prepared an energy masterplan for the Clonburris SDZ which is currently being updated for the revised Planning Scheme. SDCC is currently piloting a district heating feasibility study for Tallaght.

2. How do we ensure that Dublin can realise its potential?

Dublin can realise its potential through managed spatial development which is focussed on urban consolidation. SDCC is playing its part in this regard. The Development Plan contains a robust policy position to sustainably manage development and change through encouraging the consolidation of SDCC's metropolitan area and protection of its rural hinterland. In the future, Dublin should look like a compact city, where land use and transport are fully integrated, where people can live, be educated, recreate and socialise close to where they work and where the natural amenities and biodiversity which contribute to the quality of the environment are enhanced, rather than threatened, by growth. Within twenty years, cross cutting strategic infrastructure must be provided to enable this. In SDCC, this includes the rail interconnector, core bus corridors and the Irish Water capital programme. SDCC has a key role in the delivery of housing in the GDA. Crucially, this can be done sustainably through the development of lands which are already serviced by public transport.

Realising the potential of Dublin requires strong spatial policies backed up with effective means of implementing those policies which are innovative and plan for growth. Promoting the consolidation of Dublin requires that the development of infill lands close to public transport and the active redevelopment of brownfield lands. There is potential in Dublin for the development of lands that will maximise existing public transport infrastructure and in turn relieve pressure on the road network, be more environmentally sustainable, contribute to reducing transport emissions and protecting the rural hinterland of the city.

There needs to be a coordinated approach to implementing the NPF which is integrated into other Government departmental work programmes and policy development. This must be delivered by all tiers of the planning hierarchy particularly at regional assembly level through the regional spatial and economic strategies (RSES) and local government level through development plans and local areas plans.

Metrics must be used to monitor and gauge success of the NPF. Thus, the NPF needs to contain SMART (specific/measurable/agreed/realistic/time based) objectives in relation to the built and natural environment. Prioritisation of areas for development is critical. The use of the sequential approach for all forms of development with investment in enabling infrastructure is fundamental to achieving this.

Dublin's potential can be realised by placing an appropriate emphasis on place making including protection and enhancement of archaeological and architectural heritage. By emphasising the cultural identity of Dublin and placing value on it, it will help differentiate Dublin from other international competing cities. This approach is critical in promoting the tourism offer of the GDA.

To ensure that Dublin realises its potential, local government must be recognised and empowered as the primary agent for implementation and delivery of local plans and objectives. This approach builds on local knowledge, expertise and understanding of the context in which plans are prepared, interpreted and delivered. This should be recognised in the funding available for plan making, active land management and implementation.

3. Where will jobs be located and what kind of jobs will they be?

Dublin will continue to be the largest employment centre nationally and compete on a global scale for inward investment and employment opportunities. This is likely to be in the form of skilled jobs which require a highly educated workforce focusing on STEM (science/technology/engineering/maths) and hi-tech based industries. Dublin is also a tertiary centre for health and government services, a significant tourism centre and a service centre for its resident population. Thus there will continue to be wide variety and range of employment provided within Dublin.

The emergence of economic clusters has been observed and should continue to be encouraged in order to maximise synergistic effects. This approach should be coordinated and supported at a regional and local government level. It is important that the planning system contributes to creating the conditions to attract economic development to suitable areas which are already serviced and which can maximise the use of existing resources. It is important that land use and transport integration is promoted in economic development in which people intensive industries is directed in the first instance to locations which are served by public transport. The jobs of the future need to be located close to residential areas to reduce the need to travel.

In SDCC, the Grange Castle Business Park is a strategic employment site in close proximity to existing major residential areas and two Strategic Development Zones (SDZs), Adamstown and Clonburris, where significant new residential development will be provided. A zoning for regeneration use has been introduced in the Development Plan to support and facilitate the regeneration of underutilised industrial lands that are proximate to town centres and/or public transport nodes for more intensive enterprise and residential led development. This includes a significant area of land adjoining Tallaght town centre which already benefits from a clustering of employment through local government (SDCC), health (Tallaght Hospital), third level education (Institute of Technology Tallaght) and retail/business services. These lands have particular potential for an intensification of commercial and residential uses to build on the existing cluster and availability of the public transport (LUAS/bus). Through these areas, SDCC is making, and can continue to make, a strategic contribution to sustainable enterprise location in Dublin.

