Submission to Draft Eastern Regional Spatial & Economic Strategy

23rd JANUARY 2019

hibernia REIT

Hibernia REIT ('Hibernia') recognises the full extent of the housing crisis that Dublin is facing and wishes to play its part in meeting challanges which lie ahead in increasing housing supply. While the Metropolitan Area Strategic Plan ('MASP') does identify many of the key strategic housing sites which will be needed to meet the future demand, more sites are needed. Hibernia have put forward their lands at Newlands, Naas Road (144 acres) as an additional strategic site located within the South-West corridor on the Red Luas line.

Executive Summary

- This submission has been prepared on behalf of our client Hibernia REIT plc (Hibernia), who, in addition to a number of major commercial & residential investments in Dublin City centre, have significant landholdings (144 Acres) located at Newlands immediately to the west of the Red Cow Luas Park & Ride on the Naas Road.

- Our client is supportive of the overall policies and objectives of the draft Regional, Spatial & Economic Strategy, which have been framed in the context of supporting the implementation of the National Planning Framework. In particular, Hibernia supports the focus on compact urban growth by promoting higher densities, high quality housing schemes on infill and brownfield sites located within the built-up areas of our cities and towns, where they can fully utilise existing infrastructure, especially public transport, which can support a modal shift in favour of sustainable transport modes.

- Hibernia also welcomes the introduction of metropolitan scale strategic planning, which is particularly relevant for Dublin given that the city, and its sphere of influence, extends across multiple Local Authority areas.

- Dublin city and the wider metropolitan area are currently experiencing a housing crisis with severe shortages in supply to meet existing housing needs. It is our view that the draft Regional Strategy and Metropolitan Plan have not given sufficient attention to these matters in framing and designing the Metropolitan Plan. Hibernia recognises the importance of expediting the delivery of new housing stock to address both the current deficit and future growth.

- It is submitted that the MASP should quantify both the existing & future housing needs of the Region and the Dublin Metropolitan Area based on the NPF Implementation Roadmap population projections. This has currently not been included in the draft strategy. Once the level of housing needs has been established, the Metropolitan Area Strategic Plan should then identify and quantify where and when the requisite numbers of housing units will be delivered to meet existing and future demand.

Based on population figures and our knowledge of known demographic trends, matters will unfortunately get worse before they get better. This view is also supported by independent research by Future Analytics Consulting (FAC) who were commissioned as part of this submission to examine existing and future housing demand and demand in Dublin. Based on their research it is estimated that the population of Dublin (the 4 Dublin Councils) could grow by as much as 337,670 by 2031, which is over 95,000 higher than the NPF projections. Based on these figures FAC have predicted that, based on the draft MASP figures, there will be an under-provision of development land within the four Dublin local authorities of between 22,300 – 57,000 residential units by 2026 and between 57,700 - 98,000 by 2031.

The majority of this new housing supply (more than 50%) should be located within the Dublin City and Suburbs to address the RSO's Sustainable Settlement Patterns, Compact Growth and Urban Regeneration and Integrated Transport and Land use objectives.

- Having undertaken an evaluation of the identified strategic housing sites located within the five corridors, it is our view that there are insufficient lands identified in the draft MASP both to meet overall housing needs in the short and medium term, and to meet both individual local authority targets and the target to have 50% of new housing located within the city & suburbs.

- To address these shortfalls, the MASP together with the 4 Dublin local authorities will need to identify and include further strategic lands within the corridors, such as the Hibernia lands at Newlands, for housing.

- Such sites must be capable of being delivered in a timely fashion and at a scale & density to utilise the finite supply of undeveloped or under-utilised lands in accordance with the recently published Urban Development & Building Height Guidelines, and which makes full utilisation of existing transport, physical & social infrastructure.

- The Hibernia lands at Newlands, Naas Road (see overleaf) represent one of the last remaining large-scale undeveloped sites within the city & suburbs suitable for housing. These lands meet all the relevant criteria for a strategic housing site, are fully serviced and highly accessible, and have the additional advantage of being capable of being developed in the short term to deliver a substantial number of housing units (4000+).

- Given all of the locational and infrastructural attributes which the Newlands site possesses, these lands are eminently suitable to be included as a further strategic housing site within the South-West corridor, and, accordingly, Hibernia requests that Table 5.1 in the draft MASP is amended to explicitly include these lands along with the other identified sites on the Naas Road.

Figure 1:
Hibernia Lands at New-
lands, Naas Road

Contents

Submission by
Hibernia REIT

Planning Consultants
John Spain Associates

Urban Design
Urban Agency

Transport & Engineering
AECOM

1.0 Introduction

1.1 On the 5th November 2018 the Eastern & Midland Regional Assembly published a notice stating it had prepared a Draft Regional Spatial & Economic Strategy (RSES) and invited written submissions to be submitted by the 23rd January 2019.

