



## Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

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### **Fingal County Development Plan 2023-2029 – Public Consultation Issues Paper**

The Eastern and Midland Regional Assembly (EMRA) notes the publication of the Issues Paper to inform the preparation of the new Fingal County Development Plan 2023-2029 and sets out hereunder observations on behalf of the Assembly. The submission has been prepared by the executive and approved by the members of the Eastern and Midland Regional Assembly at the meeting of 16<sup>th</sup> April 2021.

#### **Regional Spatial and Economic Strategy (RSES) 2019-2030**

The Council will be aware of the finalisation of the Regional Spatial and Economic Strategy for the Eastern and Midland Region which was made on 28<sup>th</sup> June 2019. In line with the provisions of the Planning and Development Act 2000, as amended, the Planning Authority shall ensure, when making the County Development Plan, that it is consistent with the Regional Spatial and Economic Strategy for the Eastern and Midland Region, thus ensuring full alignment between local, regional, and national planning policy. In this regard, the Assembly welcomes the publication of the Issues Paper in preparation of the new Fingal County Development Plan.

#### **Legislative Context**

As required by Section 11(2) of the Planning and Development Act 2000, as amended, the Regional Assembly received notice from the Council on March 12<sup>th</sup>, 2021 of its intention to review its existing County Development Plan and to prepare a new County Development Plan for its area.

Under Section 27A of the Planning & Development Act, 2000 as amended, the Eastern and Midland Regional Assembly, is obliged to prepare submissions / observations to be submitted to the relevant planning authority and copied to the Minister and the Office of the Planning Regulator.

The submission of the Regional Assembly shall include, but shall not be limited to, recommendations regarding a number of matters including; any policies or objectives for the time being of the Government or any Minister of the Government in relation to national and regional population targets, and the best distribution of residential development and related employment development with a view to (i) promoting consistency as far as possible, between housing, settlement and economic objectives

in the draft development plan and core strategy and the regional spatial and economic strategy, and (ii) assisting in drafting the core strategy of the draft development plan; the objectives of providing physical, economic or social infrastructure in a manner that promotes regional development through maximising the potential of the regions; planning for the best use of land having regard to location, scale and density of new development to benefit from investment of public funds in transport infrastructure and public transport services; and collaboration between the planning authority and the regional assembly in respect of integrated planning for transport and land use, in particular in relation to large scale developments and the promotion of sustainable transportation strategies in urban and rural areas, including the promotion of measures to reduce anthropogenic greenhouse gas emissions and address the necessity of adaptation to climate change.

Accordingly, this report contains the opinion of the Eastern and Midland Regional Assembly in relation to the above matters along with recommendations as required under Section 27A of the Planning and Development Act 2000 as amended.

Under Section 11(4) of the Planning and Development Act 2000, as amended, A Chief Executive's Report prepared by the Planning Authority shall summarise the issues raised, and recommendations made by the Eastern and Midland Regional Assembly in accordance with Section 27A of the Act and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the draft development plan.

## **Submission**

The Regional Assembly welcomes the explicit recognition in the Strategic Issues Paper, of the policy hierarchy with which the County Development Plan (CDP) is required to be consistent with, including reference to the Regional Spatial and Economic Strategy (RSES) 2019-2031 and Project Ireland 2040 - National Planning Framework (NPF) and National Development Plan 2018-2027 and other policies and Guidelines of the Government including the Climate Action Plan 2019-2024, the Transport Strategy for the Greater Dublin Area (GDA) 2016-2035, Rebuilding Ireland and the National Marine Planning Framework. The Assembly also welcomes the inclusion of an evidence based socio-economic profile of Fingal County, which sets the context for the review of the County Development Plan.

The Assembly recognises the efforts made by the Council in encouraging public participation in the preparation of the Development Plan during ongoing periods of COVID public health restrictions and welcome the use of online channels and webinars to facilitate engagement.

## **1.0 Ensuring Consistency with the RSES – Key Areas**

Notwithstanding the requirement of the Planning Authority to ensure that the County Development Plan (CDP) 2022-2028 is consistent in its entirety with the RSES, Section 1.0 of this submission highlights key areas for consideration to promote consistency with the RSES and assist in drafting the core strategy of the CDP, and Section 2.0 sets out an individual response to each of the seven themes highlighted in the Strategic Issues Paper.

The Assembly welcomes the recognition given in the Strategic Issues Paper to the ‘RSES Settlement Strategy’, which sets the spatial framework for future development in the Region and the ‘Metropolitan Area Strategic Plan’ (MASP), which is a key policy driver for the sustainable growth of the Dublin Metropolitan Area (DMA).

