



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

10th November 2017

Re: Fingal County Council's Submission on Draft National Planning Framework - Ireland 2040 Our Plan

Dear Sir or Madam,

1.0 Submission Overview

The statement *"The World is Changing and Ireland is Changing Too"* (p.13) sets the backdrop for the broad and ambitious framework. Fingal plays a key and growing role in terms of the social and economic development of Dublin and Ireland. Home to a large modern enterprise base including Dublin Enterprise Zone (DEZ) and the national gateway Dublin Airport¹ together with a young, diverse and the fastest growing population in the country, Fingal County Council (FCC) is already delivering on the Major Urban Housing Development Sites (MUHDS) supported by the Government's Local Infrastructure Housing Activation Fund (LIHAF) and creating sustainable places by critically linking people to places with jobs.

FCC supports the ambition to achieve the highest quality of life which runs throughout the draft NPF. This ambition echoes our own submission to the Issues and Choices paper and the suggested future vision of **Ireland 2040 as a place with the ability to guarantee quality of life**. It is our view that this future vision is relevant to urban, suburban and rural Ireland and, rather than quality of life being 'as well as', quality of life is the outcome of strong economic output and stability, good environmental performance and a standard of liveability with rich and fulfilling experiences.

FCC supports the statement that *"Dublin needs to accommodate a greater proportion of the growth it generates within its metropolitan boundaries and to offer improved housing choice, transport mobility and quality of life"* (p.52). In this changing world Fingal's connectivity role within Dublin City Region, it is reasoned, will inevitably involve us choosing a future that sees the functional economic unit of Swords-Dublin Airport and Dublin City dynamically develop with Metro North in accordance

¹ In 2016, direct employment at Dublin airport is estimated to be 19,200 jobs (Dublin Airport Economic Impact study, InterVISTAS 2016). In 2015 the Dublin Airport Economic Impact Study found that 89% of the direct employment generated by Dublin Airport occurred in Fingal and that 26% of the total employment associated with the airport (direct, indirect, induced and catalytic impacts) occurred in Fingal.

with the best principles of sustainable growth to ensure Ireland remains within easy reach of Europe and the wider global economy.

FCC welcomes the opportunity to make this submission on the draft National Planning Framework (NPF). FCC in making this submission acknowledges the high-level nature of the framework and, as such, the submission approach is pitched accordingly. It is nevertheless crucial that the detail necessary to affect the framework at a regional level is considered in tandem. FCC's 6 key recommendations that aim to develop and advance the strategy behind the NPF:

- Acknowledging that “...in an economy and society such as Ireland’s, simultaneously fostering economic growth on the one hand and spreading it out smoothly or evenly across the country, is neither realistic nor practical” (p.32) the disproportionate allocation of population (500,000) and jobs (330,000) for the Eastern and Midlands Region, a real constraint on projected growth potential, in conjunction with the policy to align population and jobs will have a significantly detrimental impact on the international competitiveness and stability for the Region and Dublin’s unique role as an international city of scale. FCC suggests that the ambition of the principal elements of strategy for spatial distribution be appropriately applied in a **phased and proportionate manner** placing priority on recovery and to allow for greater stability within an uncertain Brexit period for the immediate and medium term. To achieve this reallocation of population and jobs targets would be necessary for the Eastern and Midlands Regional Assembly area over this term.
- The strategy to support the continued growth and success of Dublin as Ireland’s leading global city of scale and principal economic driver must include the **economic functional unit of Swords-Dublin Airport** within a redefined city and suburbs boundary. In tandem with the newly delimited functional urban area a proportionate population and jobs targets should be reallocated in recognition of the important connectivity and enabling role Fingal plays in the development of Dublin as a global city.
- The concept of compact or smart growth as proposed in the draft NPF should be applied with a holistic approach of both regeneration by infill/brownfield and the identified greenfield development areas, in recognition of the scale and nature of environmental challenges of ports and dockland areas when planning for climate resilience as part of the contained growth strategy, to ensure that residential and employment development is served by transport, infrastructure and amenities. It is recommended that the infill/brownfield NPOs are modified to take account such identified greenfield areas. Acknowledging the significance of planned high capacity public transport (Metro North) and existing heavy rail infrastructure FCC strongly advocate the identification of the future Local Area Plan lands at **Lissenhall (Swords)**, the Strategic Development Zone (SDZ) in **Hansfield**, and **Dunsink** as sustainable development locations of new greenfield areas for housing.
- Detailed demonstration of the evidence upon which the policy of aligning population and jobs is based is lacking in the draft. The decision to align population and jobs growth to occur within the same functional area does not **make provision to support areas that have grown to facilitate population growth** at a time of crises. National Policy Objectives 2a, 2b, 9a and 9b will require modification to provide special provision for areas that effectively require retrofitting of enterprises and employment opportunities to complete the place-making.