1.2 This submission has been prepared on behalf of our client Hibernia, who, in addition to a number of major commercial & residential investments in Dublin City centre, has significant landholdings (144 acres) located at Newlands; to the west of the Red Cow Luas Park & Ride on the Naas Road. (See Map 1). This submission has been prepared by John Spain Associates in conjunction with Urban Agency and AECOM.

1.3 This submission will examine the planning context in which the draft Regional Strategy and Metropolitan Plan have been prepared, and, in particular, the severe ongoing housing crisis being experienced. We will examine how this situation will unfortunately get worse before it gets better given the significant current under-supply of housing and projected population growth.

We will then examine the proposals contained in the draft plan to assess whether the proposed supply is sufficient to meet the needs we have identified. This will demonstrate that there is an immediate need for additional strategic residential sites to be identified, preferably located within the existing built-up area of Dublin.

The submission will conclude by putting forward the Hibernia lands at Newlands as being an eminently suitable strategic site which would contribute to easing the residential supply difficulties.

2.0 Glossary

Active Land Management – This is the practice whereby Planning Authorities actively monitor the delivery of housing on lands zoned for residential use and proactively take steps to ensure sufficient lands are made available to meet the housing demand.

Dublin Metropolitan Area – This is the area covered by Dublin City, South Dublin and Dun Laoghaire-Rathdown and parts of Counties Fingal, Meath, Kildare & Wicklow the boundary of which was defined by the NTA Strategy for the Greater Dublin Area 2016-2035.

Dublin City & Suburbs – This is the area defined by the Central Statistics Office (CSO) and covers the administrative area of Dublin City Council and the contiguous suburbs in the adjoining county councils. (see Figure 2)

NTA – National Transport Authority

Hinterland – This is the area within Dublin's sphere of influence beyond the metropolitan area.

Headroom – This is the practice by Planning Authorities to zone additional land for housing, over and above that needed to cater for future population growth, on the basis that not all zoned land will be brought forward for development within the period of the Development Plan.

