

CONSTRUCTION INDUSTRY FEDERATION

Construction House, Canal Road, Dublin 6, D06 C6T2. Tel: (01) 4066000. Fax: (01) 4966953. E-mail: cif@cif.ie Website: www.cif.ie

Eastern & Midland Regional Assembly
3rd Floor North
Ballymun Civic Centre
Main Street
Ballymun
Dublin
D09 C8P5

EASTERN & MIDLAND

22 JAN 2019

REGIONAL ASSEMBLY

21st January 2019

Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region Public Consultation

The Construction Industry Federation welcomes the opportunity to comment on the Draft Regional Spatial and Economic Strategy published by the Regional Assembly. The Strategy, when adopted, will have a critical bearing on the focus and content of the County and City Development Plans to be adopted countrywide.

It is recognised that The National Planning Framework (NPF) Implementation Roadmap (published by the Department of Housing Planning and Local Government July 2018) includes Transitional Regional and County Population Projections to 2031. While this Roadmap has a direct influence on the Regional Spatial Economic Strategy now subject to public consultation, it is important that the Strategy to be adopted is viewed as a facilitative tool to promote sustainable development rather than a restrictive tool that constrains development.

The Construction Industry Federation engaged independent consultants Future Analytics Consulting (FAC) to undertake an independent comparative assessment of the NPF transitional population projections to the 'as-is' scenario in order to better contextualise the NPF transitional population figures.

Key findings of the FAC study included the following:

- The NPF's Roadmap population figures are based on an ESRI population forecast which is considered conservative. Most significantly, it assumes a dramatically lower level of net inward migration than what has been historically and recently achieved;
- The CSO's latest migration estimates show that net inward migration for Ireland of 34,000 per annum. The NPF assumptions are completely outdated - over the period 2017 to 2021 it assumes net-immigration to run at on average just over 8,000 per year, and from 2021 onwards net migration is assumed to run at 12,500 per year;



- Expected growth in the Eastern and Midlands Regional Assembly Area (EMRA) is being deliberately capped, in favour of redistribution elsewhere. The NPF makes an unrealistic assumption in relation to the re-balancing of growth to the regions without the necessary investment in infrastructure or provision of employment;
- The NPF's objective to target up to 50% of population growth to infill and brownfield sites for development must be assessed for practicalities. The reality of delivery is extremely challenging due to lack of availability, long lead-in time and complexities of the brownfield sites.

Having regard to the current challenges impacting our economy and the significant under-provision in housing supply to meet demographic demands, any under provision of zoned lands could result in an increase in house prices, exacerbate the housing crisis and encourage long distance commuting.

The guiding principle of the NPF, as set out below, must be the focus for planning authorities rather than centrally scripted theoretical population ceilings which are now shown to be conservative. These theoretical population ceilings have not been cross referenced to infrastructure availability and specific thresholds of scale within settlements, especially across the EMRA.

'In setting overall targets for future growth, it is a pattern of development that it being targeted, rather than precise numbers. From a long-term national perspective, the targeted location, relative scale and proportionality of growth will assist in monitoring and assessing delivery and performance.'

This means that planning authorities must be allowed to continue to:

- Translate realistic population projections into a requirement for housing stock;
- Relate that specific housing stock into a land allocation, including the clear set requirements for headroom in zoned land; and
- Examine the specific investments already in place or capable of being put in place, on a cost effective basis, into settlements to allow for national growth within those settlements.

All of the above is predicated on the best return on that public investment, rather than setting theoretical population ceilings, which will cause logical housing land areas to be mothballed.

The Federation welcomes the specific provisions in the Draft Strategy as published providing for the following:

- Taking Account of Existing Plans (p42):
 - The NPF or the NPF Implementation Roadmap document do not seek the down-zoning of land;
 - The zoning of land and planning permission alone do not necessarily guarantee delivery and population growth in accordance with projected targeted timeframes;
 - In planning for future growth, it will be important for planning authorities to set out and monitor the service capacity and likely rate of completion of development on zoned lands, both brownfield and greenfield as well as elsewhere, having regard to local conditions and trends;



- Much closer attention will need to be paid to actual delivery, taking steps that may be necessary to implement strategic planning aims, housing delivery in the immediate term and above all, the hoarding of land and/or planning permissions;
- Sites with long-term potential at priority locations should not be ‘reserved’ at the land allocation stages of the plan making and implementation processes, in such a way as would create an unreasonable dependency on such sites being brought forward or that would impede the bringing forward of other suitable lands with better prospects for delivery in the short term;
- Proactive land management therefore requires realistic prioritisation, proper monitoring and effective coordination across regional, metropolitan, city and county levels.
- Headroom:
 - The scale of projected population targets for cities means some transfer of projected growth to their wider metropolitan areas is appropriate, particularly during the transition period to 2026.