- Concerns exist around draft NPF policy of “*Relocating less intensive uses outside the M50 ring in particular and from the existing built-up area generally*” having consideration to the recent work undertaken by FCC and Government to attract high value Foreign Direct Investment (FDI). Further refinement is required to provide **clarity around the role of the immediate area outside the M50** to include recognition of the current role and future ability of this area to accommodate intensive high value employment.
- With respect to the national strategic outcome for ‘Enhanced Urban Amenity’ the role of Green Infrastructure (GI) planning and provision in climate adaptation should reflect the fact that **GI is critical infrastructure for the country and needs investment** for the full benefits to society to accrue.

2.0 Methodological Approach Taken

This ambitious document encompasses a broad sphere and is commended on doing it in a coherent and visually attractive way. Notwithstanding the coherency of the themes of regional parity and compact smart growth, there is real lack of clarity and transparency in respect to the methodologies chosen; missing illustrations of the spatially defined places of city & suburbs, city region and metropolitan areas; and, easy availability of evidence base used to support this new way forward.

Projections should be realistic, grounded in evidence and consistent with national projections, rather than based on aspiration (Morgenroth, 2017²). The ESRI acknowledge the difficulties that arise in making projections. Detailed demonstration of the evidence upon which the policy of aligning population and jobs is based is lacking in the draft. The decision to align population and jobs growth to occur within the same functional area does not make provision to support areas that have grown to facilitate population growth at a time of crises, nor does it take into account the reality of Dublin, as an international city of scale, where jobs do not necessarily equate to population location. National Policy Objectives 2a, 2b, 9a and 9b will require modification to support and recognise Dublin’s unique role, and to make special provision for areas that effectively require retrofitting of enterprises and employment opportunities to complete the place-making.

The use of variable terms, cross referencing to other documents for definitions and referencing by way of footnotes located in a separate Appendix instead of simply mapping the defined boundaries of, for example, the Metropolitan Region [also referred to as City Region] makes it extremely difficult to fully understand the spatial implications of the draft NPF. In addition, spatial boundaries referred to, such as the CSO settlement boundaries chosen to define the City and Suburbs can change between censuses and, therefore, direct comparison is not always possible. This may potentially give rise to issues when apply the National Policy Objectives (NPOs) at a regional and local level over the plan period and when monitoring the real impact of the framework.

² Presenting at the ‘Towards a National Planning Framework 2017’ organised by eolas and (then called) Department of Housing, Planning, Community and Local Government held at The Gibson Hotel March 2017.

3.0 The draft National Planning Framework

This submission will focus on:

- The Vision & Principal Elements of Strategy
- Key Future Growth Enablers for Dublin
- Implementation and Investment

The submission expands out on the intrinsically linked issues when relevant, and includes analysis of the detail of a particular national policy objective where it is believed that the NPF would benefit from further refinement.

3.1 The Vision & Principal Elements of Strategy

FCC considers that the multi-value based vision for Ireland 2040 contextualised against the hallmarks of being Irish - i.e. attachment to community, land and place is difficult to engage with. The vision, as articulated, is not considered to be of sufficient simplicity, strength or distinctiveness to form the basis for consensus building in future plan making. As stated in the summary above, it is considered that quality of life is the outcome of strong economic output and stability, good environmental performance and a standard of liveability with rich and fulfilling experiences rather than 'as well as'.

