



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

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South Dublin Draft County Development Plan 2022 – 2028

The Eastern and Midland Regional Assembly (EMRA) notes the publication of the Draft South Dublin County Development Plan (CDP) 2022-2028 along with the subsequently published Errata to the Draft CDP in August 2021 and sets out hereunder submissions and observations on behalf of the Assembly. This submission has been reviewed by the executive and approved by the members of the Assembly at the plenary meeting of 10th September 2021.

Regional Spatial and Economic Strategy (RSES) 2019-2030

As indicated in the Assembly's previous submission to the County Development Plan review process made under Section 27A of the Planning and Development Act 2000, as amended (hereafter referred to as 'the Act'), The Council will be aware of the finalisation of the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midland Region, made on 28th June 2019, which consequently initiated the statutory time period within which the Council are required to prepare their Draft Development Plan, as stated at Section 11(1) (b) of the Act. In this regard, The Assembly welcomes the publication of the Draft South Dublin County Development Plan which enables the coordinated and timely incorporation of Project Ireland 2040 - the National Planning Framework (NPF) and the Regional Spatial and Economic Strategy (RSES), thus ensuring full alignment between local, regional, and national planning policy.

Legislative Context

As required by Section 27B of the Act, The Eastern and Midland Regional Assembly has prepared this submission and sent a copy of same to the Minister and Office of the Planning Regulator.

In accordance with the Act, a submission shall contain a report which shall state whether, in the opinion of the Regional Assembly, the draft development plan, and in particular its core strategy is consistent with the Regional Spatial and Economic Strategy. If, in the opinion of the Regional Assembly the draft development plan, and its core strategy are not consistent with the RSES, the submission / observations and report shall include recommendations as to what amendments, in the opinion of the Regional Assembly, are required to ensure that they are consistent. 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 27B of the Act.

The attention of the Council is also directed to the requirements of Section 12 (4) of the Act, whereby a Chief Executive's Report prepared by the Planning Authority shall summarise the issues and recommendations raised by the Eastern and Midland Regional Assembly and outline the recommendations of the Chief Executive in relation to the manner in which those issues and recommendations should be addressed in the development plan.

Submission

The Assembly would like to acknowledge the extensive work that the Local Authority has carried out in preparing the Draft County Development Plan (CDP) and that this work follows a period of considerable change within a planning policy context, that included the publication of the National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES) and the establishment of the Office of the Planning Regulator (OPR). Accordingly, the Assembly welcomes the overall approach and effort of South Dublin County Council to coordinate and incorporate policies and objectives, so that they are consistent with the RSES and NPF.

The Assembly considers that the overall Draft South Dublin County Development Plan (CDP), including its core strategy, are consistent with the RSES subject to the observations and recommendations of this submission, which broadly follows the chapter headings of the Draft CDP, which are considered to provide a robust framework for the development of an overall strategy for the proper planning and sustainable development of the County.

This submission sets out the following sections:

1. Introduction, Strategic Vision and Climate Action
2. Core strategy and Settlement Strategy
3. Heritage and Green Infrastructure
4. Housing, Placemaking and Neighbourhoods
5. Sustainable Movement
6. Economic Development and Employment
7. Energy and Environmental Infrastructure
8. Implementation and Environmental Reports

1.0 Introduction, Strategic Vision and Climate Action

The introductory chapter of the Draft County Development Plan (CDP) sets out a profile and overall Vision for the County, which is for a ‘vibrant and inclusive place for the people who live, visit, work and do business’ and is informed by the core strategy and population targets set for the County.

The chapter also sets out the statutory framework and planning hierarchy which informs the Draft CDP with reference to relevant policy parameters in Project Ireland 2040 - the National Planning Framework (NPF), the Regional Spatial and Economic Strategy (RSES), the Dublin Metropolitan Area Strategic Plan (MASP), the UN Sustainable Development Goals, and relevant government policies and Ministerial Guidelines. This is welcomed in support of the required alignment between local, regional and national planning policy, as required by Section 10 (2) of the Act.

The Assembly welcomes that Climate Action is identified as a significant challenge with climate policies and ‘Climate Positive Objectives’ integrated in a holistic way throughout the CDP and aligned to the South Dublin Climate Action Plan 2019-2024. Similarly, the Draft CDP has been assessed against its impact on the receiving environment through the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) Processes and subject to Strategic flood Risk Assessment (SFRA).

2.0 Core strategy and Settlement Strategy

This Chapter sets out the settlement and growth strategy that will guide the development of the County, which is required to be consistent with NPF and RSES and any Section 28 Guidelines of the Government. The Assembly welcomes the inclusion in Appendix 1 of a Statement of Compliance demonstrating how South Dublin County Council has implemented the relevant policies and objectives of Section 28 Guidelines of the Minister in the Draft CDP and setting out a full list of National and Regional Planning Policy Objectives of the NPF and RSES.

The Assembly acknowledges that the publication of new Ministerial Guidelines will create challenges for local authorities where development plan review processes are underway. In this regard, EMRA notes the publication by the Department of Housing, Local Government and Heritage (DHLGH) of Section 28 Guidelines 'Housing Supply Target (HST) Methodology for Development Planning' in December 2020, and more recently in August 2021, the Draft Guidelines for Development Plans and accompanying Circular 04/2021 which states that *"it is intended that planning authorities would have regard to the Draft Guidelines, noting that many development plan review processes are currently underway and are at different stages of completion."*

The Assembly also acknowledges and commends the considerable work undertaken by South Dublin to inform the preparation of an evidence-based Core and Settlement Strategy, which includes the preparation of a Land Capacity Analysis, Infrastructural Assessment, Planning Assessment and Settlement Asset Based Analyses, as set out in the Appendices of the Draft CDP.