Tourism is an important employer and this sector needs to make best use of the assets of the area, in accordance with the recommendations of the *Grow Dublin Taskforce* Report, in order to diversify the tourism offering and encourage a broad range of visitors. For example, recently, SDCC have completed a feasibility study and implementation plan and commenced planning to provide enhanced visitor facilities in the Dublin Mountains to serve as a gateway to its heritage and recreation amenities. In

conjunction with Fingal County Council plans are being advanced for the development of a Liffey Blueway.

The Development Plan's Core Strategy represents a clear and evidence based approach to the zoning and prioritisation of residential zoned land. There needs to be an evidence based approach for the location of commercial/industrial land uses at regional and local government level. Employment locations have a major impact on urban form, travel patterns, and quality of life. To ensure the effective prioritisation of resources, limit demands for servicing and infrastructure in inappropriate locations and prevent negative impacts on the ability to achieve targets in respect of mobility, a sequential approach to employment zoned lands should be taken. The sequential approach would also counter the 'donut' trend of hollowing out of commercial operations from town/city centres to suburban locations, removed from public transport.

4. Where will we live and what types of housing will be needed?

People should be able to access affordable dwellings within easy access of work, schools, retail, recreational and other essential services and facilities. To enable this two options must be pursued: (a) infill/brownfield development which can maximise existing services and facilities whilst protect existing built form; and (b), development of new mixed use areas in a comprehensive and integrated fashion. The pressure for individual housing in rural areas must be addressed in a clear and balanced manner. Future rural population growth should be targeted at existing towns and villages in order to ensure that the consolidation of urban areas is not undermined and to minimise unsustainable commuting patterns.

Housing typologies must recognise the variety in household types and size required for life cycle based housing solutions informed by the principals of universal design. This must be reflected regardless of the delivery agent (i.e. public, private or voluntary housing sector). Tenure mix should be promoted and the architectural quality of social/public housing should be indistinguishable from private housing. The location of housing strongly interacts with other challenges for SDCC such as climate change and the need to reduce transport emissions. Within the context of Dublin, it is vital that future housing is located close to employment and services to reduce the need to travel and promotes the use of public transport, walking and cycling. The more widespread provision of live/work units would also make a contribution towards reducing travel needs.

Future demographic change indicates an ageing population, with life expectancy increasing. It is important that there is a viable housing choice for an older population with options available for people to relocate to housing within their own community or to adapt existing housing which will make more efficient use of the building stock. This will require a much greater mix of dwelling size, particularly with smaller size units, than is currently being provided. It should be noted that this would also address the changing nature of household size, which is decreasing.

Housing needs to be at an appropriate density. Land is a scarce resource. The servicing of land requires significant investment. Inappropriate density mitigates against public transport, walking and cycling and impacts on overall health and well-being. A clear policy in respect of density should be included in the NPF to provide for higher densities in an urban context.

There is a need to review the role of housing strategies. In particular the potential for a more strategic and regional form of housing strategy needs to be explored. This approach would look more fundamentally at the issue of demographics, population projections, future housing needs, potential yields and the distribution of future stock. Housing needs should be met in the area in which they arise and, in the context of Dublin, this can be more effectively addressed and coordinated at a regional scale.

5. What are the key services that people will need?

A lifelong approach should be taken when assessing the demand for key services. A balanced community will make provision for the needs of all its members ranging from childcare facilities, schools, social, sports, leisure/recreational amenities, retail, employment, housing and health. It is important to use available demographic information early in the plan making stage to effectively inform the delivery of necessary services. Land use patterns can influence accessibility to key services. Infill/brownfield sites will benefit from proximity to existing services while large scale development areas must promote mixed use development. It will be important to promote a shared use of facilities to maximise the return on investments. Community buildings need to be designed to be multi-purpose. The layout of school buildings should facilitate the use of sporting facilities by community groups/organisations.

6. Where will South Dublin fit in a wider (geographical) context?

SDCC will continue to play a key role as an employment/retail/service hub within the context of the Dublin and Mid East Regions. The integration of land use and transport infrastructure in SDCC is critical to the consolidation of Dublin. Dublin is competing on a global stage and it is necessary that employment policy is robust, visionary and will ensure that employment needs can be met in appropriate locations. SDCC has successfully used the SDZ model to deliver quality residential development. The Adamstown and Clonburris SDZs, utilise the existing rail network and new stations to serve the communities have been constructed. This facilitates a move away from car based traffic movements in the Dublin region, however the Objective contained in SDCC's County Development Plan "To Support the delivery of sufficient public transport and road capacity to facilitate sustainable development in Strategic Development Zones" needs to be funded and supported by relevant State Agencies. The SDZ also benefit from proximity to employment centres at Grange Castle and Citywest and the amenities of the Grand Canal and local facilities such as Corkagh Park. Thus new development can benefit from existing facilities in the area. These areas have the ability to integrate housing and infrastructure delivery with projected population growth. Lands identified for regeneration purposes in Tallaght which are adjacent to the LUAS line also have potential for more intensive employment and residential use enabling the continued growth of the town in a compact manner.

