

Planning and Property Development Strategic Policy Committee February 2019

Z6/Z7 Report

Introduction:

The City Development Plan 2016 – 2022 contains the following objective:
CEE04 :

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

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

On foot of this Objective the Council has been undertaking a study of all of the lands zoned for industrial and employment uses (Z6 and Z7) in the current Dublin City Development Plan. The purpose of this study is to examine the most appropriate policy and zoning response following a detailed examination of the lands, having regard to the future needs of the city. Regard is also had to the National Planning Framework (NPF) and Draft Regional Spatial and Economic Strategy (RSES) objectives on urban consolidation and compact growth together with the new brownfield / infill emphasis and targets set out in those documents. These statutory planning documents have significant policy and zoning implications in the context of the City Development Plan's Z6 / Z7 Land Use Objectives.

National Planning Framework (NPF) (Project Ireland 2040)

The NPF sets out both the national strategic outcomes (NSO's) and national policy objectives (NPO's) for the future growth and sustainable development of the country to 2040. There is a major new policy emphasis on compact growth and urban consolidation. This is to prevent urban sprawl and to secure the provision of housing, jobs, amenities and services within our cities (National Strategic Outcome No. 1). The NPF sets a target that half (50%) of future population and employment growth will be focused in the Country's cities and suburbs (National Policy Objective 2a).

As the country's leading global city of scale the NPF acknowledges the critical role that Dublin City plays in the country's competitiveness. It therefore supports Dublin's growth (jobs and population) and anticipates the city and suburbs to accommodate an extra 235,000 / 293,000 people by 2040.

To support and manage Dublin's growth, the NPF is seeking that the city needs to accommodate a greater proportion of the growth it generates within its footprint than was the case heretofore and that housing choice, transport mobility and quality of life are key issues in the future growth of the city. The NPF therefore sets a target of at least 50% of all new

homes targeted for Dublin City and suburbs are delivered within its existing built-up footprints (NPO 3b).

To achieve these targets of compact growth and urban consolidation, the NPF identifies as key, the reusing of large and small 'brownfield' land, / infill sites, and underutilized lands at locations that are well served by existing and planned public transport. The NPF particularly highlights the need to focus on underutilised lands within the canals and the M50 ring. The benefits of such an approach for Dublin city are manifold and include: the potential to achieve more home and jobs in the city through high quality and high density mixed use development; continued support of existing services and infrastructure and facilitating people to live, work and recreate within a reasonable distance. Such an approach also facilitates the transition to a low carbon future.

To achieve these objectives the NPF sets out the following **Key Future Growth Enablers for Dublin:**

- Identifying a number of ambitious large scale regeneration areas for the provision of new housing and employment throughout the city and metropolitan area and the measures required to facilitate them as integrated, sustainable development projects;
- Determining a limited number of accessible locations for significant people intensive employment to complement the city centre and docklands area.
- Relocating less intensive uses outside the M50 ring in particular and from the existing built-up area generally;
- Delivering the key rail projects set out in the Transport Strategy for the Greater Dublin Area including Metro Link, DART expansion and the Luas green line link to Metro Link;
- The development of an improved bus based system, with better orbital connectivity and integration with other transport networks;
- Delivery of the metropolitan cycle network set out in the Greater Dublin Area Cycle Network Plan inclusive of key commuter routes and urban greenways on the canal river and coastal corridors;
- Facilitating the growth of Dublin Port through greater efficiency, limited expansion into Dublin Harbour and improved road access, particularly to / from the southern port area.

The strategic objectives of the NPF are aligned and underpinned by a new 10 year National Development Plan (NDP) which sets the framework for national capital investment to 2027. Additionally an *Urban Regeneration and Development Fund* has been put in place to support the objectives of the National Planning Framework for urban areas such as Dublin.

The NPF is to be implemented through the Regional Spatial and Economic strategy which in turn will set the parameters for the City Development Plan. The Draft Regional Spatial and Economic Strategy for the Eastern and Midland Regional Area is currently at Draft stage.

The Draft Regional Spatial and Economic Strategy for the Eastern and Midland Regional Area.

