



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

10 November, 2017.

Ireland 2040: National Planning Framework 2040

To whom it may concern,

This letter is submitted by the Chief Executive of Dublin City Council, and includes a summary of observations made by the Strategic Policy Committee and City Councillors of Dublin City Council.

Dublin City Council welcomes and supports the development of the National Planning Framework (NPF) and welcome the opportunity to further participate in and contribute towards setting the strategic planning context for the nation in the coming decades.

In particular, the City Council welcomes the following elements of the strategy identified for Dublin;

- *Supporting the continued growth and success of Dublin as Ireland's leading global city of scale and principal economic driver, by better managing Dublin's growth to ensure that more of it can be accommodated within and close to the City.*
- *Enabling significant population and jobs growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties manifesting as unsustainable sprawl.*
- *Addressing infrastructural bottlenecks, improving citizens' quality of life and increasing housing supply in the right locations*

Section 3.7 of the draft NPF acknowledges the key role that urban centres will play in the future development of the country; *The pattern of urban growth targeted in Ireland 2040 is population and capacity led, recognising that firms and enterprise development are predominantly drawn to urban locations, driven by market forces such as agglomeration, migration and specialisation that depend on factors such as scale, accessibility, innovation supported by third level institutions and quality of life.*

Dublin is competing on an international level rather than with other regions nationally. It is clear Dublin is a net contributor in economic terms to the nation and it is vitally important that this role is supported and not restricted or hampered. It is crucial that the NPF ensures that Dublin, as a capital city and city region, is planned for in such a way that it can continue to play its vital international role.

A presentation of the draft NPF was made to the Planning and Property Development Strategic Policy Committee. Arising from this, and in addition to the Chief Executive's submission, the following additional comments are submitted.

Metropolitan Plan

Section 9.2 of the draft NPF proposes to deliver Metropolitan Area Strategic Plans (MASPs) for the major urban areas, including Dublin. The City Council is not clear about the role of the MASP in the context of the forthcoming Regional Spatial and Economic Strategy for the Eastern and Midland Regional Assembly and the various City and County Development Plans. The provision of an additional layer of statutory planning is potentially of concern having regard to the lack of clarity as to their overall purpose and in relation to the responsibility for preparation and implementation of the

Plan. For example a MASP based on the NTA 2035 Strategy boundary will involve seven different City and County Councils.

Sustainable Growth

In relation to 'Our Capital' the following points are welcomed as being key elements of the NPF Strategy (p31):

Supporting the continued growth and success of Dublin as Ireland's leading global city of scale and principal economic driver, by better managing Dublin's growth to ensure that more of it can be accommodated within and close to the City.

Enabling significant population and jobs growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties manifesting as unsustainable sprawl.

Addressing infrastructural bottlenecks, improving citizens' quality of life and increasing housing supply in the right locations.

As was indicated in the letter from the Chief Executives of the four Dublin Local Authorities, there is concern that the growth targets identified for Dublin in the NPF are not appropriate and that they could restrict the envisaged growth of Dublin into the future. The City Council, through the Dublin City Development Plan 2016-2022, supports and encourages sustainable growth patterns in the City Council area and it is fundamental that the NPF also does the same.

Infrastructure

In order for the potential of the Dublin Region to be achieved, investment in crucial infrastructure is necessary to underpin and support the future development of the City Region and needs to be secured in advance or in tandem with development. In this regard, the City Council welcomes the identification of key future growth enablers for Dublin in section 3.9. It is essential that the 10 year National Investment Plan provides for these elements to be copper fastened for delivery and that key infrastructure is delivered.

More clarity is needed as to whether the draft NPF provides for the delivery of DART Underground project. Dublin City Council is of the opinion that the DART Expansion project referenced in the draft NPF and relating to the NTA Transport Strategy for the Greater Dublin Area 2016-2035 provides for DART Underground, as indicated in section 5.2.2 of the NTA Strategy. We would request confirmation of this having regard to the key strategic benefit to the future sustainability of Dublin Region of the implementation of DART Underground, or a variation thereof.