### **1.1 Vision and Strategic Outcomes**

In determining the overall vision of the new draft Fingal CDP, the Council should consider the Vision, Key Principles and Regional Strategic Outcomes (RSOs) of the RSES Chapter 2. The RSOs are aligned to the National Strategic Outcomes (NSOs) of the NPF, and it should be noted that the ability to demonstrate delivery of these may potentially be linked to future funding sources. The three Key Principles underpinning the RSES are Healthy Placemaking, Climate Action and Economic Opportunity.

### **1.2 Growth Strategy of the RSES**

In preparing the draft CDP, it should be noted that Growth Enablers are specified in Section 3.2 of the RSES to facilitate sustainable growth across the Region. Growth Enablers are underpinned by the spatial mapping of Functional Urban Areas (FUAs) within the Region. The attention of the Council is brought to the general Growth Enablers for the Eastern and Midland Region, Growth Enablers for Dublin City and Metropolitan Area, Growth Enablers for the Core Region and Growth Enablers for the Dublin – Belfast Economic Corridor, which is identified as a key regional and national economic driver.

### **1.3 Sustainable Compact Growth**

The delivery of compact growth through the development of underutilised, brownfield and infill sites that are close to existing services and infrastructure, plays a key role in achieving sustainable development, in line with National Strategic Outcome (NSO 1) of the National Planning Framework (NPF) and Regional Strategic Outcome (RSO 2) of the RSES.

The Council's attention is brought to RPO 3.2 (Chapter 3 – Growth Strategy) of the RSES which requires local authorities, in their core strategies to set out measures to achieve compact growth targets of at least 50% of all new homes within or contiguous to the built-up area of ‘Dublin City and Suburbs’<sup>1</sup>, and a target of at least 30% for other urban areas. Further to this RPO 3.7 states that local authorities shall have regard to environmental and sustainability considerations for meeting their sustainable development targets and climate action commitments.

To support achievement of compact growth targets, Section 3.2 of the RSES sets out Guiding Principles for infill and brownfield development, which includes the creation of a brownfield database at the local level and the inclusion of focused active land management measures in the CDP. RPO 3.3 also

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<sup>1</sup> The urban footprint of ‘Dublin city and suburbs’ as defined by the Central Statistics Office (CSO)

determines that regeneration lands are identified in core strategies and that specific objectives are set out including consideration of targeted zoning objectives and active land management measures to drive the regeneration of these lands. It is anticipated that further guidance on the delivery and monitoring of compact growth will be addressed in upcoming Department of Housing, Local Government and Heritage (DHLGH) Ministerial Guidelines for Development Plans.

## 1.4 Settlement Strategy of the RSES

In developing the settlement hierarchy for the County as part of the core strategy of the draft CDP, the Council shall ensure consistency with the settlement strategy set out in Table 4.2 of the RSES (Chapter 4 – People and Place), in defining key locations for strategic residential and employment development to support the achievement of sustainable compact growth.

The RSES used an asset-based approach to define a settlement hierarchy for the Region, with a focus on consolidation of the existing built-up area of 'Dublin city and suburbs' as a city of international scale, which includes part of the administrative area of Fingal, including Blanchardstown and other urban areas, forming the top tier in the regional settlement hierarchy. The RSES also identifies a number of Key Towns including Swords, which is located in the wider Dublin Metropolitan Area (DMA), as large economically active towns that have the capacity to act as drivers for growth, forming the third tier in the regional settlement hierarchy.

The designation of lower tier Self-Sustaining Growth Towns, Self-Sustaining Towns, Towns, Villages and Rural areas will be considered in the upcoming draft CDP and it is recommended that the Council, in preparing their core strategy should use consistent terminology to that set out in Table 4.2 of the RSES. The Council shall ensure that settlements provide for sustainable population and employment growth at a level appropriate to their position in the settlement hierarchy, in line with the settlement typologies set out in Table 4.3 of the RSES and NPO 9 of the NPF.

The draft CDP shall also ensure consistency with the Dublin Metropolitan Area Strategic Plan (Chapter 5 – MASP), which sets out a vision and spatial framework for Dublin city and suburbs to grow to a population of 1.4 million people and for a population of 1.65 million in the wider Dublin Metropolitan Area (DMA), by 2031. Section 5.3 sets out Guiding Principles for consolidated growth and accelerated housing delivery in the metropolitan area and Table 5.1 of the MASP identifies a number of strategic development areas (SDAs) linked to the phased delivery of key enabling transport, infrastructure, amenities, and services (RPOs 5.4 and 5.5 refer).