RSES – Regional Spatial & Economic Strategy

MASP – Metropolitan Area Strategic Plan

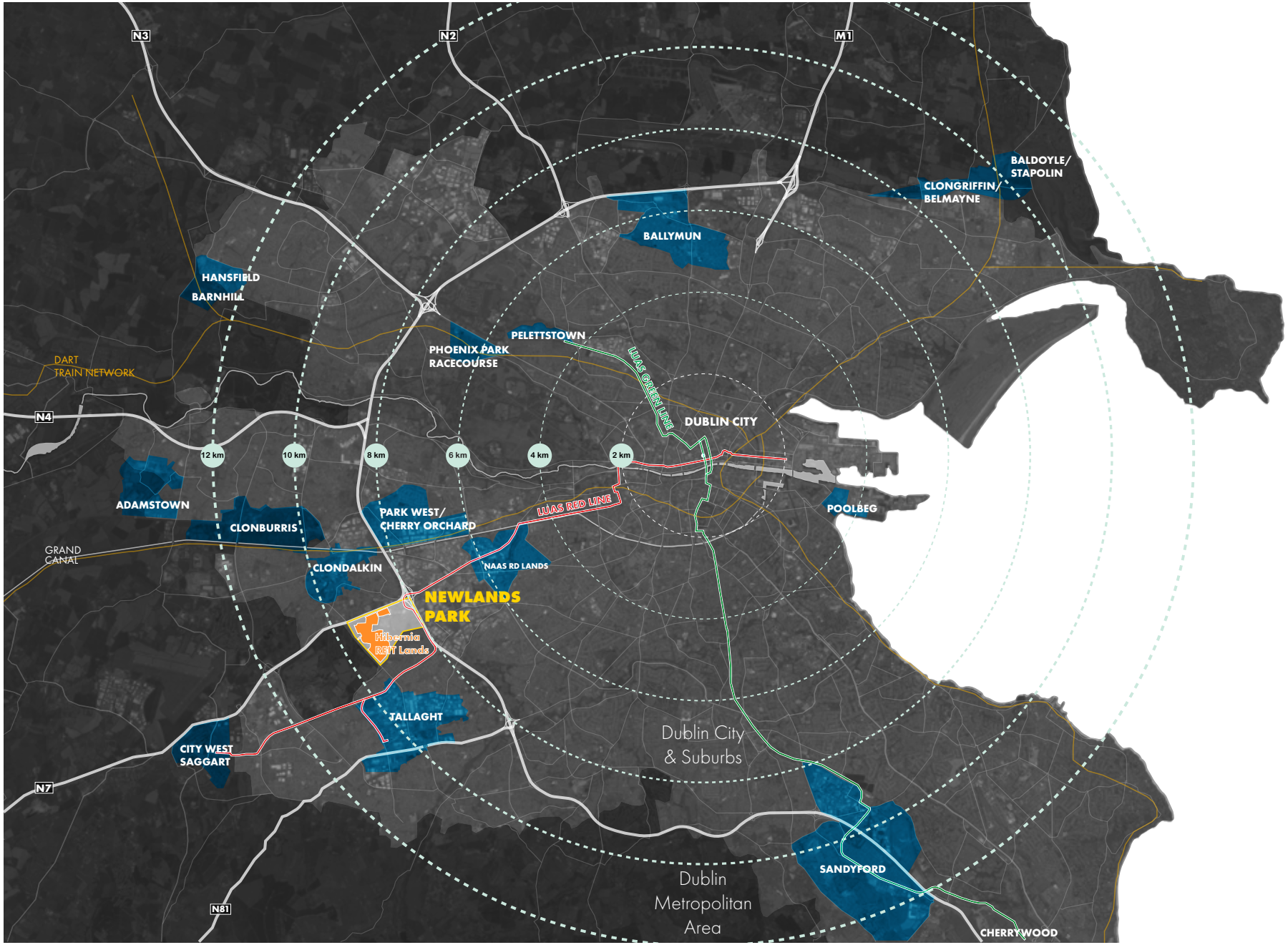

Figure 2:
Key Housing Sites

3.0 Planning Context

"Hibernia understands the need to translate the high-level objectives set out in the National Planning Framework into more concrete and specific regional planning objectives"

3.1

At the outset we wish to state that our client welcomes the publication of this draft Regional Strategy and supportive of the overall policies and objectives contained therein. We note the principal purpose of the RSES is to support the implementation of Project Ireland 2040, through the National Planning Framework (NPF) and National Development Plan (NDP), and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the Region.

3.2

Hibernia understands the need to translate the high level objectives set out in the National Planning Framework into more concrete and specific regional planning objectives, which in turn will provide guidance to local Planning Authorities in the review of existing City & County Development Plans which have to be undertaken post the adoption of the Regional Strategy in Q1 2019

3.3

In particular, we welcome the introduction of a new form of planning at the metropolitan scale in the form of the Metropolitan Area Strategic Plan (MASP), which seeks to ensure the continued competitiveness of Dublin and a supply of strategic development for sustainable growth. This submission, prepared on behalf of Hibernia, will focus its attention on this Metropolitan Plan. However, before doing so we wish to make some general comments regarding the wider regional strategy.

3.4

The regional profile provided in section 1.6 of the draft RSES provides a helpful overview of past demographic trends and the implications of these trends for future growth patterns this shows that from 2006 to 2016 the Region grew by 15% - an increase of over 300,000 people – exceeding the state average growth rate of 12% over the same period. The region contains some of the fastest growing communities in the country which increases demand for housing, infrastructure and services in those areas.

3.5

Population growth is set to continue following a return to net inward migration, a result of a resurgent post-crash economy, combined with a young demographic profile nationwide. However, the draft RSES has identified that population growth rates varied across the region, with some peripheral and inner-urban areas experiencing population decline between 2006 and 2016, while other areas have seen significant growth rates (see Figure 3 below). In line with a prevailing state-wide trend of urbanisation, the region saw a continued increase in the share of population residing in urban areas.

3.6

These demographic trends and associated spatial patterns of development illustrate that the new planning policies being espoused in the National Planning Framework, and now in the draft Regional Strategy, which are seeking to promote compact urban growth, will require a focused and sustained effort which will need to be actively supported by the constituent local authorities in their reviewed Development Plans.

3.7

In particular, it is critical that those Planning Authorities which make up the Dublin Metropolitan area quantify and identify sufficient serviced land to enable the right quantum of housing to be delivered in the right places at the right times to ensure that the policies of compact sustainable growth are fully implemented. This is a very important issue which we shall return to below in dealing with the Metropolitan Area Strategic Plan.

3.8

As Hibernia is an owner of a substantial "infill" landbank on the Naas Road (see Figure 1, Page 5) at Newlands, served by the Luas Red Line and situated with the defined Dublin City & Suburbs area, if can make a significant contribution to the goal of promoting compact growth on infill sites in close proximity to public transport corridors within the built-up area which can utilise existing public infrastructure.

Figure 3: Population Change 2006 - 2016

4.0 Housing Crisis

4.1

In addition to the new planning context within which the draft Regional Strategy & Metropolitan Plan have been framed, it is important to recognise the current housing crisis which the country, and in particular the Greater Dublin Area, is experiencing. This crisis has materialised as a result of the contruction industry collapsing from 2008 onwards which has led to a decade of little or no house building.