The Draft Regional Spatial and Economic Strategy for the Eastern and Midland Regional Area (Draft RSES) sets out the vision for growth (homes and jobs) and Regional Policy Objectives (RPO) for the Eastern and Midland Region (9 counties). It also includes a *Metropolitan Area Strategic Plan* for the Dublin metropolitan area.

The growth and settlement strategies of the Draft RSES reflects the compact growth / urban consolidation objectives of the NPF; in that it seeks the consolidation and re-intensification of infill, brownfield and underutilised lands with Dublin City and its suburbs with 50% of all new

homes targeted for Dublin and its suburbs to be located in the existing built up area in tandem with the delivery of key infrastructure to achieve, in Dublin City Council's administrative area, an increase in population of circa 100,000 people by 2031.

Regional Policy Objective RPO (Consolidation and Re-Intensification) 4.3:

Support the consolidation and re-intensification of infill / brownfield sites to provide high density and people intensive uses within the existing built up area of Dublin city and suburbs and ensure that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects.

A more detailed planning and investment framework for the Dublin Metropolitan Area is set out in the Dublin Metropolitan Area Strategic Plan (MASP). To support Dublin's sustainable growth and continued competitiveness MASP identifies a number of large scale strategic sites (strategic development lands), based on key corridors that will deliver significant development (housing and employment development) up to the year 2031. These key corridors include:

- Within the M50 (Multi – Modal)
- North South Corridor (DART Expansion)
- Maynooth Dunboyne Line (DART Expansion)
- South West Corridor (Kildare Line – Luas red line)
- Metrolink Corridor (Metrolink / Luas Greenline extension).

The strategic development lands within the City Council's area include Dublin Docklands, Poolbeg West and the potential of c.700 ha of brownfield lands in the Naas Road area straddling the DCC and South Dublin County Council's administrative areas. It identifies the Docklands and St. James Diageo and Industrial lands generally in the city as Strategic Employment locations seeking the intensification of all employment lands within the M50 (RPO 5.6 refers).

The MASP recognises that strategic sites, other than those outlined in the Plan, will come forward during the lifetime of the MASP through the ongoing provision of brownfield / infill intensification development.

The Z6 / Z7 Study is therefore timely in the context of the need to consider and meet National and Regional (draft) housing and employment (brownfield / infill / intensification) objectives and targets.

Context:

The core strategy of the current Development Plan approved by Council in 2016 identifies a need to provide a minimum of 30,000 new housing units during the 6 year life of the Plan. The Core strategy also demonstrates there is sufficient suitably zoned and serviced land to provide for 52,000 units. This reflects the reality that not all residential serviced sites will come on stream at once; particularly when addressing complex brownfield lands. The Council has the responsibility of managing all land resources with a view to providing for a sustainable long term approach, as there is a limited supply of land likely to be available for development and there is a clear need for a balance between the need to provide for housing and to provide for growth in employment in the City region.

Development Plans are required to zone lands for future uses. In this regard the City Development Plan has a number of zoning objectives, including Z1, to provide for residential development. In more recent development plans, the Council has introduced new zoning objectives including Z10 and Z14, which provide for sustainable mixed use development. Z10 allows for mixed use form of development to ensure local employment is provided for in combination with residential uses. Z14 provides for a similar sustainable mixed use approach at a larger scale in key growth areas of the City typically identified as Strategic Development and Regeneration Areas (SDRAs). As such, the analyses of Z6/Z7 Industrial Lands will require careful consideration of the most appropriate zoning for the future needs of the City, and the most effective mechanism for achieving the objective (LAPs, Guiding Principles etc).

Over 600,000 people work in Dublin (City and County), with approximately 75% of these living within Dublin. Ensuring the vitality of Dublin City is dependent on providing affordable places to live and places to work within a reasonable distance of each other, to allow people a good quality of life and to ensure a sustainable pattern of development. In examining these lands, it is essential that the Council ensures that a sustainable mix of uses are retained across the City, and that areas of the City do not become mono-use in their entirety. The City area contains many types of employment, some locally focussed and service based, some national and international from small start-ups to global firms. A balance is required to ensure that a strong mix of types of employment and essential local services are retained within the City. The mixed-use approach promoted in Z10 and Z14 objectives in the City Development Plan seeks to ensure that this balance is maintained in a sustainable manner. In examining the lands zoned Z6 and Z7, this “mix of use” philosophy plays an important part of the assessment and direction of the study.