Of relevance to Fingal are the identified SDAs in the 'City Centre within the M50', which identify the long-term development potential of the major strategic landbank of Dunsink, subject to feasibility. Also of relevance are the continued development of Dublin 15 lands at Hansfield, Barnhill and Kellytown on the North-West (Maynooth/DART + rail line) Corridor, and the potential for sequential development of strategic residential sites within Swords and Oldtown-Mooretown on the Metrolink/LUAS Green line Corridor, and the potential to develop a new mixed-use urban district on the northern side of Swords

at Lissenhall linked to the delivery of the Metrolink in the medium to long term. The core strategy of the upcoming CDP should have a focus on the delivery of identified SDAs in the MASP while retaining flexibility to provide for ongoing opportunities for increased densities, reduced vacancy and re-use of underutilised lands within existing built-up areas.

## 1.5 National and Regional Population Targets

In preparing the core strategy of the draft CDP, the council must provide for an adequate supply of land and housing to meet projected population growth for the county. RPOs 4.1 and 4.2 of the RSES require core strategies to be determined in accordance with the population projections set out in the RSES and NPF, and that infrastructure investment be aligned accordingly with the spatial strategy.

Population targets are to be applied in line with Appendix B of the RSES (SPA and County Population Targets) and the requirements of the transitional population projections methodology in the Implementation Roadmap for the NPF, issued under DHPLG Circular FPS04/2018. There is a further allowance under National Policy Objective (NPO) 68 of the NPF for up to 20% of the phased population growth targeted in Dublin city and suburbs, to be accommodated in the wider metropolitan area. The transitional population projections for the Dublin MASP were approved by the elected members of the Regional Assembly on July 10th, 2020 and set out the following range of population projections for Fingal County; to 2026: 327,000 (low) – 333,000 (high) and 2031: 340,000 (low) – 369,000 (high).

The transitional population projections for the MASP will support the delivery of the identified capacity of strategic development areas (SDAs) in the Key Metropolitan Towns to 2031, as set out in Table 5.1 of the MASP. The projections for Fingal to 2031 (high) includes an allocation of 20,000 population for Swords. It should be noted that transitional population targets may be further adjusted as part of the ongoing monitoring and review of the RSES to ensure that they are applied to the delivery of compact growth in tandem with existing or planned high-capacity public transport corridors.

The core strategy of the draft CDP should be evidence based and set out a clear rationale for the provision of sufficient zoned land to meet projected population growth and provide for an adequate supply of housing over the lifetime of the plan, including a focus on the accelerated delivery of residential development areas within the MASP. The core strategy should also quantify the projected need for housing in settlements in the County, informed by a robust evidence-based analysis of demand, past delivery and potential, including demand for single housing in the countryside, in line with National Policy Objective 20 of the NPF, and as part of the local authority's overall Housing Need Demand Assessment (HNDA) and development plan process.

The Assembly acknowledge the policy gap in relation to Housing Strategy and Development Plan Section 28 Guidelines and will support local authorities, either individually or combined, in preparing a HNDA (RPO 9.5 refers) and considers the four Dublin Authorities should apply a consistent methodology in this regard. The publication by the Department of Housing, Local Government and Heritage (DHLGH) in December 2020, of Section 28 Guidelines on Housing Supply Target Methodology and accompanying

ESRI Structural Housing Demand, in addition to the transitional population projections methodology in the NPF Implementation Roadmap, will assist the Council in integrating national and regional population projections as part of the development plan process. Further Guidance on the Preparation of a Housing Need and Demand Assessment (HNDA) was published on April 14<sup>th</sup>, 2021, issued under DHPLG Circular FPS04/2018, which will support the preparation of evidence-based housing strategies.

## **2.0 Issues Paper**

The Strategic Issues Paper identifies the following strategic themes; People and Place; Climate Action; Connectivity and Movement; Employment, Economy and Dublin Airport; Cultural Heritage; Green Infrastructure and Natural Heritage; Infrastructure and Utilities; and required Strategic Environmental Assessments, which are considered to provide a robust basis for scoping and developing the draft CDP.

This submission has detailed each of these themes in turn and consideration should be given to the observations and recommendations set out below in order to ensure consistency with the RSES.

### **2.1 People and Place**

The Assembly welcomes the inclusion in the Strategic Issues Paper of the regional policy context including the Figures 4.2 Settlement Strategy and 5.2 Dublin Metropolitan Area Strategic Plan of the RSES, which set the spatial framework to inform the preparation of the draft CDP. Also welcomed is the inclusion of an evidence-based profile of the County, and the recognition given to the role of placemaking in creating sustainable communities, which is reflective of Healthy Placemaking as one of three Key Principles in the RSES, supported by RSOs 1-5.