4.2

From 2011-2018 there was only 20,250 residential units delivered within the four Dublin local authority areas according to CSO housing completion figures. John Spain Associates estimate, based on the recorded population growth rate for the period, that there was an under-supply in the order of 33,000 residential units for the period. It is respectfully submitted that the MASP should give much greater prominence to the current housing crisis and existing pent-up demand.

4.3

The lack of supply has resulted in large components of the population having to seek alternative accommodation, such as: commuters that live long distances from work or college in the hinterland of the Metropolitan Area and having to spend long periods each day commuting; students and people entering the workforce having to remain in the family home, much longer than usual; over crowding in rental accommodation; unfortunate families that have had their homes repossessed and now being put up in temporary accommodation.

4.4

In this context of a housing crisis Hibernia recognise the importance to expediate the delivery of new housing developments in the short term to address the current housing supply deficits, as well as making provision for future population growth. Therefore it is imperative that in any assessment of housing needs it will be very important to move beyond solely an examination of land capacities, but to also critically examine the issue of the timing of housing delivery, especially on key sites. The length of time it takes from the zoning of land for housing to the completion of housing developments is often significantly underestimated, and can result in a significant shortfall of housing delivery.

4.8

In the absence of any published official data to quantify current housing needs within the Dublin metropolitan, Hibernia have commissioned Future Analytics Consulting (FAC) to undertake research to estimate the current magnitude of additional housing stock required to meet existing and future demand.

The full report of FAC research is contained in Appendix1.