The Council has a responsibility to ensure that the future of the City is one of a vibrant, attractive, functional City, based on a sustainable policy framework that allows for mixed uses within the City so that people can live and work and avail of services within a reasonable distance of each other. Land within the City is a precious resource, and ensuring that the best use is made of these lands is a core function of the Council, both as a Planning Authority, and also as a landowner.

The Z6 / Z7 Study:

The Z6 (Employment / Enterprise) Land Use Objective and the Z7 (Employment - Heavy) Land Use Objective amounts to c. 863 hectares of the 10,000 hectares that make up the City. The Z6 lands total c.607ha and this represents 6% of the City Council’s administrative area and the Z7 Land Use Zoning Objective comprises c.256ha representing 2.5% of the city. These employment zonings are located in all five administrative areas of the City. In assessing the Z6/Z7 lands a total of 82 study employment study areas / landbanks were identified. These study areas range in size, make up and profile. They include the 243ha Dublin Port lands; sizable Z6 landbanks comprising industrial estates located just inside / close to the M50; inner city former factory sites and clusters of high quality office buildings in the Dublin 2 and Dublin 4 areas.

Under the Z6 / Z7 land use zoning objectives a range of other uses related to employment are ‘permitted in principle’ or ‘open for consideration’ and therefore a range of other uses including local support businesses and retail and retail warehousing have been provided / permitted on Z6 lands.

The project team visited and examined each landbank recording the types of industry / business / service provided; the planning history of the site; adjoining land uses (existing and proposed) and identified key issues including public transport access, flood risk, drainage and planning history. Each of the sites has been photographed and mapped and a database of this information created. This documentation and research process is nearing completion.

Categories of Industrial Lands

For the purposes of the review of employment / industrial lands (Z6/Z7), five categories of employment / industrial lands have been identified and these are shown below.

Category 1: Small Scale Sites:

For these sites, due to their particularly small scale and the nature of surrounding uses, a change to more appropriate zoning policy would allow for the redevelopment of the site and address issues of poor street frontage and/or blight, provide new housing and/or new retail units and/or a denser level of employment use and local services. These will be considered for a future variation, following a more detailed assessment of the sites in question.

Category 2: Medium Scale Sites:

Other sites of a slightly larger scale, which contain a level of vibrancy and employment, but are operating at low volume of use and have the capacity to intensify, it is proposed to ensure that the site develops a mixed use character with a

good level of employment use, but is allowed grow to accommodate residential as part of this and to allow for regeneration at a site level. A future variation to reflect this will be considered for some of these sites, with others considered as part of the next Development Plan.

Category 3: Economically Strategic Sites:

For some sites, due to their specific location close to the M50, and/or Dublin Port and Tunnel and the Airport, the nature of their use for logistics and distribution and their strategic importance to the economy; or due to their specific local context, the Z6/ Z7 zoning will remain the most appropriate zoning.

Category 4: Larger Sites needing Framework Plans etc:

For a number of sites, which on their own total over 270 hectares - 45% of the total Z6:- it is intended to progress a more detailed study. All of these locations are of a strategic and regional level of significance; and change has implications to the current Core Strategy of the City Development Plan. For these sites, the scale of the lands involved means that any change would need to be addressed within a more detailed planning framework- such as an SDRA, LAP or SDZ.

Category 5: Other Miscellaneous Sites:

For some sites, the zoning is no longer a good reflection of the current use / their location, but any zoning change in the short term has no significant impact on the future use of the site or facilitate significant new development. For such sites, it is proposed that the zoning will be re-visited as part of the preparation of the next City Development Plan.