The Construction Industry Federation, while fully supportive of the pattern of development as targeted within the NPF and the objective of realising balanced regional development, has the following comments:

- The Department of Housing acknowledged that the NPF is a long-term plan to 2040 and beyond. While it contains targets of where Ireland should be at in that time period, the intent of the NPF is not to be prescriptive as to where Ireland should be at in the shorter segments and that the objectives of the NPF are not achievable overnight;
- The Department of Housing also acknowledged that nothing is proposed to restrict or cap the population growth of the Eastern and Midlands region;
- An immediate implementation of NPF policies without an appropriate transition period must not distract from or conflict with the immediate problem of solving the housing crisis;
- Prevailing levels of growth must be maintained in the EMRA region at a minimum for the short to medium term (to 2026). In the interim, a transitional provision must be made in the Regional Strategy so that the EMRA region can facilitate delivery of the region’s housing requirement during this period;
- Local authorities must retain the flexibility to determine the appropriate headroom requirements for their areas so that it is consistent with local factors that influence achievable density;
- The NPF targets the allocation of 50% of population growth to infill and brownfield sites in the cities, and 30% of population growth to the other key towns. This requires longer lead in times due to the complexity of clear legal availability and usability of brownfield sites and the time taken to move a complex brownfield site from zoning to actual housing delivery. Such sites are often in multiple ownerships, contaminated, poorly serviced, have inadequate public transport, may have multiple existing trading businesses operating on part of the site and may have uncooperative owners with differing preferences. Many are located in less desirable areas that require significant investment in the public realm. While the objective is agreed, the reality of delivery is often extremely challenging;



- The Regional Strategy policies should not lead to a reversal of planning policies that applied to date for designation of lands which determine infrastructure, schools, transport and investment provisions in these areas. This could lead to uncertainty and confusion in the market which will stymie investment. There is a danger that recent public investment in towns and districts formerly designated for growth might be underutilised;
- The potential for de-zoning and not providing for adequate supply of land in commuter towns in the EMRA region could have a very destabilising effect on a fragile development market. It is only very recently that large scale delivery of new homes has ramped up. The uncertainty that possible de-zoning and under-provision for adequate land supply brings to the market will affect market sentiment and investment in the residential development area and will also create uncertainty among the lenders which will lead to delays, higher prices and decreased supply;
- While the Federation is fully supportive of the NPF principles and the desire for balanced regional development, it recognises that investment in infrastructure and job creation in the regions must come first to pull population growth and natural migration of population to the regional centres. Withdrawal of zoning and not providing for adequate supply in other EMRA towns to push people North, West and South will not in itself drive population growth to other regions. It has potential to lead to long distance commuting and a mis-allocation of investment.

To summarise:

- A transitional period for implementation must be provided whereby historic and prevailing levels of growth for the EMRA region can be maintained while investment in infrastructure and job creation to support future growth in the regions is provided for and implemented;
- Acknowledgement that nothing is proposed in the RSES to restrict or cap the population growth of the Eastern and Midlands region;
- The Regional Strategy should not oblige any planning authority to de-zone any lands that have complied with previous planning authority core strategies;
- The Regional Strategy should recognise that population projections as set out in The National Planning Framework (NPF) Implementation Roadmap are conservative, that projected immigration levels are conservatively low, and that planning authorities must be allowed the flexibility to plan for higher levels of growth in the short to medium term; and
- Due recognition be given to the longer lead in time required to secure re-development of brown field sites and that this be reflected in the quantum of lands zoned for development in the short to medium term.

The Federation is available to offer any clarifications required relating to the above.

Yours faithfully



Hubert Fitzpatrick
Director