In accordance with the requirements of Section 10 (2A), (2B) and (2C) of the Act, the core strategy and Settlement Strategy is set out in the Written Statement of the Draft CDP and presented in Table 10 - Core Strategy Table, which sets out the distribution of zoned lands and population and housing targets in the County and in Figure 10 – Core Strategy Map, which visually represents the County Settlement Hierarchy and designation of settlements within that hierarchy.

The core strategy is generally considered to provide a robust framework in demonstrating consistency to national and regional population targets and in identifying future growth opportunities in co-ordination with transport and infrastructure delivery to achieve compact sustainable development, in line with the RSES, subject to the observations and recommendations set out below.

2.1 Population projections

To inform the core strategy, the Draft CDP highlights historical growth trends whereby South Dublin County has experienced population growth of c.16.7% between 2002 and 2016 with a total population of 278,767 people and housing stock of 94,892 units in 2016.

The Draft CDP also details the policy framework in the NPF Roadmap issued under DHPLG Circular FPS04/2018 and Appendix B of the RSES (SPA and County Population Tables), which sets out population projection targets in the County of 314,000 to 2026 (high) and 329,000 to 2031 (high).

Table 4 translates the County population projections in the RSES into a population target for the development plan period 2022-2028, based on a pro rata rate between 2026-2028. This is stated to be comparative to previous population growth trends up to 2016. Section 2.5.6 sets out population and housing requirements based on an average household size of 2.74 persons per house, which is stated to be in line with the projected reduction in household size to 2.5 by 2040 as set out in the NPF.

Table 10 Core Strategy Table 2022- 2028, projects a total population of 325,285 or an additional 46,518 persons by 2028, which is consistent with the NPF Roadmap and RSES Appendix B (high). It is considered that the application of RSES 'High' population growth scenario is appropriate in the context of achieving compact sustainable growth in existing built-up urban areas, and to support the implementation of the Dublin Metropolitan Area Strategic Plan (MASP) and it is recommended that a statement of justification for same should be included in the core strategy.

Based on monitoring of activity since 2016, it is noted that housing delivery has not kept pace with projected demand resulting in 'pent-up' demand in the County. This is addressed in Section 2.2 below.

2.2 Housing Demand and Supply Targets

The Draft CDP sets out an evidence-based analysis of planning and construction activity and housing delivery based on CSO dwelling completions, Building Control Management System and Dublin

Housing Task Force data. The Draft CDP also details the policy framework within which development plan housing demand and supply targets were determined including Part V of the Planning Act and the Section 28 Guidelines on Housing Supply Target (HST) Methodology for Development Plans and accompanying ESRI Regional Demographics and Structural Housing Demand research.

Based on a deliverability analysis, it is estimated that c5,900 housing units were built up to 2016 and that roughly half of sites with extant planning permission in the County have not commenced since 2016. The annual average rate of c1,500 units constructed between 2017 and 2020 is stated to be below the projected annual average demand for the County in the ESRI NPF scenario in the HST Guidelines resulting in pent up demand for housing in the County.

Table 10 Core Strategy Table projects a total housing stock of 118,632 houses by 2028 and a target of 17,817 additional units between 2021-2028, with specific calculations set out in Table 7 and in Appendix 2 of the Draft CDP. The housing supply target for the plan period has been determined in line with Section 28 Guidelines 'Housing Supply Target (HST) Methodology for Development Planning'.

The housing policies in the Draft CDP are also informed by an evidence based 'Housing Strategy and Interim Housing Need and Demand Assessment (HNDA)' set out in Appendix 11, as required by National Policy Objective (NPO) 37 of the NPF. The Assembly note the publication on 14th April 2021 by DHLGH of HNDA Guidelines and Circular 14/2021 which states that HNDA is to be integrated into development plan review process that commence after this date. The Circular also states that where development plans are being formulated currently, as in South Dublin, that Section 28 Guidelines on a HST Methodology will facilitate decisions regarding new housing supply targets for the plan period, to be determined in advance of the full integration of HNDA methodology into the Housing Strategy.

Having regard to the above, it is considered that the 'Housing Strategy and Interim HNDA' provide a robust evidence-based framework to inform the housing policies in the Draft CDP including requirements for specialist provision and social and affordable housing, subject to the publication of any future revised 'Housing Strategy' Guidelines under Section 28 that may require further housing need and demand assessment to be taken into account.

The analysis presented in the 'Draft Housing Strategy and Interim HNDA' indicates a low incidence of single housing in the countryside. Policy CS11 of the core strategy implements a Rural Settlement Strategy supported by rural housing policy objectives in Section 6.9 Rural Housing Strategy to manage one-off housing in rural areas under strong urban influence for housing, as required by the NPO 20 of the NPF and the Sustainable Rural Housing Guidelines for Planning Authorities.

Further detail on housing policies in Chapter 6: Housing is addressed in Section 4.0.

2.3 Land Capacity and Zoning

In formulating the core strategy, South Dublin have undertaken a land capacity and planning analysis to assess the capacity of existing zoned undeveloped land to accommodate residential development and achieve the housing target in the core strategy. Based on the analyses, it is stated that there is no requirement to zone any additional lands in the Draft CDP.