Our Regions and Rural Fabric and Ireland's Cities

The principal elements of strategy for more effective balance of growth between Ireland's three regions with new policy emphasis on renewing and developing existing built-up areas makes good planning sense. However, as recognised in the draft itself experience and research has shown that in an economy and society such as Ireland's it is neither realistic nor practical to try and direct large numbers of people to selected locations. FCC question the ambitions contained in the framework, i.e. to accelerate the development of and to grow the four cities by more than twice as much as they have done over the 25 years to 2016, especially in the context of the all-Island economy. The disproportionate allocation of population (500,000) and jobs (330,000) for the Eastern and Midlands Region, a real constraint on projected growth potential, will have a significantly detrimental impact on the international competitiveness and stability for the Region and Dublin's unique role as an international city of scale

The core message of the World Bank's *World Development Report (2009)*, as referred to in the draft NPF document, is that density of economic activity is the most important dimension for economic development. The World Bank Report recommended that countries should focus on overall national development to achieve international convergence in economic development and living standards and that spatially balanced growth within a country's borders should come thereafter, only when overall national convergence has been achieved (taken from p.23 of draft NPF).

Within the context of the succinct summary of the lessons learnt from the National Spatial Strategy (NSS) - included on page 23 of the draft - FCC suggest that the ambition of the principal elements of strategy for spatial distribution be appropriately applied in a phased and proportionate manner to allow for greater stability within the uncertain Brexit period.

Given Ireland's particular vulnerabilities to international shocks that might influence Foreign Direct Investment (FDI) and the Brexit challenge for Ireland it is suggested that the NPF should prioritise recovery and stability for the immediate and medium term. To achieve this reallocation of population and jobs would be necessary for the Eastern and Midlands Regional Assembly area proportionally over this term.

FCC supports the approach taken to target a pattern of development rather than precise numbers; however it considers that the framework as proposed places significant constraints on the projected growth of Dublin City Region potentially to the detriment of its pivotal role in the economy of Ireland. Enabling flexibility at the regional and local levels will provide a cushion to respond to the 'what if it doesn't happen' question in terms of delivery of the framework infill targets and prevent a negative constraint to Dublin city Region.

A lack of clarity in the spatial dimension of the city region and metropolitan region both referred to in the draft for Dublin makes it extremely difficult to assess the implications of the NPF at a county level and it will be under the RSES process were co-ordination and agreement between all 12 no. counties within the EMRA will be required to allocate the targeted population and jobs. Notwithstanding this, from a basic application of the targeted population allocation, a best effort on the basis of the information provided, the draft NPF growth targets do not appear to align with the Major Urban Housing Development Sites (MUHDS) and associated projects already enabled by the Local Infrastructure Housing Activation Fund (LIHAF) under the Government's Rebuilding Ireland Action Plan.

Our Capital, Dublin

FCC supports the statement that *"Dublin needs to accommodate a greater proportion of the growth it generates within its metropolitan boundaries and to offer improved housing choice, transport mobility and quality of life"* (p.52).

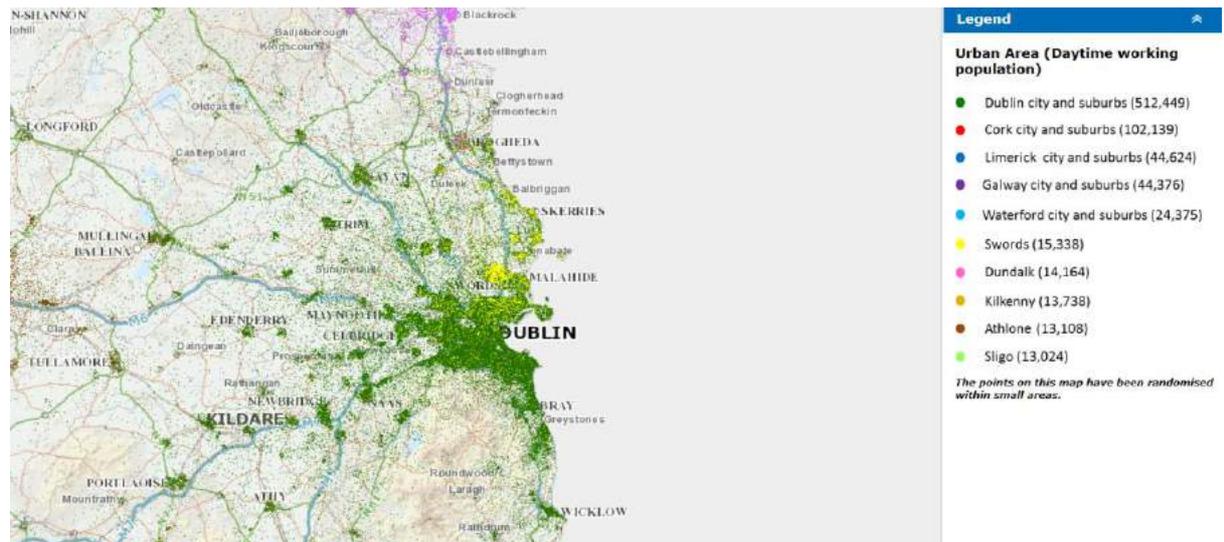
The draft NPF places emphasis on Dublin's position being ranked outside the top thirty cities in the world for liveability. It identifies liveability as one of the key challenges for Dublin. However, when drilling down into the facts behind this statement Dublin in terms of liveability is within the top tier, ranked within the same band and scoring higher than cities such as: - Seattle, Atlanta, Milan, London and Lisbon. The draft NPF does not place sufficient weight to the positive contribution the Dublin City Region makes to the economy of Ireland and its status as a good place to live.