As part of the review each study area has been provisionally categorised as per the five categories above. The lands not identified as 'Economically Strategic Sites' (Category 3) or 'Larger Sites needing Framework Plans etc.' (Category 4) may be considered for intensification / mixed use potential. The following preliminary findings of this categorisation exercise are set out below:

Preliminary Findings

Economically Strategic Sites - Z7 (Employment - Heavy)

The Z7 zoning objective (c.256 ha) relates to lands at Dublin Port and St. James/Diageo. The Z7 zoning objective also relates to a small land bank (c. 0.2ha) located at Kylemore Park West. Due to the strategic national importance of Dublin Port and the regional strategic importance of the St. James/Diageo lands, it is considered that the Port lands and St. James/Diageo lands should remain as Z7 lands (Employment - Heavy). The remaining Z7 lands at Kylemore Park West are considered below in the context of 'Larger Sites needing Frameworks Plans etc.'

Economically Strategic Sites - Z6 Lands

C. 217 ha of Z6 lands (c.35% of total Z6 lands) should remain as Z6 'Employment and Enterprise' due to the economically strategic nature / potential of these lands.

Other Z6 Lands - Potential Re-Zoning

The preliminary assessment of the remainder of the Z6 lands indicates the following breakdown of the potential re-zonings of these lands.

- Z1 (Residential Zoning): **5%**,
- Z14 (Regeneration) New Growth Areas: **45%**
- Other Z14 Mixed Zoning: **5.5%**,
- Z10 (Mixed Use Zoning): **9%**,
- Other Mixed Use Zonings (Z3 (Neighbourhood Centre), Z4 (District Centre) and Z5 (City Centre): **0.5%**).

While the Z6 rezoning outcomes is likely to evolve as the study progresses, the rezoning breakdown illustrates the mixed use / regeneration approach / outcomes envisaged in the Core Strategy of the Development Plan.

Potential Z14 (Regeneration) New Growth Areas

As outlined above potential New Key Growth Areas of the City are emerging which on their own total over 270 hectares - **45%** of the total Z6 lands. These are:

1. Jamestown Business Park/Finglas Business Centre,
2. Dublin Industrial Estate (DIE), Ballyboggan Road,
3. Oscar Traynor Road/Malahide Road/Coolock Drive and Malahide Road Industrial Park / Newtown Industrial Estate,
4. Kylemore Road/Park West Road (including small Z7 landbank) and Inchicore Works and Lands East of Kylemore Road.

In light of NPF and Draft RSES policy to target significant future growth (housing and employment) to brownfield lands within the M50 along high quality public transport corridors, these identified lands have the potential to contribute significantly to the achievement of regional housing objectives and employment land intensification objectives in Dublin City. The rezoning of these lands has, however, implications for the current Core Strategy of the City Development Plan. This must be fully assessed and Elected Members updated. These lands are significant in scale, and a change to their use cannot be piecemeal. For these sites, the scale of the lands involved means that any change would need to be addressed within a more detailed planning framework- such as an SDRA, LAP or SDZ. Changes for such large sites need to be framed around the Development Plan policies of place-making, creating/expanding amenities, examination of community needs, including schools provision; movement and connectivity and providing a good range of local services and ensuring quality employment locations proximate to where people live. The Council has gained considerable experience in regeneration from recent Development Plans, other local plans and SDZ Schemes.

Z10 Land Use Zoning Objectives

The text of the Z10 Land Use Zoning Objective may need to be reviewed. This is to ensure, for example, that existing quality employment, where it exists, is retained and that the mixed use rationale of the zoning objective can be easily and effectively applied to rezoned Z6 lands throughout the city. Other land use zoning objectives, including the Z6 land use zoning objective may need to be reviewed.

Next Steps

Section 12 (e) (18) of the amended Planning and Development Act, states there is a statutory obligation to ensure that the development plan is consistent with (a) the national and regional development objectives specified in (i) the National Planning Framework, and (ii) the regional spatial and economic strategy. It is anticipated that in order to comply with an adopted RSES, the development plan may need to be varied late 2019 / early 2010.

In respect of the Z6/Z7 review, it is proposed that work on the sites identified for a possible future variation will now commence. This will involve internal consultation and consultation with Elected Members in each area.

The Council will also now move forward utilising approved funding under the Department of Housing, Planning & Local Government Urban Regeneration & Development Fund to commence a detailed study of the Z6 lands at Naas Road/Kylemore Road and also commence examination of other Z6 key sites.

The next step will also examine the implications of any proposed changes to the Core Strategy and related objectives and policies contained within the Development Plan, with the possibility of incorporating any required changes into a future variation or variation.

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