It is considered that the review of the draft CDP will allow for a holistic assessment of the Fingal settlement hierarchy using an evidence-based approach, and the core strategy will be required to demonstrate full consistency with the RSES in planning for future residential growth. The Asset Test for New Residential Development set out in Section 9.3 of the RSES may assist in this regard, see also the observations under Section 1.3 Compact Sustainable Growth and 1.4 Settlement Strategy.

#### **2.2.1 Sustainable Communities**

The Strategic Issues Paper sets out the need for compact growth, housing choice and a focus on enhanced placemaking and amenities to build resilience to the impacts of COVID-19 and create sustainable communities. The attention of the Council is drawn to Guiding Principles for 'Healthy Placemaking' set out in Section 9.4 of the RSES (Chapter 9 – Quality of Life), and in Section 8.3 for 'Integrated Land Use and Transport' (Chapter 8 – Connectivity), which will assist in planning for the provision of open space and recreation, and to promote the '10-minute settlement' concept whereby a range of services and amenities are accessible by walking, cycling or high-quality public transport.

The Local Economic and Community Plans (LECPs) and Local Community Development Committees (LCDCs) will also play a role in the provision of social infrastructure and ensuring social inclusion in planning for the diverse needs of current and future populations, as set out in RPOs 9.2, 9.18 and 9.19.

In terms of rural areas, Section 4.8 of the RSES recognises the contribution of rural towns, villages and the countryside to regional and national development and sets out policy objectives to promote rural regeneration and to manage urban generated growth in Rural Areas under Strong Urban Influence (i.e. the commuter catchment of Dublin, large towns and centres of employment) and Stronger Rural Areas, in order to ensure the integrity of rural areas and the viability of smaller towns and rural settlements. It is recommended that the County rural housing policy is aligned with RPOs 4.80 and 4.81, and NPO 19 of the NPF, and would benefit from inclusion of policy supports for the provision of serviced sites in small towns and villages as an alternative to one-off housing, in line with RPO 4.78 and NPOs 18a and 18b of the NPF to promote rural regeneration.

### 2.2.2 Impact of COVID

The draft CDP will need to address both short and anticipated long term impacts of COVID including an accelerated shift towards remote working, and potential reduction in work related commuting and to realise potential opportunities, including for the provision of co-working hubs and a greater mix of daytime and night-time uses to ensure vibrant urban centres. In the continued roll out of accelerated measures in response to COVID, local authorities should seek to ensure that short term measures support longer term objectives to improve walking, cycling and permeability and enhanced public realm.

In terms of town centre renewal, the Council is also directed to RPOs 6.12-6.14 which support the reuse of vacant spaces, shopfront improvements, enhanced public realm and placemaking initiatives to develop new and enhanced experiences in commercial centres and ensure the revitalisation and regeneration of towns and villages.

The Regional Assembly carried out analysis to identify urban centres most exposed to economic disruption from COVID-19, and to identify opportunities for co-working and remote working and these publications can be found on the Assembly website [www.emra.ie](http://www.emra.ie).

### 2.2.3 Housing

The RSES and the MASP set out policy objectives to promote increased residential densities and ensure the most efficient use of urban land, with a focus on planned population and housing growth in designated urban settlements and accelerated housing delivery on strategic development areas in the Dublin MASP, supported by improved services, amenities and sustainable transport.

RPOs 5.4 and 5.5 require local authorities to provide for higher residential densities and qualitative standards, in line with Ministerial Guidelines on 'Sustainable Residential Development in Urban Areas',

'Sustainable Urban Housing; Design Standards for New Apartments' and 'Urban Development and the Building Heights Guidelines for Planning Authorities' published in 2018 by DHPLG, which require planning authorities, in their statutory land use plans to identify areas for increased height and density, particularly in urban centres with high quality public transport, and the need to promote an effective mix of uses and more active land management.

The Council's attention is also brought to Section 9.3 Housing and Regeneration and RPOs 9.3 - 9.9, which support local authorities, approved housing bodies and other sectoral agencies, including the Land Development Agency in delivering a greater mix of housing type and tenure, including social and affordable and new models of cost rental, particularly on public lands. Also, of relevance RPO 4.2 promotes collaboration with infrastructure providers to ensure alignment of enabling infrastructure investment, and it should be noted that the MASP Implementation Group provides a forum for cross boundary and cross sectoral collaboration between infrastructure providers and local authorities to ensure a steady supply of serviced lands in the Dublin metropolitan area.