Dublin is competing internationally with other similar mid-sized cities the majority of which fall within the same band when it comes to liveability rankings. In order to maintain competitiveness the draft NPF needs to provide stability, enable and align with Government strategies to attract FDI and reallocate the targeted population and jobs accordingly (please see section 3.2 for detailed submission on the key future growth enablers for Dublin).

FCC supports and welcome the identification of Dublin Airport's integral role to the capital and the statement on *"...Improving access to Dublin Airport, to include improved public transport access, connections from the road network from the west and north and in the longer term, consideration of*

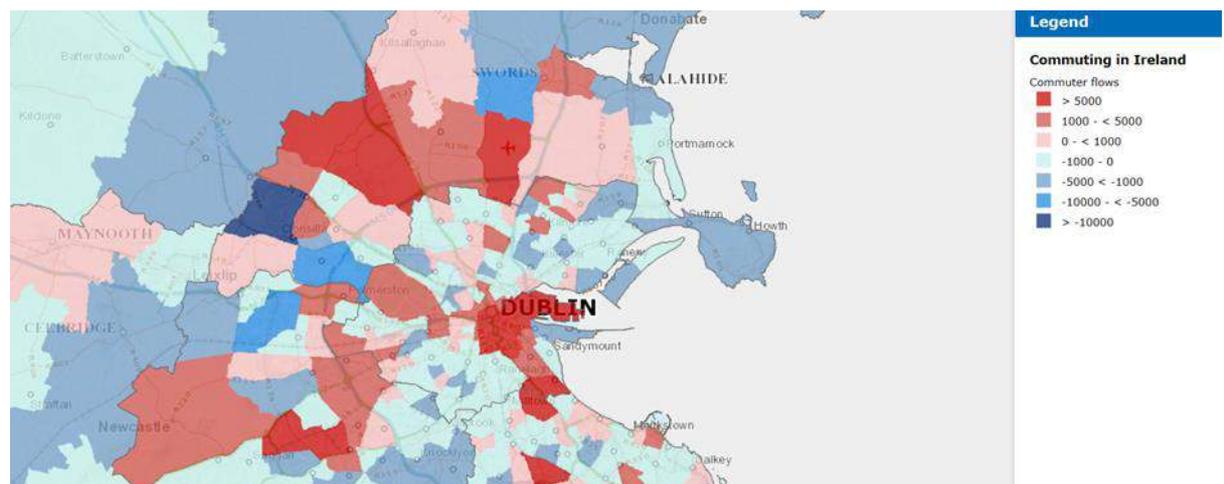
heavy rail access to facilitate direct services from the national rail network in the context of future electrification” (p.53).

The CSO definition of the settlement when applied to ‘Dublin City and Suburbs’, given that it is based on assessment of contiguity of built-up development and certain proximity criteria, cannot capture the functional economic unit of Swords-Dublin Airport which is physically separated, given the necessary Airport zonings, but economically integrated, as illustrated in Figure 3.1.1.