The Assembly welcomes the inclusion in Appendix 2 Parts 1 (B) and (C) of the Draft CDP of a detailed 'Infrastructure Assessment' and 'Planning Assessment' which respectively set out a detailed appraisal of enabling infrastructure requirements, and of key assets and development potential in the County and neighbourhood areas of; Citywest, Saggart and Newcastle; Clondalkin, Clonburris and Grangecastle; Lucan, Palmerstown and Adamstown; Naas Road; Tallaght; Templeogue, Walkinstown, Rathfarnham and Firhouse. Also welcomed is the stated focus in the Draft CDP on the delivery of Strategic Development Areas (SDAs) set out in the Dublin MASP.

Table 9 sets out the overall land capacity (477 ha) and potential housing yield (23,730 units) of existing undeveloped zoned lands in the County based on an average density of 50 units/hectare, presented by settlement and greenfield/brownfield sites. This excludes units built and under construction since 2016 based on construction trends and deliverability analysis that estimate approximately half of extant permissions being activated at any given time. The estimated land capacity excludes long term Strategic Development Areas (SDZs & major regeneration 'REGEN' sites) in line with Section 4.4.4 of the Draft Development Plan Guidelines which allows for strategic long-term site that will be developed beyond the plan period to be considered additional to the core strategy zoning provision.

2.3.1 Tiered Approach to Land Zoning

The overall land capacity of 477 hectares (ha) of undeveloped zoned lands are all classed as either serviced (Tier 1-196 ha) or serviceable (Tier 2 – 281 ha) lands in alignment with NPO 72a and Appendix 2 of the NPF based on the infrastructural assessment in the Draft CDP. All lands are stated as being capable of delivering residential development within the life of the CDP. A planning assessment further identifies 343 ha of these lands with the highest planning score in terms of their ability to deliver sustainable compact growth in line with the strategic outcomes of the NPF and RSES.

It is noted that the estimated potential housing yield of existing zoned lands is above what is required to exactly match the housing supply target (HST) for the plan period, and that this is justified in the Draft CDP on the basis of ensuring an adequate supply of zoned lands and to provide for a degree of flexibility in which lands come forward within the lifetime of the Plan. In this regard it is noted that the Dublin MASP also recognises the need for a flexible planning response to address complexities in achieving compact growth, and states that core strategies of development plans relevant to the MASP should have a focus on the delivery of sites in the MASP while retaining flexibility to respond to new and future opportunities for the delivery of housing, in line with the NPF Roadmap and a robust evidence-based analysis of demand, past delivery and potential.

It is considered that the core strategy will provide for sufficient zoned lands to meet the projected population and housing targets for the County and ensure a scarcity of suitable lands for residential development does not occur during the development plan period, subject to the application of prioritisation measures where a surplus of zoned land is identified with regard to the NPF Implementation Roadmap and a tiered approach to land zoning.

It is also noted that the Draft Development Plan Guidelines (Section 4.4.3 'Ensuring Sufficient Provision for Housing Lands/Sites') state *"it may be necessary to zone more serviced land and sites for residential (or a mixture of residential and other uses), than would equate to meeting precisely the projected housing demand"* to ensure sufficient choice for development potential and sets out criteria for 'Additional Provision' of zoned lands that must be phased and prioritized.

In this regard, it is acknowledged that South Dublin have already undertaken an infrastructural and planning assessment to inform order of priority of planned development lands, and it is recommended that the core strategy should clearly set out the proposed phasing of development lands and demonstrate a clear sequential approach in line with RPO 5.5 of the RSES, with a primary focus on the consolidation of Dublin and suburbs and on the delivery of Strategic Development Areas (SDAs) set out in Table 5.1 in the MASP.

2.4 Settlement Hierarchy

The Assembly commends the Council for undertaking an evidence-based analysis of settlements in the County in accordance with the RSES Asset Based Methodology, to inform the designation of settlements in the County Settlement Hierarchy, which generally reflects the RSES Settlement Hierarchy, designating 'Dublin city and suburbs' including the majority of the urban footprint of South Dublin at the top tier, supported by the planned development of lower tier 'Self Sustaining Growth

Towns/Self Sustaining Towns’ and managed growth in the rural areas of the County, at the bottom of the hierarchy.

It is noted that ‘Self Sustaining Towns’ are listed above ‘Self Sustaining Growth Towns’ in core strategy Tables 9, 10 and 12 and it is recommended that the order of presentation of these settlement tiers be switched around to reflect their relative position in the Settlement Hierarchy, as set out in Table 13 of the Draft CDP and to ensure consistency with the RSES Settlement Hierarchy.

2.4.1 Dublin city and suburbs

Table 12 - Core Strategy Population sets out the allocation to Dublin city and suburbs of 90.5% of the total population growth to 2028 in the County, equating to an additional c42,100 people or 16% growth rate over the 2016 census baseline, which is consistent with national and regional strategic outcomes to deliver compact growth within the existing built footprint of Dublin city and suburbs¹.

Table 10 sets out the breakdown of planned development in the neighbourhood areas/settlements of; Tallaght; Naas Road; Templeogue, Walkinstown, Rathfarnham and Firhouse; Clondalkin, Clonburris and Grangecastle; and Citywest. The core strategy clearly sets out and quantifies the development potential of neighbourhood areas/settlements that are located within the city and suburbs boundary, as separate to those urban areas that are located outside the built-up area, and this is welcomed.

The Assembly also welcomes the focus given to the development of key urban centres within Dublin city and suburbs as set out in Section 2.7.1 of the Draft CDP and directs the Council to Table 5.1 of the MASP, which identifies a sequence of key enabling transport and infrastructure to enable the delivery of strategic residential development areas of Naas Road/Ballymount, Adamstown and Clonburris SDZs, Lucan, Clondalkin, Fortunestown and Tallaght, within South Dublin.