In preparing the draft CDP, the council will be required to undertake an assessment of the availability and capacity of future residential and regeneration development lands within the County and to ensure a plan led approach in co-ordinating and developing strategic landbanks based on the availability of services, land, and pattern of housing completion. Careful consideration will need to be given to the phasing and prioritisation of development lands, which can be delivered within the development plan period, and sequential lands which are suitable for the delivery of housing but may not be forthcoming in the plan period having regard to 2031 population targets. All future land subject to zoning shall undergo an infrastructure and deliverability assessment in line with NPF NPOs 72 (a), (b) and (c) and Appendix 3 of the NPF which sets out a tiered approach to land zoning.

It is recommended that the review of the CDP be accompanied and informed by an evidence-based Housing Needs Demand Assessment (HNDA), which will allow for more detailed consideration of housing supply targets and an appropriate mix of accommodation types and tenures, along with provision for social and affordable and specialist housing as required to meet the needs of current and future populations.

The comments in Section 1 'Ensuring Consistency with the RSES – Key Areas' will provide further guidance, in particular the need to deliver compact growth, to identify regeneration lands and ensure an adequate supply of land and housing to meet projected growth.

## **2.2 Climate Action**

The focus in the Issues papers on Climate is welcomed, in keeping with the RSES Key Principle on Climate Action, supported by RSOs 6-11. The Economic Strategy of the RSES also sets out policies to develop the low carbon and circular economy (RPO 6.23 refers) and accelerate a shift to renewable energy and secondary heat sources.



Also welcomed is the Council's adoption of the 'Fingal Climate Change Action Plan' 2019-2024, and the recognition of the role of the Dublin Metropolitan Climate Action Regional Office (CARO) in supporting Fingal achieve a transition to a low carbon society and economy.

It is recognised that the CDP will play a key role in the delivery of compact growth and sustainable development to reduce the Council's carbon footprint and address mitigation and adaptation requirements, including adaptation to flooding and coastal erosion which is addressed in Section 7.4 – Flood Risk Management and Section 7.2 - Integrated Land and Marine Planning of the RSES. In this regard, the Council should seek to integrate the principles of Integrated Coastal Zone Management and ensure consistency between the upcoming National Marine Planning Framework and the draft CDP.

Information contained at Chapters 4, 7, 8 and 10 of the RSES will also assist the Local Authority in developing an integrated climate policy, in particular Section 7.9 Climate Change and the related RPOs address the need for decarbonisation of the transport, built environment and energy sectors. The Council will also be required to designate 'decarbonising zone' under the Government's Climate Action Plan 2019, and to develop plans for flagship low carbon projects as part of their Climate Action Plans.

The review of the CDP offers an opportunity for further integration of sustainable transport policies, transition to low emissions and electric vehicles (EV) including local authority fleet, to support the roll out of EV charging infrastructure, and support mode shift to sustainable mobility including integration of key targets to increase walking and cycling and to reduce car-based commuting - and related transport emissions - in the Government's Smarter Travel Policy, as set out in Section 2.3 below.

The Council's attention is also drawn to accelerated climate action measures set out in the Climate Action and Low Carbon Development (Amendment) Bill, which commits Ireland to interim reductions in GHG emissions towards net-zero emissions by 2050. The new CDP will be required to include measures to assess and monitor progress on carbon reduction targets, in line with RPO 3.6 of the RSES. To this end, it should be noted that EMRA is leading an ESPON EU research programme (QGasSP) to identify a robust method for quantifying the relative GHG impacts of alternative spatial planning policies, the outputs of which may inform the review of the CDP.

## **2.3 Connectivity and Movement**

The RSES seeks to ensure the effective integration of transport planning with spatial planning policies, from regional to local transport plans and associated transport investment priorities while maintaining the capacity and safety of strategic transport networks, and achieve a shift to sustainable mobility.

Information contained in Chapter 8 - Connectivity will assist the Council in developing related policy including RPOs 8.1 and 8.4, which require that land use plans within the GDA demonstrate consistency with the NTA's Transport Strategy for the Greater Dublin Area (currently under review), and with the Guiding Principles for Integration of Land Use and Transport set out in Section 8.3 of the RSES.

The Assembly recognises that the sustainable growth of Fingal requires the provision of planned transport infrastructure as out in Tables 8.2 and 8.3 in the RSES and Section 5.6 in the MASP and welcomes that planning and design work is continuing key public transport projects, despite COVID-19 related impacts. Table 5.1 of the MASP sets out key enabling public transport projects including Metrolink, Bus Connects, DART + and LUAS expansion programmes, and the GDA Cycle Network.