(Figure 3.1.1 as taken from CSO Catchment areas of major workplace locations, 2016)

Fingal is the top destination of work for Dublin City and Suburbs who commute, with nearly 17,000 workers making the journey to Fingal from Dublin (CSO Profile 6 Commuting in Ireland, 2016). Figure 3.1.2 illustrates the concentration of inward commuters to the Airport.



(Figure 3.1.2 as taken from CSO Commuter flows (inward commuters less outward) by electoral division, 2016)

Set against this, the strategy to support the continued growth and success of Dublin as Ireland's leading global city of scale and principal economic driver must therefore include the economic functional unit of Swords-Dublin Airport within a redefined boundary.

The NPF should make a clear statement on the economically integrated role between Swords-Dublin Airport and the City as a functional urban area in recognition of the important connectivity and enabling role of Fingal in Dublin. In this context it is reasoned that the methodology to delimitate the functional urban area of 'Dublin City and Suburbs' should be modified, with proportionate population and jobs re-allocation, to connect the non-contiguous area in recognition the functional economic unit of Swords–Dublin Airport and its economic integration with the city core (as stated section 3.2 of this submission addresses to the specific key future growth enablers for Dublin).

Compact Growth

The concept of compact or smart growth as proposed in the draft NPF should be applied holistically to ensure that residential and employment development is served by transport, infrastructure and amenities. The significant greenfield areas for housing, especially those on public transport corridors must be accommodated when applying the National Policy Objectives 3a, 3b and 3c to achieve effective density and consolidation.

The Strategic Environmental Assessment (SEA) and Strategic Flood Risk Assessment (SFRA) highlight the scale and nature of challenges, particularly with regard to environmental impact, to the use of the infill/brownfield targets as part of the contained growth strategy when taking into account flood risk and future predications which account for climate change. The robustness of the infill/brownfield targets to facilitate delivery of the framework must be considered in the context of accessibility of location by high capacity public transport and, in particular brownfield within dockland and port areas, a consideration given to likely flood risk and future predictions for flood which account for climate change. The concept of compact or smart growth as proposed in the draft NPF should be applied with a holistic approach of both regeneration by infill/brownfield and the identified greenfield development areas.

It is recommended that the NPOs are modified to make provision for development on the significant greenfield areas for housing that can be integrated with the existing built-up area and be serviced by high capacity public transport.

3.2 Key future growth enablers for Dublin

FCC agrees with the statement that *“Dublin is the engine of Ireland’s economy...”* and welcome the identification of Dublin Airport as a key future growth enabler for Dublin. As previously stated, in section 3.1 of this submission, the strategy to support the continued growth and success of Our Capital Dublin as Ireland's leading global city of scale and principal economy driver must, therefore, it is reasoned incorporate spatially the economically integrated functional economic unit of Swords-Dublin Airport within its urban core in order, with proportionate re-allocation of population and jobs, to enhance co-ordination of development.

This section of the submission relates to a number of the identified (bullet points set out on p.53), key future growth enablers for Dublin that FCC consider would benefit from further refinement:

- FCC supports the holistic approach proposed to offer improved housing choice, transport mobility and quality of life in Dublin and the recognition of the need for development of sites that will be serviced by high capacity public transport. As in section 3.1, it recommended the NPOs for infill/brownfield targets should be modified to take into account these locations. In this respect, acknowledging the economic, social and environmental significance of Metro North providing transport mobility to an area experiencing rapid population growth FCC strongly advocate the identification of the future Local Area Plan lands at **Lissenhall** (Swords), the heavy rail line serviced Strategic Development Zone (SDZ) in **Hansfield** and **Dunsink** as sustainable development locations of new greenfield areas for housing.
- Having consideration to recent effort undertaken by FCC in terms of attracting high value FDI such as the Pharmaceutical Industry, ICT and financial services to suitable areas outside the M50, concerns exist around NPF policy of *“Relocating less intensive uses outside the M50 ring in particular and from the existing built-up area generally”*. Further refinement is required to provide clarity around the role of the immediate area outside the M50, this is particularly important in the context of the recent Government bid for the relocation of the European Medicines Agency to Dublin Airport Central, to include recognition of the current role and future ability of this area to accommodate intensive high value employment at this location. It is clear that Dublin is, and will continue to be, crucial in the attraction of inward investment to the country and it is critically important that the policies set out in the NPF aligns with Government strategy to attract FDI and do not compromise Dublin’s ability to accommodate this investment.