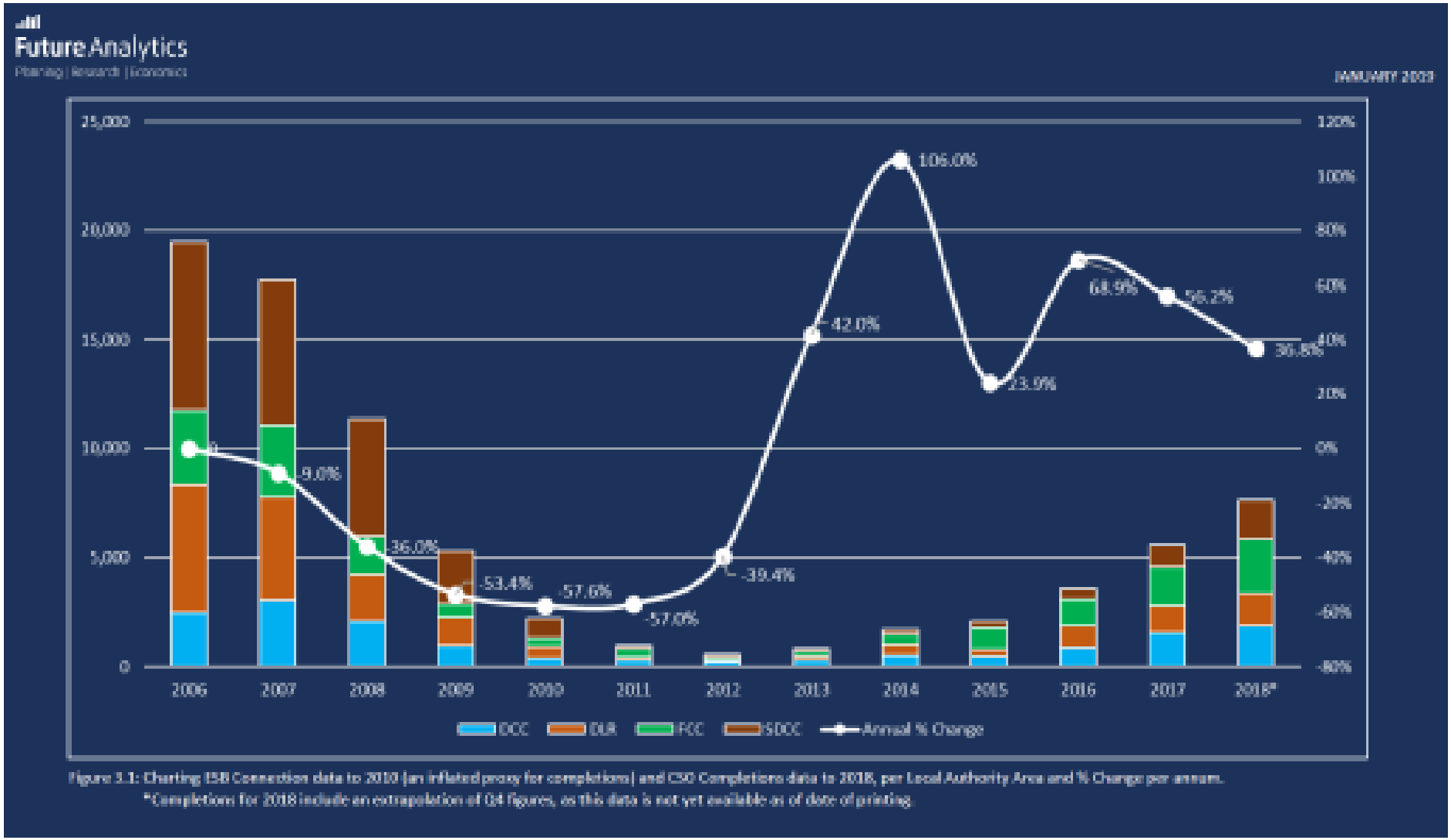

Figure 4:
Housing Survey Chart
2006 - 2018

5.0 Housing Crisis will get Worse Before it gets Better

Dublin City & Suburbs
NPF / RSES Projections

2.48
Avergage household size

227, 000
Projected population increase

91, 500+
Additional housing units by 2031

5.1

While the economic situation has improved significantly, there is still a large number of landowners (and/or their financial backers) that are reluctant to commit to developing their lands, due to a range of issues including: construction inflation (materials and labour) and hence affordability; restrictions in mortgages applied by the Central Bank, delays in adopting changes in planning legislation, and the time lag to receive planning approval. This has consequentially resulted in land hoarding and consequential inflation in the value of alternative land suitable for housing. To alleviate this inflation, we believe that additional suitable lands need to be identified for development by the Metropolitan Area Strategic Plan, such as the Newlands lands on the Naas Road

5.2

The NPF sets out a targeted pattern of growth for the Region and the capital city and this is further expanded in the Implementation Roadmap for the National Planning Framework (July 2018). A further breakdown of population projections to county level has been provided in Appendix B of the draft RSES for use by Local Authorities in the formulation of the core strategies of their Development Plans. These figures were taken directly from the NPF Implementation Roadmap.

5.3

Beyond these figures the only other population projections provided in the draft RSES are on page 28 of the document where it sets out the projected population for both Dublin city & suburbs and for the Dublin metropolitan area for 2031. The headline figure to take from these population projections is that by 2031 (the 12 year period of the strategy) Dublin city & suburbs will need to accommodate an additional 227,000 people (a growth rate of almost 20%). Even taking the conservative current average household size of 2.48, this equates to an additional 91,500+ households to be housed within the city and suburbs over the next 12 years.

5.4 The research report prepared by Future Analytics (see Appendix 1) suggests that the NPF population projections are in fact very conservative and are based on much lower migration rates than are actually being experienced at present. In fact, based on FAC population projection figures, there is going to be an additional 95,000 persons over and above the 2031 NPF projected population for the combined four Dublin Councils. This is a material difference that would require circa. 38,300 households based on an average household size of 2.48 to be provided.

5.5

Even after taking into account the projected population and the current housing shortfall, the critical factor is to take into consideration the time lag associated with the delivery of large housing developments which, in our view, is around 5 years to allow for the various different stages of a project (masterplanning, zoning, planning approvals, securing funding, delivery and selling). So for any strategic development sites to be completed by 2026 the projects will have to be initiated by 2021.

5.6

Once the demand is determined it is also recommended that a factor of contingency is added into the equation to take into account possible non-delivery of some planned projects, which could arise from many factors such as planning refusal, withdrawl from funding, delays to or cancellation of critical infrastructure environmental concerns. Accordingly, Hibernia would welcome the proposals for 'Headroom' as set out on Page 42 of the draft RSES, and requests that the Regional Assembly ensures that this is followed through on the review of the constituent development plans.

"... in addition to projected population growth and making good the shortfall, the critical factor is to take into consideration the time lag associated with the delivery of large housing developments."

6.0 Considering the Wider Context

6.1 Hibernia welcomes the introduction of metropolitan scale strategic planning, which is particularly relevant for Dublin given that the city, and its sphere of influence, extends across multiple Local Authority areas. The requirement for a Metropolitan Area Strategic Plan (MASP) to be prepared for Dublin as part of the draft RSES was set out for the first time in Project Ireland 2040 – National Planning Framework (NPF).

6.2

For Dublin City and Suburbs, we note that the RSES supports 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 ensures that the development of future development areas is co-ordinated with the delivery of key water infrastructure and public transport projects. The draft RSES also adopts the NPF target of at least 50% of all new homes being delivered within, or contiguous to, the existing built-up area of Dublin. In Hibernia's view this should be a minimum percentage and, in the implementation of the MASP, the relevant authorities should strive for a higher figure to allow for a more sustainable consolidation of the urban growth.

6.3

Hibernia is supportive of both the overall regional growth strategy and the approach for the development of Dublin proposed in the growth strategy as set out in Chapter 3 of the draft RSES. However, given the relative difficulties in developing brownfield/infill sites vis-à-vis greenfield/edge-of-town sites, it is respectfully submitted that the MASP should identify and quantify the infill and brownfield sites necessary to meet this 50% target and demonstrate how the requisite number of new housing units on brownfield/infill sites can be delivered within the short- (2026) and medium-term (2031). These figures are currently absent from the draft strategy.