Table 9 sets out the further breakdown of undeveloped zoned lands within Dublin city and suburbs by greenfield and brownfield sites. Although a majority of greenfield lands are identified, the Assembly acknowledge that a significant proportion of these greenfield lands are designated for planned development in the Strategic Development Zones (SDZs) of Adamstown and Clonburris and also due to their location within Dublin city and suburbs are considered to be consistent with compact growth targets set out in RPO 3.2 of the RSES and NPO 2a of the NPF.

2.4.2 Self Sustaining Growth Towns

The County Hierarchy identifies Newcastle and Rathcoole as ‘Self-Sustaining Growth Towns’, defined in the RSES Settlement Hierarchy as towns with a moderate level of jobs and services, including sub county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining.

The core strategy allocates 8.6% of the total population growth in the County to these two towns reflecting a graded approach in the settlement hierarchy. The core strategy also sets out population increases to 2028 of 1,946 persons up to c5,000 population in Newcastle (+63%) and 2,058 persons up to c6,400 population in Rathcoole (+47%), both of which are above the significant growth rate threshold set out in NPO 9 of the NPF.

It is noted that units built, under construction and extant permissions account for a significant proportion of the allocated population growth in these settlements and that these will need to be taken into account in the core strategy. Nevertheless, it is further recommended that a clear rationale be set out for the designation of these settlements as growth towns having regard to past and current trends of rapid commuter- focused population growth, low jobs to resident workers ratio indicating a weak employment base and the need for ‘catch up’ investment in these towns, that would suggest a more appropriate designation as ‘Self-Sustaining Towns’.

¹ Dublin city and suburbs boundary is defined by the Central Statistics Office (CSO) in the Census of Population.

Notwithstanding the above, It is acknowledged that there is potential to increase local employment options having regard to the proximity of extensive zoned employment lands to the west of Dublin and in particular that Newcastle has potential to become more self-sustaining through the continued provision of commensurate social and physical infrastructure in tandem with phased residential development in the Newcastle Local Area Plan (LAP), and the planned extension of high frequency rail services to Cellbridge-Hazelhatch as part of DART + South West Programme .

There are significant remaining zoned undeveloped lands in the two towns without planning permission the majority of which comprise greenfield lands as evidenced by Table 9 and it is further recommended that a phased approach be taken in the development of these lands in line with the recommendations of the NPF and RSES, as outlined in Section 2.3 above.

2.4.3 Self Sustaining Towns

The County Hierarchy identifies Saggart as a ‘Self-Sustaining Town’, defined in the RSES as towns with a high level of population growth and a weak employment base that are reliant on other areas for employment/services and require targeted ‘catch up’ investment to become more self-sustaining.

The core strategy allocates 0.9% of the total population growth in the County to Saggart setting out a population increase of 396 persons up to c3,500 population (+12.7%) to 2028, which is below the significant growth threshold set out in NPO 9.

It is considered that the proposed designation is appropriate having regard to past trends of rapid population increase and will promote ‘catch up’ investment in local employment, services and sustainable transport options to enable Saggart become more self-sustaining.

2.4.4 Rural areas

The ‘rural’ footprint of South Dublin includes the rural and high amenity areas in the Dublin Mountains and Liffey and Dodder Valleys which are under strong urban pressure for housing. The core strategy supports implementation of the Rural Settlement Strategy in Chapter 6: Housing of the Draft CDP.

The core strategy allocates 0.1% of the total population growth in the County to rural areas, equating to an increase of 27 persons (+0.5%) and a rural population of c.5,600 persons up to 2028, setting out policies to manage the spread of urban-generated housing as required by the ‘Sustainable Rural Housing – Guidelines for Planning Authorities’ (2005) and in line with NPO 15 and NPO 19 of the NPF.

2.5 Monitoring/Active Land Management

The Assembly welcomes the commitment given in the core strategy to monitor growth at a settlement scale and to pursue active land management measures provided for under legislation including the Vacant Sites levy, Derelict Sites Act and Compulsory Purchase Orders.

The Council have also been proactive in identifying and designating strategic regeneration (REGEN) lands and Strategic Development Zones (SDZs) to unlock strategic development lands and compact forms of development and have been successful in securing significant draw down of Project Ireland 2040 Urban Regeneration and Development Funds along with other initiatives and funding opportunities for the County.

2.6 Employment lands

The Assembly welcomes the evidence-based approach as part of the core strategy which sets out a baseline analysis for the existing available 624 hectares (ha) of employment lands which are stated to have the potential to generate c31,800 jobs. The Draft CDP sets out a target of creating an annual average of c.1,500 additional jobs up to 2028.

In addition to employment zoned lands there are a further 425 ha of existing Regeneration (REGEN) zoned brownfield land forming part of the Tallaght Town Centre LAP and Naas Road area, to

accommodate higher density employment through a mix of uses and more compact forms of development. It is noted that the Naas Road/Ballymount lands, which crosses the administrative boundary with Dublin city council, is one of the largest regeneration areas in Europe and will be subject to a joint Framework Plan between the two authorities.

The development of REGEN lands will support RPO 5.5 of the RSES that promotes a sequential approach with a focus on the re-intensification of employment lands within the M50 and at selected strategic development areas in the metropolitan area in tandem with the provision of high-quality public transport. Based on the need to provide additional jobs in the County and maintain existing jobs through the potential re-location of some business from the brownfield lands at Tallaght and Naas Road, the available capacity of employment is stated to be sufficient, and it is not proposed to rezone any additional employment lands in the Draft CDP.