The prioritisation of DART + West to Maynooth in the first phase of the DART + programme, will open new stations, improve interchange with other networks and serve strategic Dublin 15 development lands, while the expansion of DART Coastal + North will serve new communities at Baldoyle-Stapolin and Donabate. The delivery of Metrolink to serve Dublin Airport and Swords will also facilitate the future development of lands at Swords-Lissenhall, while the planned extension of the LUAS Greenline to Finglas will open potential for reintensification of brownfield lands along this route, terminating at Charlestown in Fingal, and to the major greenfield landbank at Dunsink. The delivery of cycling arteries in tandem with the delivery of Busconnects core bus corridors will further improve sustainable travel choices.

RSES supports key targets set out in the Government's Smarter Travel Policy to achieve a reduction in car-based commuting, as expressed in RPOs 5.2, 5.3, 8.7, 8.8 and 8.9, which require that future development be planned and designed in such a manner that facilitates sustainable modes of transport, with a particular focus on walking and cycling and the delivery of the Greater Dublin Area Cycle Network (Fig 5.3). The Assembly welcomes the progress that has been made in delivering the NTA cycle network to date and recommends early engagement with the transport agencies to ensure the integration of transport and land use in the upcoming CDP, and to promote behaviour change and demand management measures to help achieve this mode shift.

The Assembly also welcomes the progress that has been made in engaging with communities, schools, businesses, and other stakeholders to bring about mode shift in Fingal. The Assembly supports the continued roll out of public realm and active travel interventions in response to COVID-19, which should include provision for older people, people with disabilities and young children in line with the principles of universal design (RPOs 9.12 and 9.13 refer) and incorporate monitoring measures to inform the implementation of permanent solutions where clear benefits are identified.

## **2.4 Employment, Economy and Dublin Airport**

The Assembly welcomes the inclusion of an economic section as part of the Strategic Issues Paper. Economic Opportunity is one of the three key principles of the RSES which is linked to place-making and the promotion of strategic locations for new economic development that can attract and retain talent and investment and create sustainable jobs.

The Council's attention is drawn to Chapter 6 of the RSES, which deals specifically with Economy and Employment and Chapter 8 – Connectivity, which sets out priorities for International Connectivity. Of relevance, RPO 6.3 promotes the Dublin-Belfast Corridor as a key economic driver and RPOs 8.17 – 8.20

support improved access to and continued growth of Dublin Airport, recognising the role of the airport as a strategic national asset and a global gateway to trade and tourism markets.

In relation to sectoral employment opportunities Section 6.5 of the RSES, details specific sectors, such as Retail, Tourism, Marine, Low Carbon Economy and Agriculture which should be consulted in developing related plan policy. The Climate Strategy of the RSES also sets out policies to develop the low carbon and circular economy (RPO 6.23 refers) and the role of natural and cultural assets in developing enhanced tourism and leisure experiences is supported in RPOs 6.15 – 6.18 and RPO 6.8.

The RSES also recognises the importance of skills and innovation (RPOs 6.25 - 6.27), research and technology (6.29) and co-working / digital hubs (RPO 6.31) and supports the further development of smart city initiatives (RPO 6.30), building on the Smart Dublin initiative of the four Dublin local authorities. The three Regional Assemblies jointly published a Regional Co-working Analysis of the private sector in Ireland and mapped all existing co-working facilities, this publication can be found on the Assembly website [www.emra.ie](http://www.emra.ie).

To support inclusive growth, particularly in deprived or underperforming areas the RSES sets out policies that seek to improve skills, diversify local economies and promote SMEs and indigenous enterprise. RPOs 6.31 and 6.32 recognise the key role played by enterprise agencies, Regional Skills Fora, LCDCs and Local Enterprise Offices (LEOs) in stimulating a pipeline to sustain inclusive growth including support for start-ups, SMEs and social enterprises. It should be noted that the Fingal Local and Economic Community Plan (LECP) will require review in light of the adoption of the RSES, and the Council should seek to ensure consistency in this regard between the LECP, the CDP and the RSES.

#### **2.4.1 Spatial Distribution of Employment Lands**

The RSES includes for the first time in Irish regional planning an economic plan that is intrinsic to a spatial plan, which promotes economic development as part of an orderly growth strategy. To this end, the identification of locations for strategic employment development in the draft CDP should be consistent with the settlement hierarchy in the RSES and be informed by an evidence-based assessment of the location, quantum, density and capacity of existing and any future proposed employment zoned lands, in order to meet current and future employment needs.