6.4

Given that the Greater Dublin Area operates as a single housing market and given the seriousness of the current housing crisis, in our view a fundamental requirement of the MASP for Dublin is to quantify the scale of current and future housing needs and to set out a framework and pathway as to where and when housing can be delivered to meet these quantified needs in the short, medium and long term.

7.0 Dublin Metropolitan Area Strategic Plan (MASP)

7.1 The overall strategy for the Metro Area is based on the identification of four Strategic Corridors, where, along with the city centre, the bulk of future housing and employment devel- op- ments are to be located to accommodate an additional 242,000 people by 2031 (see Figure 5, overleaf, taken from the draft RSES).

7.2

To achieve the ambitious compact development target of at least 50% of all new homes within, or contiguous to, the existing built-up area in Dublin, the MASP identifies strategic residential, employment and regeneration development locations on the strategic corridors along with the requisite infrastructure investment needed to ensure a steady supply of sites in tandem with the delivery of key public transport projects as set out in the NDP.

7.3

The stated criteria for the identifying the corridors involved a selection of strategic development opportunities *proposed by Local Authorities* that included an evidence-based analysis of their current and future development capacity and their potential to deliver agreed strategic outcomes such as compact development; placemaking; accessibility to high quality public transport corridors; potential for economic development and employment creation and to support a reduced carbon footprint through greater energy efficiency and the creation of energy districts.

7.4

It is noted that all of the identified strategic development sites included in the draft MASP are ones which have already been incorporated in existing County/ City Development Plans and no new sites have been brought forward. In our view it would be advantageous for the Regional Assembly to work closely with the constituent Local Authorities to identify further suitable strategic sites based on the criteria set out in Section 5.3 of the MASP which have been included in Annex 3 below.

7.5

Hibernia supports the approach put forward in the MASP to promote sustainable compact growth in areas with existing enabling infrastructure, particularly high-capacity public transport links, and services. In this regard, we would recommend that the draft MASP be made more explicit to support, as a matter of priority, brownfield and infill sites within the Dublin City & Suburbs Area. This is implied in Section 5.7 of the MASP dealing with Housing Delivery, but this could be strengthened further.

7.6

Before moving on to examine in more detail the strategic corridors and the identified strategic sites and associated capacities, we would like to make an observation in relation Figure 5, right. While we understand that this figure is purely diagrammatic in nature, we would respectfully suggest that it be adjusted to show the Luas Red line to the south of the M7 (west of the M50) and not to the north as it appears to be.

Figure 5:
Extract from the draft Regional Spatial & Economic Strategy for the Eastern & Midland Region

8.0 Has MASP Identified Sufficient Land to Meet the Housing Needs?

8.1 Before examining the quantum, capacity and deliverability of the identified strategic housing and employment sites contained within the strategic corridors, it is important to highlight that the MASP, as currently drafted, does not attempt to disaggregate the housing supply figures either spatially or by type of site despite the fact there are separate targets for city & suburbs/metropolitan area and for brownfield/greenfield sites. In our view the MASP would benefit from such disaggregation and would facilitate monitoring and review.

8.2

Table 5.1 of the draft MASP sets out the Strategic Development Corridors, the capacities of the strategic sites contained therein, the associated infrastructural requirements and phasing. Based on the figures contained within this Table, the Regional Assembly has estimated that the combined capacity of all of the identified sites within the five corridors could accommodate a future population in the order of 242,000 by 2031 within the metropolitan area (note: no figure is given for the city & suburbs, even though there is a target of minimum 50%). In the absence of any housing capacity figures, taking the crude benchmark of 2.48 persons per household gives a housing capacity equivalent of 97,580 units.

8.3

Given that we have already estimated the actual housing need requirement to meet existing and future housing demand of circa. 12,500 units within the Dublin city & suburbs area alone, this represents a shortfall in provision of the order of circa 30,000 housing units in the medium term. However, in reality, this shortfall is likely to be even larger, given that many of the identified sites are unlikely to be fully developed within the 12 time-scale of the Plan, as shown by the sensitivity analysis undertaken by FAC and included in their report in Appendix 1.

8.4

At the slightly larger geographic scale of the combined area of the four Dublin local authorities, the FAC research has found that, based on their population projections and assessment of current residential land capacities, an additional 32,435 to 40,322 housing units will be required over and above what the draft MASP has provided for (see Appendix 1 for further details). Hibernia supports the robust analysis prepared by Future Analytics and its assessment that further land capacity will be required to meet expected housing demand resulting from projected population growth in the short- and medium-terms.