Having regard to the above it is considered that the core strategy will provide for sufficient serviced lands for employment to support projected employment growth within the plan period. The Regional Assembly considers the location of strategic employment lands in the Draft CDP is consistent with the Settlement Hierarchy in the RSES and MASP and could be further strengthened by reference to the delivery of strategic employment development lands in Tables 5.1 and 5.2 of the MASP, including Naas Road/Ballymount, Tallaght Town Centre/Cookstown and Grange Castle Business Park in South Dublin.

Further detail is set out in Section 6.0 Economic Development and Employment.

2.7 Climate Action

The Climate Audit set out in the core strategy contains policies to reduce climate impact by promoting sustainable settlement patterns whereby the location of people and jobs is promoted in proximity to high capacity of public transport and aligned to the Greater Dublin Area (GDA) Transport Strategy in order to reduce the need for unnecessary private car journeys – and associated emissions.

The delivery of compact growth will play a key role in climate action preventing urban sprawl and the resultant negative impact on the environment and biodiversity. The core strategy sets out projections for 92% of planned population growth to take place within and/or contiguous to the Dublin city and suburbs boundary and 71% of planned growth within the MASP Strategic Development Areas. The Draft CDP also supports nature-based solutions and incorporates an eco-systems approach to protect sensitive and designated sites.

The Assembly welcomes the inclusion of dedicated Climate Audits in each Chapter of the Draft CDP as part of a holistic and integrated approach in demonstrating how different policy areas contribute to Climate Change Adaptation or Mitigation, and further observations in this regard are set out in the relevant sections of this submission.

The Council's attention is also drawn to accelerated climate action measures set out in the Climate Action and Low Carbon Development (Amendment) Bill, published in October 2020, which commits Ireland to interim reductions in GHG emissions including an average 7% per annum reduction from 2021 to 2030 towards net-zero emissions by 2050. The Regional Assembly are currently leading the QGasSP ESPON EU research project to develop a robust methodology for quantifying the GHG impacts of spatial planning policies, which may provide further guidance in this regard.

In conclusion, it is considered that the Core and Settlement Strategy of the Draft CDP is informed by robust evidence-based assessment and makes provision for an adequate supply of zoned land and housing to meet projected population growth in the County, with a focus on sustainable compact growth in line with strategic objectives of the NPF and RSES, subject to addressing the observations and recommendations of the Assembly and demonstrating general consistency with relevant Section 28 Guidelines.

3.0 Heritage and Green Infrastructure (GI)

The Assembly welcome the inclusion in the Draft CDP of policies and objectives to protect and enhance the County's unique Natural Cultural and Built Heritage (Chapter 3) and Green Infrastructure (Chapter 4), which is supported by the implementation of the County Heritage Plan and the Biodiversity Action Plan and the identification of key designated sites and sensitive areas on development plan maps.

Chapter 3 includes specific objectives and guidance relating to the protection of the County's archaeological and architectural heritage, setting out a description of Architectural Conservation Areas (ACAs), a full list of Record of Protected Structures in Appendix 3A and Monuments and Places in Appendix 3B of the Draft CDP, and policies to manage development in line with the Architectural Heritage Protection Guidelines and other relevant policy documents.

There are also policy objectives to promote architectural conservation and heritage led regeneration, including reuse of historic buildings and energy retrofitting, which can play a key role in driving economic development in terms of placemaking and enhance the vibrancy of historic town and village centres. Chapter 3 also seeks to protect and enhance European designated areas, proposed Natural Heritage Areas, Areas of Significant Amenity Value, Special Amenity Areas, Tree Preservation Orders, Geological Sites, Landscape Character Areas and Views and Prospects in the County.

The Assembly welcomes the inclusion of a dedicated Chapter 4 on Green Infrastructure (GI) and Appendix 4 Green Infrastructure Local Objectives and Case Studies and the recognition given to GI as a key strategic asset for the County, which can deliver multiple environmental, social and economic benefits. Also welcomed is the integration of an Ecosystem Services Approach and GI policies across the strategic themes of Biodiversity, Sustainable Water Management, Climate Resilience, Recreation and Amenity and Landscape and Heritage, which is considered to provide a robust framework for the development of the County GI Strategy as presented in Figure 4.4 of the Draft CDP.

The Dublin MASP identifies key GI assets within the Dublin Metropolitan Area, including the Dublin/Wicklow Mountains, River Dodder, the Liffey Valley Special Amenity Area and Tymon Park, in South Dublin all of which are incorporated into the GI Strategy which will support the development of Strategic GI networks in the County in Figure 4.3 of the Draft CDP. The Assembly commends the commitment of South Dublin to GI and supports the Council in facilitating the integration of ecosystem services into local policy and plan making, in line with the policy objectives of the RSES and MASP.

4.0 Housing, Placemaking and Neighbourhoods

The Assembly welcome the inclusion in the Draft CDP of policies and objectives to promote Quality Design and Healthy Placemaking (Chapter 5) and the delivery of Housing (Chapter 6) to meet a range of diverse needs in the County, in tandem with the provision of Community Infrastructure and Open Space (Chapter 8) and to create sustainable communities as set out in Neighbourhoods (Chapter 12).

4.1 Housing

The Assembly acknowledges the work that has gone into the preparation of the 'Housing Strategy and Interim HNDA', which provides an evidence-based analysis of housing demand, supply and affordability in the County to inform the housing policies in the Draft CDP including the provision of specialist and social and affordable housing in accordance with Part V of the Act, and to provide for an appropriate housing mix as per SPPR 1 of 'Sustainable Urban Housing: Design Standards for Apartments' (2018).