This should not be restricted to 'big ticket' transport and engineering infrastructure but should also address softer but key supporting infrastructure such as public realm and urban place making interventions.

It is useful to quote from the European Commission report on Ireland, indicated in the City Council submission during the previous NPF drafting stage;

"Addressing the shortcomings in transport infrastructure and spatial planning is a growing challenge. To address this growing problem, the Irish authorities face a quadruple challenge: delivering additional transport capacity, finding the right balance between public and private transport, improving the efficiency of transport corridors by means of careful spatial planning, and limiting carbon emissions from transport. Moreover, main urban areas also face large housing supply shortages (Section 4.5.1). The timely and targeted expansion of rail and road networks is crucial to allow for the development of housing projects of sufficient scale. In turn, the strategic positioning of those projects close to public transport corridors again highlights the important role of spatial planning."¹

¹ European Commission, 2017, COMMISSION STAFF WORKING DOCUMENT Country Report Ireland

The NPF must clearly align the projects contained in the National Investment Plan with the strategic objectives contained in the NPF and ensure their delivery in order to provide for the sustainable development of the country.

Smart Growth Initiative

The City Council notes that the draft NPF references a 'competitive bid' element to the Smart Growth Initiative aimed at supporting strategic growth and renewal of under-utilised parts of cities. Although there are criteria set down on page 132, it is not clear how this process is envisaged to work and the City Council would welcome clarity on this issue.

Cycling and walking

The role that cycling and walking plays, and will continue to play, in making Dublin, and Ireland, an attractive and healthy place to live and work is of key importance and the NPF should emphasise this role. Cycling complements the mixed uses and urban consolidation focus of the NPF and also has wide ranging benefits including addressing the issue of climate change and carbon emissions and increasing the health of the nation.

Uses outside the M50

One of the key future growth enablers identified by the draft NPF for Dublin is "Relocating less intensive uses outside the M50 ring in particular and from the existing built-up area generally". Objective CEE04 of the Dublin City Development Plan 2016-2022 is:

CEE04: (i) To carry out a targeted survey of those industrial estates with likely redevelopment potential and to make recommendations on how that redevelopment potential might be best achieved.

(ii): To carry out a study on the potential of lands zoned for enterprise and employment space, the adequacy of such potential supply, and the issue of underutilised/vacant lands

This process is underway and, in certain appropriate circumstances, may result in a change in zoning of certain underutilised land banks in the City Council area. This will go some way to addressing the above key growth enabler. However, it is important to ensure that there is still sufficient employment/light industrial/less intensive uses available in the City Council area in order to avoid a situation of reverse commuting that would be contrary to the principles of sustainable development. Clarity is therefore required in relation to what is meant by 'less intensive uses' and to ensure that any attempt to deflect such uses outside the M50 does not prejudice the provision of mixed use sustainable settlements within the City Council area.

Whole Government Approach

The draft NPF makes numerous references to the role it will play in all of the Government's future strategies and directions but it is considered that greater clarity is required in relation to how this is envisaged to take place. The provision of a well considered, robust and comprehensive NPF would be undermined if the provisions therein are not adequately translated across all arms of the Government. Dublin City Council would welcome further detail in relation to the implementation of the NPF and its role in the various Departments' strategic development. It is noted that the role of the Office of the Planning Regulator would appear to be limited to the monitoring of the statutory planning process.

National Land Development Agency

National Policy Objective 12 is "In urban areas, active land management will be applied to identify a range of opportunities to achieve targeted growth, up to and including the establishment of special purpose vehicles such as a national land development agency and seeking to broaden the applicability of compulsory purchase legislation to enable urban development in certain circumstances, to ensure the development infill and brownfield lands in the most sustainable economic and environmental manner possible".