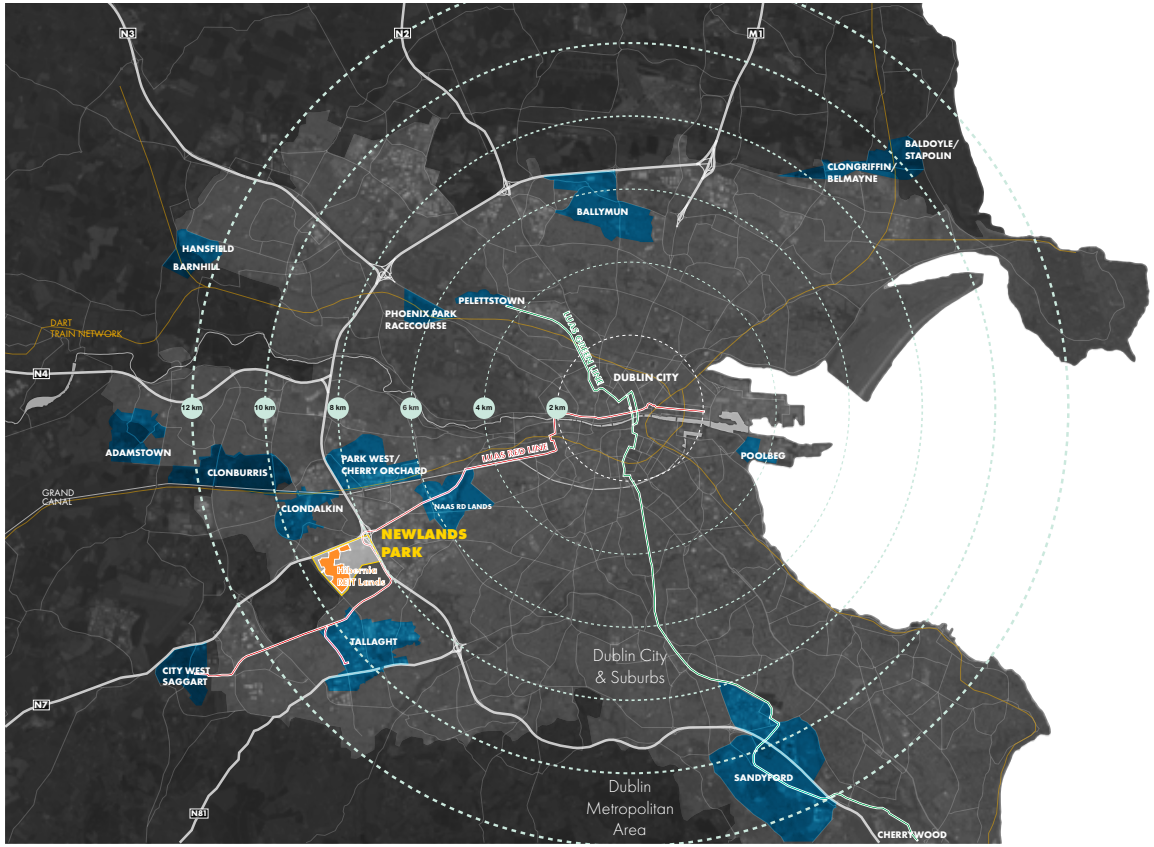

Figure 2:
Key Housing Sites

8.5

The discussed figures point to the fact that the draft MASP has not identified a sufficient quantum of lands that can meet the metropolitan area's housing needs in the short-term (2026) and out to 2031 and there is an immediate requirement for additional sites to be identified and included within an amended draft MASP.

9.0 Where Should New Housing Supply be located?

9.1 As noted above it is a specific objective of both the draft RSES and MASP that at least half of all future housing be located with-in, or contiguous to, the built-up area of Dublin in order to address the regional strategic outcomes of sustainable settlement patterns, compact growth, urban regeneration and integrated transport & land-Use objectives.

9.2

To address the shortfall in housing capacity identified in the previous section, the draft MASP working together with the four Dublin Local Authorities need to identify and include further lands within the corridors, located within the city & suburbs, suitable for housing, based on the guiding principles which the MASP has used to structure the growth of Dublin (see Appendix 3), including the requirement for headroom as per Page 42 of draft RSES.

9.3

Given the known time lag between site identification and commencement of development, such sites identified must be capable of being delivered as soon as possible and at a scale & density to utilise the finite supply of undeveloped or under-utilised lands in accordance with the recently published Urban Development & Building Height Guidelines, making full utilisation of existing transport, physical & social infrastructure.

9.4

Accordingly, we suggest that the Regional Assembly, in conjunction with the relevant local authorities, seeks to identify further strategic housing sites, preferably located within Dublin city & suburbs, and has these included within a revised and expanded Table 5.1.

