

4th November 2019

Senior Executive Officer,
Forward Planning Section,
Land Use Planning and Transportation Department,
South Dublin County Council,
County Hall,
Tallaght,
Dublin 24.

Re: Proposed Variation 4 to the South Dublin County Development Plan 2016-2022

A Chara,

Thank you for your authority's work on proposed variation no.4 for the purpose of incorporating the National Planning Framework and the Eastern and Midland Regional Strategy into the South Dublin County. The Office of the Planning Regulator (OPR) has evaluated and assessed the proposed variation to the development plan, above, under the provisions of Section 31AM(1) and (2) of the Planning and Development Act 2000, as amended (the Act).

As your authority will be aware, one of the key functions of the OPR includes assessment of statutory plans and strategies to ensure consistency with legislative and policy requirements relating to planning.

The Office is currently developing an overall evaluation and assessment methodology for statutory plans. The submission below has been prepared to provide a high-level input to your authority in finalising the proposed variation of the plan.

1. Matters within the scope of S.10 and S.10(2)(n)

The Office has no comment in this regard.

2. Consistency of proposed variation no.4 with the hierarchy of statutory plans

The purpose of the proposed variation is to incorporate the National Planning Framework and the Eastern and Midland Regional Strategy into the South Dublin County, as required under section 11(1)(b) of the Act. There proposed variation provides a revised settlement hierarchy (table 1.1 and Fig. 1.1 of the plan, refers) for the county, as follows:

1 Metropolitan (South Dublin) – renamed Gateway Core

- 2 Consolidation Areas within the Metropolitan (areas specified) renamed Consolidation with the Gateway
- 3 Metropolitan Consolidation Towns (Tallaght, Lucan including Adamstown, and Clondalkin including Clonburris) unchanged
- 4 Self-sustaining Growth Towns (Saggart / Citywest) renamed Moderate Sustainable Growth Towns
- 5 Towns and Villages (Newcastle and Rathcoole) renamed Small Towns
- 6 Rural (Metropolitan Area and Rural Area) additional tier

The revised strategy provide for an additional settlement tier, 6. Rural (Metropolitan Area and Rural Area), but otherwise the existing settlements tiers within the hierarchy have been renamed and not materially amended, although there is some uncertainty regarding proposed settlement tier 1.

RPO 4.1 requires core strategies to be determined by local authorities in accordance with the RSES. Under RSES (Section 4.2 Settlement Strategy and table 4.2 Settlement Hierarchy) the Metropolitan settlement tier refers to *Dublin City and Suburbs*. The proposed renamed tier 1, Metropolitan, under the Plan appears to encompass the entire South Dublin County. Notwithstanding that the proposed tier 1 designation under the proposed variation has no material effect, with no population and housing targets are assigned to this tier, it is inconsistent with the RSES. The Office therefore advises that your planning authority reconsiders the designation of this tier within your settlement hierarchy.

Tier 1 of the RSES, comprising *Dublin City and Suburbs*, is effectively provided for in the lower tier settlements, tiers 2 and 3 settlements and possibly 4 (this is unclear, see below). Although the Office acknowledges the approach provides a logical structure to the consolidation and intensification of residential and employment development within the city and suburbs area, the approach is not fully consistent with the growth strategy under the RSES. The growth strategy for the region is set out in chapter 3 of the RSES, is elaborated upon in S.4.4 Dublin City and Suburbs and in Chapter 5 Dublin MASP, and supported by the Transport Strategy for the region (Chapter 8 Connectivity). Local authorities are required (by RPO 3.1) to commit to the delivery of the growth strategy which is based on sustainably managing the growth of Dublin to 1.4 million in the city and suburbs by 2031, an increase of c.220,000. This is to be achieved through realising the compact growth targets (under RPO 3.2, NPO 2a and NPO 3b) within the city and suburbs, focused along defined strategic development corridors and identified landbanks.

The RSES identifies the South-West Corridor running along the Kildare line DART expansion and the LUAS red line, as the relevant development corridor for South Dublin County. The strategic development areas identified (for residential development) by RSES are the brownfield regeneration lands at Naas Road and Tallaght, new communities at Fortunestown (supported by LUAS red line), and the consolidation of western suburbs of Kilcarbery and Adamstown (served by the electrified Kildare line delivered by 2027) and at Grangecastle (served by Bus Connects). In addition, strategic lands for employment and mixed-use intensification are identified at Naas Road / Ballymount and Tallaght Town Centre / Cookstown.