While the Assembly notes the strategic intent of the Council to promote an appropriate tenure mix and ensure the best use of public lands in HI Objective 19 which states that where residentially zoned Local Authority lands "are used to develop housing, that it is used exclusively for the delivery of social, affordable cost retail and affordable purchase homes" it is nevertheless suggested that housing

policies should seek to ensure a greater degree of flexibility in development that comes forward within the lifetime of the plan and to ensure consistency with NPO 37 of the NPF and SPPR 1 of Section 28 Apartment Guidelines, which require the appropriate housing mix be informed by an evidence based HNDA as set out above.

The Assembly note the inclusion of a Rural Housing Strategy to manage housing in rural areas and to protect rural amenities and high amenity areas and acknowledge that updated Ministerial Guidelines for rural housing are expected to issue from DHLGH. In this regard the Assembly welcome the inclusion of Policy H17 to manage rural generated housing in alignment with Circular SP 5/08 'Rural Housing Policies and Local Need Criteria in Development Plans' and the stated objective of the Council to commence a review of the Rural Housing Policy following the adoption of the Draft CDP. Further observations in relation to housing are set out in Section 2.0 above.

4.2 Healthy Placemaking

The Assembly welcomes the inclusion of policies to promote residential consolidation in urban areas and a dedicated Chapter 5 that promotes quality design and healthy placemaking in accordance with the Design Manual for Urban Roads and Streets (DMURS) and the '10-minute' settlement concept, where a range of facilities and services are accessible by walking, cycling or high-quality public transport creating opportunities to be physically active and contribute to climate action.

The Council are also to be commended for their commitment to promoting good urban design in the public realm as evidenced by the preparation of the County Height and Density Guide in Appendix 10 of the Draft CDP, which sets out specific guidance and performance-based criteria for building height to support delivery of increased residential densities and compact growth as part of a plan led approach, in line with the Urban Development and Building Heights Guidelines (2020).

The provision of social infrastructure as well as physical infrastructure is a key component of placemaking and the Assembly welcome the inclusion of a Chapter 8 Community Infrastructure and Open Space, which is informed by the undertaking of a detailed Community Audit in the County. This is supported by Chapter 12, which sets out a tailored approach to service and infrastructure provision in tandem with planned development in the seven Neighbourhood Areas where key services and facilities are found to be common to particular towns/villages and urban centres in the County.

Table 9.1 sets out a hierarchy of public open spaces and Table 8.2 sets out open space standards for new development, which will support healthy placemaking and quality of life, along with policy objectives to develop a comprehensive network of County Greenways linking parks and public open spaces and wider strategic greenway networks. Also welcomed are policy objectives to support the integration of sustainable urban drainage systems (SUDS) and natural solutions to enhance biodiversity along with the provision of sports and recreation facilities in the County including implementation of the Council's Play Space Programme.

The Assembly welcomes the recognition given in the Draft CDP to the Local Economic Community Plans (LECPs) in promoting community development and social inclusion. The Council will note that the Regional Assembly has a statutory oversight role in the preparation of LECPs in ensuring consistency between the upcoming round of LECPs and city and county development plans.

5. Sustainable Movement

The Regional Assembly welcome the stated commitment in this Chapter, to integrated transport and land use, promoting sustainable mobility including walking and cycling and public transport, and placing the connected neighbourhood at the core of the approach to placemaking in the Draft CDP, supported by the implementation of tailored policies in Chapter 12: Neighbourhoods.

The Council is to be commended for its early engagement with the National Transport Authority and in undertaking Sustainable Movement Studies for each of the seven Neighbourhood Areas and incorporating mode shift targets into the planning and design of future development in the County with specific targets for car-based trips (50%), walking (15%) cycling (10%), rail (5) and bus (20%) trips.

Also welcomed is the progress made by the Council in developing Cycle South Dublin Routes and Projects, set out in Table 7.1 of the Draft CDP, promoting active travel to schools and a proactive approach that recognises the role of road and street design and connected neighbourhoods as a core element of placemaking. The Assembly commend the proactive approach taken by the Council in identifying permissive access routes, which will support objectives to increase permeability in urban centres and the development of strategic green networks in the County.

The Assembly also supports the continued roll out of walking and cycling and public realm improvements in response to the COVID-19 pandemic, which should incorporate principles of universal design and monitoring to inform permanent solutions where clear benefits are identified and support implementation of the Greater Dublin Area (GDA) Cycle Network.

The targeted mode shift to sustainable transport will be facilitated by the delivery of key public transport infrastructure projects such as DART and Luas Expansion Programmes, including DART + Southwest and Luas to Lucan, BusConnects enhanced orbital and core bus corridors and improved active travel networks in the County. Capacity for growth will be further supported by a new station at Kishogue, the provision of new multi-modal transport interchanges and park and ride facilities at key transport nodes in line with the transport investment priorities in the RSES, along with any future transport projects that may arise from the current review of the NTA Transport Strategy for the GDA.

The Council's attention is brought to Section 5.6 Key Transport Infrastructure in the Metropolitan Area and Section 8.4 Transport Investment Priorities of the RSES including Table 8.4 Road Projects in the RSES. In this regard, it is noted the proposed Western Dublin Orbital Route in Table 7.5 of the Draft CDP and its delineation on Land Use Zoning Maps may be premature pending the outcomes of the current Review of the NTA Transport Strategy and it is recommended that the Draft CDP be accordingly reviewed and amended to ensure consistency with the RSES and with the NTA Transport Strategy for the GDA 2016-2035, or any update thereof.