The Councils attention is drawn to Guiding Principles for the location of strategic employment and investment prioritisation (Section 6.3) which include access to; suitable locations (depending on whether an enterprise is people or space intensive); serviced sites (energy, water, transport, communications networks); connectivity (including access to international markets via an airport/port); skilled labour force (proximity to third level and lifelong learning) and; local strengths (a diverse sectoral mix, research and technology centres, start-up incubators, emerging clusters or value chains).

Guiding Principles for the MASP (Section 5.3 refers) support increased employment densities near high quality transport nodes and services, third level institutions and existing employment hubs within the

Dublin metropolitan area, including large scale office, research and development and high-tech manufacturing at Dublin Enterprise Zone, and future employment locations and airport related and commercial facilities in Swords and Dublin Airport/South Fingal, as set out in Table 5.2.

#### **2.4.2 Retail**

In terms of retail development, the Council's attention is drawn to the retail hierarchy for the Region as presented in Table 6.1 of the RSES, which designates Dublin city centre as the top tier in the Retail Hierarchy, supported by the Level 2 Major Town Centres of Swords and Blanchardstown, and the Level 3 District Centres of Malahide, Balbriggan, Skerries and Charlestown. The designation of lower tier centres will be a matter for consideration by local authorities, and the draft CDP should also include objectives to support placemaking initiatives and town centre renewal in line with RPOs 6.12 - 6.14 of the RSES and the 'Town Centre First' policy in the Programme for Government.

While the need for the preparation of a new retail strategy for the Region is recognised in the RSES (RPO 6.10 refers), it should be noted that RPO 6.11 of the RSES requires that future provision of significant retail development shall be consistent with the Retail Planning Guidelines for Planning Authorities 2012, or any subsequent update, and the retail hierarchy for the Region, expressed in the RSES, until such time as this hierarchy is updated.

Guiding Principles for Integration of Transport and Landuse also require the location of trip intensive developments such as large-scale retailing in accessible locations well served by high quality public transport.

### **2.5 Cultural Heritage**

The Strategic Issues paper highlights the wealth of cultural heritage in Fingal, which comprises both built and intangible heritage and that will require effective management and protection, while ensuring the continued development of the County.

The RSES emphasises that good heritage management should be incorporated into spatial planning to promote the benefits of heritage led urban regeneration in historic towns, for example through the protection of historic urban fabric, the reuse of historic buildings and the enhancement of places of special cultural or natural interest. Section 9.7 of the RSES and its related RPOs 9.24 to 9.30 highlight the role of built heritage in creating a sense of place and enabling regeneration of urban areas.

It is recognised that Fingal's archaeological sites, its historic houses, demesne landscapes and coastline, play a key role in driving tourism and economic development in terms of placemaking, enhancing the vibrancy of historic town centres and driving heritage led regeneration. Section 9.7 of the RSES and its related RPOs 9.24 to 9.30 provide guidance which should assist in developing plan policy in this area.

Section 9.7 of the RSES and its related RPOs 9.24 to 9.30 also emphasise the role of arts, language and culture in providing a distinctiveness of place, and in defining Ireland's unique identity and international profile, also providing significant economic benefits in terms of creative industries, in particular the audio-visual sector and cultural tourism, which is a central plank of the Irish Tourism industry.

The impact of Covid-19 on the arts and culture sector has been severe, and the review of the CDP provides an opportunity to consider policies to support existing cultural and community spaces, institutions, events and festivals, and to explore new opportunities for a wide range of communities to engage with cultural heritage.

## **2.6 Green Infrastructure and Natural Heritage**

The Assembly welcomes the inclusion in the Strategic Issues paper to the role of Green Infrastructure in protecting and enhancing biodiversity and people's quality of life and recognises the good practice by Fingal in developing Green Infrastructure policies and mapping in the County.

The Council is directed to the Guiding Principles for Green Infrastructure (Section 7.7 refers) and for Sustainable Urban Drainage (Section 10.2 refers) and Guiding Principles for Healthy Placemaking and the provision of recreation and open space facilities (Section 9.4 refers) in the RSES.

The Assembly welcomes progress in developing Fingal's Ecological Network and environmental management initiatives. As a partner on the Interreg Europe PROGRESS project, EMRA has engaged with key stakeholders to facilitate the integration of ecosystem services into policy and plan making and share best practices such as the National Ecosystem and Ecosystem Services Mapping Pilot (NEES) and support the delivery of strategic Green Infrastructure in the Region. The outputs of the project as it progresses, may inform the integration of Green Infrastructure and Ecosystem Services Mapping into the upcoming CDP, in line with RPOs 7.21 – 7.23 of the RSES.