The population targets under the plan (Table 1.4) have not been revisited under the proposed variation, although they were recently revised under variation no.3 (adopted May 2019). The overall population targets (310,851) to the end of the plan period are reasonably consistent with the RSES (308,000-314,000 to 2026), although the revised population forecast to 2022 (at 299,907 persons) falls below this. However the population targets for the individual settlement in the hierarchy do not align fully with the population capacity for the South-West Corridor under the RSES. This sets (in Table 5.1) a population capacity of 45,000 to 2026 (66,000 people by 2031) for the South-West Corridor within South County Dublin, supported by RPO 5.4, which specifically requires that identified strategic residential development areas shall provide for higher densities and qualitative standards as set out in relevant section 28 guidelines. The Office acknowledges the difficulty for your authority in refocussing the settlement strategy and population targets to align with the RSES within the time constraints involved and advises that this issue will need to be revisited in the coming review of the County Development Plan due to commence in June 2020.

The revised designation of Saggart / Citywest as a Self-Sustaining Growth Town is noted. The boundary to the settlement, in itself and in relation to the Dublin City and Suburbs settlement boundary is not defined. Whilst Saggart / Citywest is referred to as an emerging town in the RSES, Citywest is located within the defined boundary of Dublin City and Suburbs (under RSES), whereas the village area of Saggart falls outside the boundary.

Table 1.4 of the plan provides for an almost doubling of population growth for the settlement (unchanged) from 9,115 (2011) to 17,972 (2022). The land use zoning objectives for lands in the vicinity (unchanged) would suggest that the population growth is provided for in the vicinity of Citywest and Fortunestown inside the Dublin City and Suburbs settlement boundary. These lands are adjacent the LUAS Red Line, along the Southwest Corridor under the RSES, and do not form part of the settlement of Saggart situated outside the said boundary.

Within the context of RPO 4.1 (see above) and RPO 5.5, which requires that future residential development within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, the location and extent of Saggart / Citywest Self-Sustaining Growth Town relative to the boundary of the designated Dublin City and Suburbs area needs to be defined and any population allocation should be amended as necessary to align with the RSES Growth Strategy. Furthermore, it is necessary to define the settlement of Saggart, located outside the Dublin City and Suburbs boundary, within the settlement hierarchy of the county.

Recommendation 1 – It is recommended that your authority revises the settlement hierarchy in proposed variation no.4 to be consistent with the settlement hierarchy as set out in the RSES, as required by RPO 4.1 of the said Strategy. Specifically, your authority is advised to:

(a) Define the extent and location of proposed tier 4 settlement of Saggart / Citywest in relation to the settlement boundary to *Metropolitan Dublin City and Suburbs* under the RSES;

(b) Define the settlement Saggart, located outside the settlement boundary to *Metropolitan*

Dublin City and Suburbs under the RSES, within the settlement hierarchy of the county.

Summary

The Office requests that your authority addresses the recommendation outlined above, which are made in the context of the provisions of Section 31AM(3)(a), in order to ensure that the LAP is

consistent with relevant national policy obligations, guidelines and legislative requirements.

The report of the Chief Executive of your authority prepared for the elected members under Section 20 of the Act must summarise these recommendations and the manner in which they should be

addressed.

Your authority is required to notify this Office within 5 working days of the making of the local area

plan and send a copy of the written statement and maps as made.

Where the planning authority decides not to comply with a recommendation of the Office, or

otherwise makes the plan in such a manner as to be inconsistent with any recommendations made by the Office, then the Chief Executive shall inform the Office and give reasons for the decision of

the planning authority.

Such notice requirements enable the Office to consider the matters further as regards the making

of any recommendations to the Minister in relation to the provisions of Sections 31AO and 31AP of

the Act.

Please feel free to contact the staff of the OPR in the context of your authority's responses to the

above, which we would be happy to facilitate. Contact can be initiated through the undersigned or

at plans@opr.ie.

Is mise le meas,

Gary Ryan

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