The Assembly welcomes the setting out of climate positive measures to implement sustainable travel patterns, supported by integration of demand management to achieve modal shift and reduce carbon emissions from transport, also promoting mobility management plans for major developments and the roll out of EV charging facilities. The attention of the County is also directed to the publication March 2021 by the Department of Transport of the Five Cities Demand Management Study, which provides an evidence-based approach to addressing carbon, congestion, and air quality in cities.

6. Economic Development and Employment

The Assembly welcomes the inclusion of a Chapter on Economic Development and Employment which sets out the economic context and profile and Economic Strategy for the County under the themes of; Green and Innovative Economy; Urban Growth, Regeneration and Placemaking; Building on Clusters; and a Learning Economy.

The recognition given to the Local Economic and Community Plan (LECP) and Local Economic and Development Committees (LCDCs) in facilitating local economic development is welcomed, and the Assembly also highlight the role of the Local Enterprise Offices (LEOs) in promoting local enterprise and supporting micro and small businesses and social enterprise development.

The core strategy sets out a spatial distribution of employment lands and the Council is directed in this regard to the observations and the recommendations of the Assembly set out in the previous Section 2.6 Employment lands. The proactive approach to planning for the future development of

space extensive uses is welcomed and could be further strengthened by reference to the relevant RPO 5.5 and Guiding Principles for the Location of Strategic Employment and Investment and Integrated Transport and Landuse in Sections 6.3 and 8.3 of the RSES. Particularly welcome is the inclusion of Policy EDE7 to ensure the appropriate location of space extensive uses such as data centres and to require such enterprises demonstrate capacity for onsite renewables, energy efficiency and other climate positive measures that will support sustainable economic development in the County.

The Draft CDP includes policies to grow enterprise ecosystems, build on established high tech, manufacturing and research and development clusters to the west of the City (Grangecastle and Citywest), enhance synergies between industry and higher education institutes and develop skills, support remote working and the development of co-working space, promote technology innovation and grow the green economy in co-ordination with the South Dublin LECP and Climate Change Action Plan, all of which are supportive of the economic policies in the RSES and other government policies.

The Draft CDP also recognises the economic and tourism potential of leisure, cultural and natural assets in the County supported by the implementation of the County Tourism Strategy and alignment with Failte Ireland's key tourism brands.

6.1 Retail

The Draft CDP recognises retail as a key sector in terms of employment and attracting people into town centres, and the challenges facing the sector from increased online retail and the impacts of the Covid-19 pandemic. The County Retail Hierarchy is set out in Table 9.1 and is consistent with the Settlement Hierarchy and the Retail Hierarchy set out in Table 6.1 of the RSES.

The stated objective of the Retail Hierarchy is to promote a sequential approach for future retail development that prioritises designated centres, including Dublin city and suburbs as a Level 1 Metropolitan Centre, Tallaght and Liffey Valley Shopping Centre as Level 2 Major Town Centres, and a number of Level 3 Town/District Centres, Level 4 Neighbourhood/Local and Village centres and Level 5 Local Centres are identified, as appropriate to their level of retail service provision.

The Assembly acknowledge that the Retail Planning Guidelines for Planning Authorities (2012) require updating and note the stated intention of the Council to review the County Retail Strategy subsequent to the completion of any superseding Guidance or updated Regional Retail Strategy. It appears that capacity for retail development on existing zoned lands in the County are sufficient to align with planned population growth, however for the purposes of clarity it is considered the Draft CDP should include a general statement to confirm that no significant additional retail floorspace is proposed to be rezoned within the plan period.

The Regional Assembly welcome the policies in the Retail Strategy that promote placemaking and a town centre first approach to enhance the vitality and viability of retail centres. This is supported by the identification of retail opportunity sites and specific policy objectives for the core retail areas of Tallaght, Liffey valley and Clondalkin, for the development of district centres at Adamstown and Clonburris and to build on the character of South Dublin's historic villages, all of which are supportive of the policies in the RSES.

The Eastern and Midland Regional Assembly carried out analysis to identify which urban centres are most exposed to economic disruption due to the COVID-19 pandemic, as well as an economic analysis of co-working spaces to inform targeted supports and investment, and these publications can be found on at www.emra.ie.

7. Energy and Environmental Infrastructure

The Assembly welcome the proactive approach to energy planning in South Dublin set out in Chapter 10: Energy and the range of policy supports set out in Chapter 11: Infrastructure and Environmental

Services in relation to the protection of environmental quality, flood risk management, provision of adequate water supply and wastewater treatment, sustainable management of surface water and minimising waste in accordance with the principles of the circular economy.

Also welcomed is the ongoing implementation of the South Dublin Climate Change Action Plan, which sets out the baseline climate adaptation and mitigation assessment and target actions for Energy and Buildings, Transport, Flood Resilience, Nature Based Solutions and Resource Management, supported by the Dublin Climate Action Regional Office (CARO) and Dublin's energy agency Codema.

Chapter 10 Energy and Appendix 9 address the requirements of DHPCLG Interim Guidelines on Statutory Plans, Renewable Energy and Climate Change (2017). It is noted that Dublin's energy agency Codema, are currently refining the County energy model through the preparation of a 'Dublin Region Energy Master Plan' to provide an evidence base for emissions monitoring, and to inform identification of district heating opportunities and Decarbonisation Zones as required by the 2019 Climate Action Plan. Key initiatives include the Tallaght District Heating project, which will use waste from a data centre, the preparation of energy masterplans for Grange Castle and Clonburris SDZ lands and the integration of energy planning in the upcoming Naas Road Framework Plan.