SDCC is a large employment/retail/service hub with a large catchment located in the hinterland of the Dublin and Mid East region. SDCC provides high quality business park settings close to residential areas and supports the redevelopment of underutilised, existing industrial areas. There is potential for increased employment floor space in SDCC using these approaches.

7. What are the planning responses to key environmental challenges?

A key planning response will be maximising the benefit of existing areas and infrastructure. In terms of transport, the focus must be on reducing trips by private vehicles, increasing the level of walking and cycling by ensuring that road capacity is available for public transport and for strategic journeys.

SDCC benefits from having key elements of the national motorway network traversing the county (i.e. N4, N7, N81 and M50). These routes serve Dublin and the rest of Ireland and are critical to the economic fortunes of the capital and country. It is important that future traffic on these roads is managed to ensure that potential strategic developments are not compromised by local traffic movements. This will involve a comprehensive approach involving traffic management measures and investment in public transport to discourage commuting by car, mobility management for future development and sustainable land use patterns in areas adjoining the GDA.

Responding to climate change is a key challenge. The NPF needs to be flexible and robust to meet changing demands in this area. This should be addressed by ensuring that flood risk is managed, that surface water management measures are effective, that the need to travel is minimised, that modal shift to sustainable transport measures occurs, and that energy efficiency is promoted at all levels in the built environment. SDCC SEDA which was conducted in partnership with CODEMA has the potential for widespread application and should be promoted and encouraged more extensively.

Energy efficiency and the role of renewable energy in meeting energy needs is growing more urgent. Investment in this area needs to be supported. The NPF needs to set a clear spatial direction to identify suitable locations and maximise the potential for renewable energy (e.g. wind/wave energy along the western seaboard). The Development Plan has identified a range of renewable energy options and has worked to spatially identify where solar energy, wind energy and small scale hydro-electricity projects may be suitable.

Waste management is likely to be a challenge in light of the forecasted population growth. It is important that resource management and waste minimisation are promoted.

Green infrastructure can be actively managed through spatial planning instruments. The NPF and the RSES can play an active role in in this regard. Green infrastructure is a key driver and consideration of the Development Plan. The advantages of a sustainable and integrated approach to green infrastructure management in both urban and rural areas are wide reaching and are proven to include: (a) Improved habitats for wildlife; (b) Cleaner air and water; (c) Improved surface water management; (d) 'Greener' and more attractive urban areas; (e) Tourism and recreational opportunities; and, (f) Improved human health and wellbeing.

8. What infrastructure is required – what are the national priorities?

The latest European Commission 'Country Report Ireland' (2017) notes that investment is required in public transport infrastructure in Dublin. It is clear that the reliance on the private car for commuting, particularly long distance commuting from outside of Dublin, is having a significant negative effect on traffic management itself but also, and more importantly in the medium and longer term, on the quality of the urban/rural environments and on quality of life.

It is a national priority to maximise existing public transport networks by developing appropriate sites which can utilise them. SDCC is playing its part in this regard through the preparation of the Planning Schemes for the Adamstown and Clonburris SDZs. Both SDZs are situated on the Kildare to Dublin Heuston line which, due to the upgrade the Phoenix Park Tunnel line now has direct trains to Connolly, Tara St, Pearse and Grand Canal Dock Stations. However, major infrastructure necessary for the long

term sustainable development of Dublin needs to be prioritised. TII's recently published "N4/N7 Corridor Study" has examined strategic National and Non-National Road Infrastructure in West Dublin and possible measures to preserve the strategic function of this infrastructure into the future. Proposed rail infrastructure (Dart Underground, Metro North) identified in the NTA "Greater Dublin Area Transport Strategy 2016-2035" (the Strategy) should be brought forward to encourage modal shift early in its lifetime.

In a Dublin context, additional investment is required to release lands for residential development. The most recent returns from the "Dublin Housing Task Force" (DHTF) relating to Quarter 4 of 2016 identified that the four Dublin authorities (i.e. SDCC, Dublin City, Dun Laoghaire Rathdown and Fingal) Core Strategy potential residential yield amounted to 176,464 units. However, of this 57,343 units, or 32% of the total, require investment in infrastructure in order for development to commence.