(Figure 5.3 – 2035 Metropolitan Light Rail Network as taken from the National Transport Authority’s Transport Strategy for the Great Dublin Area 2016-2035)

- FCC support the identification of the key rail projects set out in the *Transport Strategy for the Greater Dublin Area*; the improved bus-based system with better orbital connectivity and integration with other transport networks; delivery of the metropolitan cycle network; and improving access to Dublin Airport to include improved public transport access, connections from the road network from the west and north and in the longer term, consideration of heavy rail access to facilitate direct services from the national rail network in the context of potential future electrification. Fingal has a key and growing connectivity and enabling role in the development of Dublin as a global city and the NPF by incorporating Swords-Dublin Airport using a different methodology to delimitate the functional urban area will appropriately recognise the uniqueness of Dublin and allow for enhanced coordination of development.
- FCC welcomes the continued support and intention to promote and enhance the international visibility of the Dublin-Belfast Economic Corridor. The draft NPF acknowledges that international connectivity along with short travel times to an airport with a good choice of destinations is a critical factor to economic prosperity and the attractiveness of places to highly skilled potential employees. Fingal’s current and future connectivity role and potential to act as an integrated transportation hub, including regional transportation interchange and strategic Park and Ride facilities at Lissenhall, provides transport mobility for the city,

improves and protects the strategic function of the Dublin-Belfast Economic Corridor and TENT-T network; and, as such, should be clearly identified in the document.

3.3 Investment and Implementation

Eleven national strategic outcomes, including the overarching national strategic outcome to achieve a strong all-island partnership, are identified to guide the implementation of the Ireland 2040 framework. Given that national investment planning, the sectoral investment and policy frameworks of departments, agencies and local government process will be guided by these strategic outcomes it is critical that these outcomes connect to and deliver on the eight strands of the vision for Ireland 2040.

Taking this into account the following recommendations are put forward in respect of the national strategic outcomes:

- The Ireland 2040 Vision includes the commitment to be the most successful, advanced, competitive and environmentally sustainable economy and society in Europe. To achieve this FCC suggests that the national strategic outcome for 'Compact, Smart Growth' is expanded to include the Metropolitan Areas and associated Metropolitan Area Strategic Plans (MASPs). As it reads currently this level of urban structure is excluded.
- With respect to the national strategic outcome for 'Enhanced Urban Amenity' the role of Green Infrastructure (GI) planning and provision in climate adaptation should be clearer. GI should be seen to be in a similar position to physical grey infrastructure in terms of the requirement for investment, protection and management and as an enabler of wider planning and environmental objectives. The NPF should provide for the integration of GI planning at regional level in the forthcoming Regional Spatial & Economic Strategies. The NPF should ensure that a GI planning approach underpins all County Development Plans and Local Area Plans to support and facilitate investment in green infrastructure by local authorities as a vital resource for the future.

The purpose of local government is to provide place-based leadership, foster innovative approaches to citizen empowerment and the co-creation of solutions for the common good³. The NPF, as proposed, sets a new way forward for enhancing leadership and a strategic approach to local planning. By creating new and additional tiers within the established planning hierarchy concerns arise in relation to the potential for impacting upon the effectiveness of local government and the role of citizens. We note that these new arrangements will be subject to further statutory underpinning, however, as these are not isolated components to the NPF we would recommend that the document identifies holistically the necessary top-down and bottom up approach required to affect the new way forward ensuring local government effectiveness.

³ Hambleton, R. Leading the Inclusive City (2015).

4.0 Conclusions

To conclude, in a context of Brexit uncertainty generally - uncertainty of projections and uncertainty around future migration flows especially - it is difficult to interpret how realistic, reasonable, viable and implementable this framework will be as is currently drafted. Set against this uncertainty FCC suggest that the ambition of the principal elements of the strategy for spatial distribution be appropriately applied in a phased and proportionate manner to allow for greater stability and, acknowledging the uniqueness of Dublin, support the continued growth and success of the global city of scale.

We thank you for this opportunity to further contribute to the strategy development.

Annamarie Farrelly
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Planning & Strategic Infrastructure Department
Fingal County Council