The Assembly also welcomes progress in developing regional parks and amenities and highlights significant opportunities to further develop Strategic Green Infrastructure (Table 7.1 refers) and Strategic Greenway Networks (RPOs 5.7, 5.8, 7.24 and 7.25 refer) including the Fingal Coastal Way as part of the wider East Coast Trail, subject to careful routing and design to ensure the protection of environmentally sensitive sites.

The Assembly also supports the development of improved visitor experiences, nature conservation and sustainable development activities within the Dublin Bay UNESCO Biosphere as set out in the RPO 7.20 of the RSES.

## **2.7 Infrastructure and Utilities**

The Regional Assembly welcomes the Council's commitment to the provision of high-quality infrastructure and utilities in a plan led manner to ensure that there is adequate capacity to support

future development. Information contained in Chapter 5 – MASP and Chapter 10 - Infrastructure will assist in developing related policy in particular Tables 10.1 and 10.2 which set out strategic water/wastewater infrastructure projects.

In this regard it should be noted that the Water Supply Project for the Eastern and Midland Region will be critical to ensure long term security of water supply in the Region, and the construction of the Greater Dublin Drainage Project including a new treatment plant at Clonshaugh, is also identified as key enabling wastewater infrastructure.

It is welcomed that the draft CDP will include measures to ensure that water, air and noise management accord with relevant EU and national legislation and the Assembly recommends early engagement with the relevant agencies, including Irish Water in this regard. The Eastern Midlands Region Waste Management Plan will also inform waste policies within the upcoming CDP and support a move towards a more resource efficient circular economy and bioeconomy, as set out in RPOs 7.34 and 10.25 of the RSES.

The Strategic Issues Paper also refers to the need for high quality ICT and energy networks. The Council's attention is drawn in this regard to Sections 8.6 which deals with communications and digital infrastructure (RPOs 8.25 and 8.26 refer) including support for the promotion of the Dublin Region as a test bed for future connected networks.

The Assembly also welcomes the recognition in the Issues Paper to energy planning (RPOs 10.19 to 10.24 refer) including the need for reinforcement of the Greater Dublin Area's transmission network enabling the promotion of renewable energy sources including offshore renewable potential, and to strengthen interconnections to the UK and Europe. The Council is further directed to Section 10.3 'Energy' and the Guiding Principles, which set out guidance to support the provision of EV charging infrastructure, roll out of smart grids, potential for district heating zones and the identification of Strategic Energy Zones suitable for larger waste energy generating projects.

## **2.8 Strategic Environmental Assessment, Appropriate Assessment and Strategic Flood Risk Assessment**

The Assembly welcome the statement in the Strategic Issues Paper that the preparation of the draft CDP will be carried out in tandem with the required environmental processes, namely Strategic Environmental Assessment and Appropriate Assessment as well as Strategic Flood Risk Assessment. The Assembly recommend early engagement with the relevant bodies in this regard, including the Office of Public Works, Department of Housing, Local Government and Heritage, the National Parks and Wildlife Service, the Environmental Protection Agency and Irish Water.

The review of the CDP and parallel environmental processes offers an opportunity for the integration of sustainable development targets and climate action obligations, including assessment of greenhouse

gas emissions in accordance with RPOs 3.6 and 3.7 of the RSES. See also the observations in relation to Climate Action set out in Section 2.2 of this submission.

As detail is developed in the preparation of the CDP, further focused environmental assessment will be required, including Strategic Flood Risk Assessment (SFRA) as set out in RPO 7.12 of the RSES. RPO 7.15 also states that Local Authorities shall take opportunities to enhance biodiversity and amenities and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned. Furthermore, riparian setbacks should be achieved where appropriate, as set out in RPO 7.26. It is recommended that the Council take into account the need to identify risks and ensure the resilience of critical infrastructure, as set out in RPO 7.43 of the RSES and shall also note the provisions of the National Adaptation Framework 2018 in this regard.

### 3.0 Conclusion

The Regional Assembly welcome the publication of the Issues Paper which marks the beginning of the alignment of planning policy at county and local levels with Regional and National Policy. The Assembly look forward to corresponding with the Council on the forthcoming stages of the County Development Plan process.

It should also be noted that the officials of the Regional Assembly are available to discuss the matters raised above and will be available throughout the County Development Plan process.

Regards,



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Jim Conway, Director  
Eastern and Midland Regional Assembly  
16<sup>th</sup> April, 2020.