The City Council is supportive of such an approach and has had an Active Land Management Unit located within the Planning Department since 2015. However, there is a lack of clarity in relation to the proposed 'national land development agency' as set out in Objective 12. Although the City Council

welcomes collaborative working with other State and public agencies, the transfer of City Council owned land to a separate agency would be of concern and represents a diminution of power at local authority level and a, perhaps unnecessary, further centralisation of decision making.

National Policy Objective 69 is "*A more effective strategic and centrally managed approach will be taken to realise the development potential of the overall portfolio of state owned and/or influenced lands in the five main cities and potentially other major urban areas as a priority*". Again, the City Council would request greater clarity in relation to the implementation of this objective and any implications in relation to loss of power at local authority level in relation to the development of local authority lands would be of concern.

Role of Culture and Heritage in the Vision and the NPF

In order to deliver high quality locations where people and employment wish to locate, a key consideration is the role of culture, creativity and identity. The NPF should be able to provide a platform for the creation and support of networks of culture and creativity as well as placing key significance on the support that heritage projects and a historic urban environment can play. It is also considered that the overall Vision of the NPF could perhaps be more succinctly communicated in order to ensure that there is clarity of vision and purpose and that it is easily understood by all.

Parking

National Policy Objective 11 is *In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria enabling alternative solutions that seek to achieve well-designed high quality and safe outcomes in order to achieve targeted growth and that protect the environment.*

In relation to parking it is considered vital to the interests of regional coherence that any parking standards that are being provided are uniform to all local authorities such that no advantage is provided to one authority over another.

The comments in section 3.8 and the related National Policy Objective 11 are noted. The need to move away from universal minimum car parking standards, an approach which is prevalent across local authorities, is acknowledged and accepted. However, the blanket requirement proposed in the plan for no car parking in specified areas is considered inappropriate. A reduction in car parking provision may be appropriate in one location but not another. It may be appropriate for one use category but not another. Applying a blanket requirement across areas and uses minimises the ability of planning authorities to assess on a site by site basis the mobility requirements of different developments and the potential impact of none or minimal car parking provision on existing communities.

Car parking plays an important role in influencing travel behaviour but it is also an important amenity and requirement for residents of different ages and abilities within the city. It is an important consideration for families with young children when choosing where to live.

It is recommended that Dublin City Council's approach to car parking policy should be considered as a model for replication across the country. This model was initially developed to influence modal shift but has evolved over time to address the complexities of mobility and liveability within a capital city.

Dublin City Council recommends that in place of a blanket 'no requirement for car parking' in specified areas, the Dublin City Council model of maximum, accessibility based car parking standards coupled with a flexible and innovative approach be promoted in the National Planning Framework.

Height

The City Council supports the provision of tall and landmark buildings in specific and appropriate locations, as set out in the Dublin City Development Plan 2016-2022. Emphasis should be placed on

achieving quality densities in the city. In this regard, landmark buildings alone cannot provide for the required densities in the Metropolitan Area. It is considered that further consultation with the relevant stakeholders is necessary prior to the issuing of any National guidelines in relation to the height.

Brexit

It is considered that Dublin is ideally located both geographically and socio-politically to address any fallout from Brexit and any opportunities that arise therefrom. The NPF needs to ensure that no constraints are placed on the ability of Dublin to compete for business opportunities post-Brexit but rather that it is well placed to facilitate any support any such situations.

Social Inclusion

It is considered that the issue of social inclusion and social disadvantage is a key element of ensuring a healthy and equitable society. To this end, the City Council would welcome inclusion in the NPF of objectives and strategies for ensuring social inclusion and addressing social disadvantage.

Conclusion

The City Council welcomes the preparation of the draft NPF and considers that it has the potential to deliver security of planning, including the delivery of essential strategic infrastructure, that will ensure the appropriate development of the country in the coming decades.

The City Council particularly welcomes the vision for Dublin including;

- supporting the continued growth and success of Dublin as Ireland's leading global city of scale and principal economic driver,
- enabling significant population and jobs growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties manifesting as unsustainable sprawl, and
- addressing infrastructural bottlenecks.