In order for Dublin to function efficiently, it is a national priority to urgent invest in enabling infrastructure. The NPF must address this situation. There is continued pressure on local authorities to reduce development contributions in order to improve the financial viability of projects. Therefore, authorities will become more reliant on Government funding for infrastructure investment. The Local Infrastructure Housing Activation Fund (LIHAF) represents a welcome means of addressing this. It is likely that in the medium to long term, a permanent form of LIHAF funding must become available in order to enable the timely provision of infrastructure and ensure that infrastructure deficits are not blamed for delays in the release of residential zoned land for development. SDCC is placed in a unique position to contribute to meeting Dublin's housing needs as the basic essential services are in place in the major residential zoned lands (including SDZs). What remains to be provided is the site specific enabling infrastructure. The Adamstown and Clonburris SDZs are long term projects which will deliver housing and associated development over the lifetime of the NPR.

Energy sustainability is a national priority. A comprehensive approach must be taken in which energy usage is minimised. Provision must be made for future energy sources which is integrated with other relevant considerations.

Developments in information technology and communications (ICT) have huge implications for how we live, work, do business, travel and interact and thus assume a priority of national importance. The availability of high quality infrastructure in this area has benefits in terms of enabling working from home thus reducing the need to travel and facilitating the accomplishment of other planning goals. ICT will have an increasingly influential role in people's lives and life choices.

The provision of water services, within the GDA, is a great challenge and a national priority. There needs to be continued investment in the upgrading of existing infrastructure to reduce wastage of water and provision made for a sustainable long term water supply to the GDA.

9. How should a National Planning Framework be implemented?

The NPF should be implemented horizontally through Government departments and vertically through the planning system. The quality of the NPF can only be measured by the degree to which it is realised and functions as a guiding document for the co-ordination and delivery of Government activity. In this regard, there needs to be an appropriate governance structure established where accountability is championed and where responsibility for overseeing implementation of the NPF is clearly defined and underpinned by SMART objectives.

It is important that the NPF is robust and adaptable in order to withstand changes in the political environment over its lifetime. The NPF needs to incorporate systematic review periods that facilitate changes in policies and objectives when required. The NPF's impact and implementation requires monitoring with a defined roadmap that outlines clear milestones, targets and deliverables.

A regional and sub-regional approach is necessary for implementation of the NPF. The RSES, development plans and local area plans will articulate NPF policy. However, at National Government level, in the interests of efficiency and to rationalise expenditure, there is need to identify and deliver key strategic infrastructure projects and spatial land use requirements that transcend administrative boundaries.

A strategic approach is needed to address the development of underutilised lands which are often hampered by change only occurring on an incremental basis. In this regard, a development agency model focussed on active land management, should be facilitated. Such a model must be supported by a dedicated funding stream.

In Dublin, at local government level, the SDZ model has been successfully adopted and has facilitated large scale development in a phased and integrated manner. SDCC has used this model to support the development of lands adjacent to existing high quality public transport links. SDZs have great potential as a means of implementing the NPF at a local level. However, development agencies need to have the ability to secure funding for key infrastructure where it is needed to support the development of SDZs. The SDZ model has experienced difficulties in accessing funding for social infrastructure to facilitate the ongoing delivery of housing within the framework of an integrated development.

10. What will success look like?

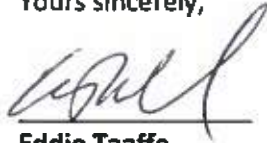
The success of the NPF should be measured by SMART objectives/indicators/metrics. It will also be evident in how well the NPF is transferred to other Government Departments policies and in shaping the prioritisation of investment in infrastructure. More broadly, success will be visible in the quality of the urban/rural environment, in whether targets in respect of emissions are reached and in areas such as changes in modal share in favour of sustainable modes of transport, reduced distance travelled from work to homes, the share of the population residing in urban areas and growth of regional cities such as Cork, Galway, Limerick and Waterford. In planning terms, success must be visible in the easy identification of NPF policies in RSES, development plans and local area plans.

Conclusion

While this submission largely relates to the development of Dublin and SDCC in particular, many of the principals outlined are equally applicable to the remainder of the country.

I trust that this submission will be taken into account in preparing the draft National Framework Plan. Please do not hesitate to contact me if you require any clarification or further information in respect of the issues raised.

Yours sincerely,



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