A Landscape Character Assessment (LCA) updated in 2021 accompanies the Draft CDP. A Wind Energy Sensitivity and Capacity Analysis was carried out as part of the original LCA in 2016 and a policy objective is included to review the current Wind Energy Strategy for the County during the lifetime of the Plan having regard to any updated Wind Energy Guidelines, which is welcomed. Fig 10.4 Wind Energy Analysis indicates the area of wind potential for large scale wind energy infrastructure in the County is limited, however the Council remains supportive of small-scale wind energy developments along with a range of renewable energies including solar, small-scale wind and hydroelectricity. The attention of the Council is also drawn to policies in the RSES that support micro generation and energy retrofitting highlighting the potential use of solar including on commercial and industrial buildings.

Chapter 11 sets out policy objectives to facilitate the provision of strategic energy and water/wastewater and telecommunications infrastructure including implementation of key strategic infrastructure such as the Greater Dublin Strategic Drainage Study (GSDS), the Eastern and Midlands Region Water Supply Project, reinforcement of the Greater Dublin Area electricity network and ongoing roll out of high-speed broadband within the County, in line with the policies of the RSES.

Section 11.7 sets out policies to manage development within the County for Dublin Airport, Casement Aerodrome and Weston Airport, with reference to relevant National Aviation Policy and international standards regarding noise-sensitive developments and public safety zones in the vicinity of airports.

7.1 Flood Risk Management

An appraisal of the potential impacts of climate change was carried out as part of the Strategic Flood Risk Assessment (SFRA) with regard to the OPW climate change parameters in the Flood Risk Management Climate Change Sectoral Adaptation Plan (2019). The attention of the Council is also drawn in this regard to RPO 7.43 of the RSES and the need to ensure the resilience of critical infrastructure that is capable of withstanding, adapting and recovering from extreme weather events.

The SFRA for South Dublin has been carried out in accordance with the OPW Flood Risk Assessment Guidelines for Planning Authorities (2009) and provides an assessment of flood risk within the County accompanied by a series of Flood Maps to identify areas at potential risk of flooding and to highlight development areas that require more site-specific assessment in accordance with the Guidelines.

The SFRA provide recommendations for stormwater management and SUDS and for riparian corridors and buffer zones along watercourses that have been incorporated in the County Green Infrastructure Strategy and development plan maps, which is an extremely positive addition to the Draft CDP. The

attention of the Council is also drawn in this regard to the publication by Inland Fisheries Ireland of 'Planning for Watercourses in the Urban Environment' guideline document.

In relation to environmental quality, the Council has adopted the 'Dublin Regional Air Quality Management Plan and the 'Dublin Agglomeration Environmental Noise Action Plan' and has established a number of air quality monitoring stations, which provide up to date information on air quality in the County.

8. Implementation and Environmental Reports

The Assembly welcomes the inclusion of a dedicated Chapter 13: Implementation and Monitoring, which sets out development standards, land use zoning objectives and criteria that arise out of the policies and objectives of the Draft CDP, which will ensure that future development occurs in an orderly manner and are considered to provide a comprehensive framework for the assessment of planning applications in the County.

The establishment of a monitoring framework is structured in line with the Chapter sequence of the Draft CDP and identifies Key Performance Indicators and data sources, which will assist the Council in monitoring the implementation of plan policies meeting its statutory reporting requirements. The Council is to be commended for the inclusion of monitoring mechanisms to ensure effective delivery of the CDP and for greater transparency on the progress made in its implementation.

The attention of the Council is also directed to the development of an emerging Regional Development Monitor by the Regional Assembly, which is aligned to National and Regional Strategic Outcomes in the NPF and RSES, and which may provide additional guidance in monitoring the delivery of local authority development plans.

The Assembly also welcomes the preparation of the Draft CDP in tandem with the required environmental processes, namely Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA). The SEA Environmental Report was issued with the Draft CDP and sets out the iterative process to date including an assessment of the overall environmental effects arising from the Draft CDP provisions. The Environmental Report concludes that taking into account the mitigation measures which have been integrated into the Draft CDP, it has been determined that significant residual adverse environmental effects will not occur as a result of the implementation of the Plan.

The Draft CDP is subject to Appropriate Assessment (AA) and a Natura Impact Report (NIR) has recorded the decisions that were taken during its preparation. It is concluded that the Draft CDP will not adversely affect (either directly or indirectly) the integrity of any European site, either alone or in combination with other plans or projects.

It is noted that the subsequently published Errata to the South Dublin CDP have also been assessed against the Strategic Environmental Objectives (SEOs) as set out in Chapter 6 of the Draft Environmental Report and against criteria sets out in section 7.1 of the Natura Impact Report (NIR).

It is further noted that the required environmental processes are ongoing and will inform and be concluded at adoption of the CDP.

Conclusion

It is considered that the Draft South Dublin County Development Plan 2022-2028, and in particular the core strategy, can achieve consistency with the Regional Spatial and Economic Strategy (RSES) 2019-2031 by addressing the recommendations and observations set out above.

The Regional Assembly welcomes the publication of the Draft South Dublin County Development Plan, which marks the beginning of the alignment of planning policy at county and local levels with Regional

and National Policy. It should be noted that the officials of the Regional Assembly are available to discuss the matters raised above and welcome further opportunities to engage in the statutory process of the making of the South Dublin County Development Plan.

Regards,

A handwritten signature in black ink, appearing to be 'J. Conway', written in a cursive style.

Jim Conway
Director
Eastern and Midland Regional Assembly
10th September, 2021