The statutory backing of the draft NPF is welcomed by the Local Authorities and will ensure compliance and delivery of the goals of the NPF throughout the levels of statutory planning in Ireland. Linking of the draft NPF to the National Investment Plan is also welcomed and is considered vital in relation to the successful, timely and secure delivery of strategic infrastructure.

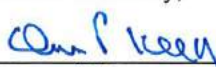
The references to the cross-Departmental nature of the draft NPF as indicated throughout the document, is also welcomed by the Local Authorities as a clear statement of the key importance of the NPF throughout all sectors of Irish government and society.

It is essential that Dublin's role nationally and internationally is not only supported by investment in housing and infrastructure but that the NPF does not in any way act as a restrictor or inhibitor of growth in the Dublin area.

To that end it is requested that the Department takes on board the issues raised by the City Council as set out above, and in the letter submitted by the Chief Executives of the four Dublin Local Authorities, in the finalisation of the NPF.

I would welcome the opportunity to further discuss on or expand on the matters raised above, if you so wish.

Yours sincerely,



Owen P Keegan
Chief Executive, Dublin City Council



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Forward Planning Section,
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10 November, 2017.

Ireland 2040: Draft National Planning Framework 2040

To whom it may concern,

This letter is submitted on behalf of the Chief Executives of the four Dublin Local Authorities (Dublin City Council, Fingal County Council, South Dublin County Council and Dun Laoghaire-Rathdown County Council). It will be supplemented by separate individual submissions, covering matters particular to each Local Authority.

The four Dublin Local Authorities (which make up the Dublin Region) welcome and support the development of the National Planning Framework (NPF) and welcome the opportunity to further participate in and contribute towards setting the strategic planning context for the nation in the coming decades.

We particularly welcome the vision for the Dublin Region including;

- Supporting the continued growth and success of Dublin as Ireland's leading global city of scale and principal economic driver, by better managing Dublin's growth to ensure that more of it can be accommodated within and close to the City.
- Enabling significant population and jobs growth in the Dublin metropolitan area, together with better management of the trend towards overspill into surrounding counties manifesting as unsustainable sprawl.
- Addressing infrastructural bottlenecks, improving citizens' quality of life and increasing housing supply in the right locations.

The statutory backing of the draft NPF is welcomed by the Local Authorities and will ensure compliance and delivery of the goals of the NPF throughout the levels of statutory planning in Ireland.

Linking of the draft NPF to the National Investment Plan is also welcomed and is considered vital in relation to the successful, timely and secure delivery of strategic infrastructure.

The references to the cross-Departmental nature of the draft NPF as indicated throughout the document, is also welcomed by the Local Authorities as a clear statement of the key importance of the NPF throughout all sectors of Irish government and society.

This joint submission concentrates on three interrelated strategically important areas; international competitiveness, population & housing and critical infrastructure provision.

As is indicated in section 3.5 of the draft NPF, *Dublin is Ireland's globally competitive city of scale and continues to drive much of the growth of the country as a whole*. The key and unique role that the Dublin Region plays nationally needs to be supported and encouraged by the NPF. The NPF needs to acknowledge that Foreign Direct Investment and associated economic activity will locate at the optimal location for such investment. In the current and future global economic market, such locations are trending ever more towards well connected and sustainable global metropolitan areas. In a national context, the only such location is the Dublin City Region. It is important to note that due to its

particular locational and socio-economic context, Dublin is ideally placed to address the fallout from Brexit and any opportunities that may arise therefrom. It is therefore crucial that the draft NPF acknowledges the role of the Dublin Region and ensures that any measures contained therein support and enhance Dublin's position in the global economy and do not damage its potential to compete on a global stage.

It is crucial that the NPF provides for adequate housing in the City Region in order to support future economic development and so as to provide a compact metropolitan area in the interests of sustainable planning. The draft NPF rightly stresses that employment and housing should be located as close as possible to each other and/or readily connected by means of high quality public transport networks. There is, therefore, concern that the housing allocation provided for the Dublin Region in the draft NPF is not adequate to support the anticipated increase in employment and population. An examination of the Core Strategies of the recently approved Development Plans for the four Dublin local authorities reveals an annual anticipated increase in population of c17,400 in the period up to 2022. Carrying this trend towards the 2040 period of the draft NPF would provide for c418,000 persons. In contrast, the draft indicates a figure of 264,000 for Dublin city and suburbs. Even allowing for the non-Metropolitan location of some of the population growth in the north Fingal County Council area, and having regard to the additional areas of Kildare, Meath and Wicklow County Councils that are included in the Metropolitan area identified in the draft NPF, this is of potentially serious concern.

Likewise it is of concern whether the draft NPF is able to provide for the annual housing targets provided for in the Core Strategies of the four Local Authorities (Dublin City Council 4,200 min, Fingal 7,090, South Dublin County Council 4,571 and Dun Laoghaire-Rathdown County Council 3,300). It is vital that the NPF does not artificially constrict the growth of the Dublin Region or place unrealistic limits in relation to population growth and the housing numbers to provide for this growth.

Aside from the allocation of future population growth for the Dublin Region potentially being interpreted as an unrealistic and artificial upper limit to growth, a further area of concern is that the growth scenarios outlined for the other Regions also act as a barrier to the growth of the Dublin Region - particularly in the event that the proposed targets are not being met in the other two Regions. This would be seriously prejudicial to the growth of Dublin as an internationally competitive region for the benefit of the whole country. We would therefore welcome clarity be included in the NPF that that the population targets for any one Region should not curtail the attainment of population targets by other areas.

In order for the potential of the Dublin Region to be achieved, investment in crucial infrastructure is necessary to underpin and support the future development of the Region and needs to be secured in advance of, or in tandem with, development. In this regard, the four Dublin local authorities welcome the identification of key future growth enablers for the Dublin Region as set out in section 3.9 including:

- *Identifying a number of ambitious large-scale regeneration areas for the provision of new housing and employment throughout the city and metropolitan area and the measures required to facilitate them as integrated, sustainable development projects.*
- *Progressing the sustainable development of new greenfield areas for housing, especially those on public transport corridors, such as Adamstown, Cherrywood, Clonburris and Clongriffin.*
- *Determining a limited number of accessible locations for significant people-intensive employment to complement the city-centre and docklands areas.*
- *Delivering the key rail projects set out in the Transport Strategy for the Greater Dublin Area including Metro North, DART expansion and the Luas green line link to Metro North.*
- *The development of an improved bus-based system, with better orbital connectivity and integration with other transport networks.*
- *Ensuring that water supply and wastewater needs are met by new national projects to enhance Dublin's water supply and increase waste water treatment capacity.*

- *Public realm and urban amenity projects, focused on streets and public spaces, especially in the area between the canals and where linked to social regeneration projects.*
- *Delivery of the metropolitan cycle network set out in the Greater Dublin Area Cycle Network Plan inclusive of key commuter routes and urban greenways on the canal, river and coastal corridors.*
- *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.*
- *Facilitating the growth of Dublin Port through greater efficiency, limited expansion into Dublin Harbour and improved road access, particularly to/ from the southern port area.*

It is essential that the 10 year National Investment Plan provides for these elements to be copper fastened for delivery.

As was indicated at pre-draft stage, the success of the Dublin Region is not based merely on scale but rather is due to a subtle combination of, inter alia, accessibility factors, critical mass, provision of a skilled labour force, social and community infrastructure and housing provision. It is vital that the NPF provides the platform for all of these elements to be supported and delivered.

It is requested that the Department takes on board the issues raised in this submission and we would welcome the opportunity to further discuss or expand on the matters raised above, if you so wish.

Yours sincerely



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Philomena Poole
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