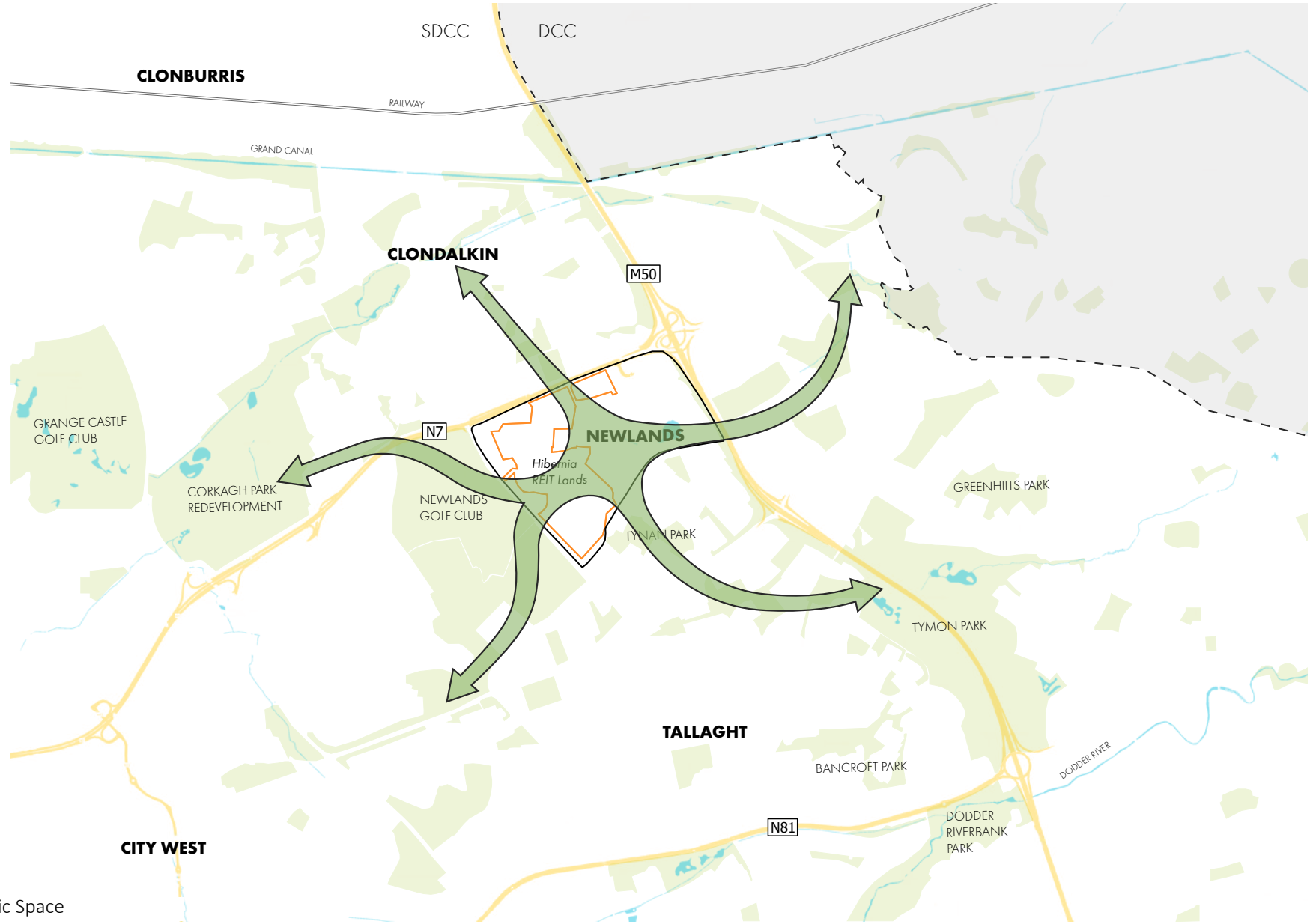

Figure 7:
Urban Consolidation

10.0 Contribution the Newlands, Naas Road Lands can Make to Housing Needs

10.1 The Hibernia lands at Newlands, Naas Road, represent one of the last remaining large scale undeveloped sites within the city & suburbs suitable for housing (see Figure 2) These lands meet all of the relevant criteria for a strategic housing site as set out in the draft MASP, which include:

10.2 Infill site within Dublin City & Suburbs close to city centre
The Hibernia lands at Newlands are located within the CSO-defined Dublin city & suburbs, 8km from the city centre, on an infill site located between Kingswood Heights and Clondalkin with extensive frontage onto both the Naas & Belgard Roads

10.3 Public Transport Accessibility
The lands are located within 10 minutes walking of both the Luas Red Line and the existing bus corridors and proposed Bus Connects corridors. This could be further enhanced by the provision of an additional stop on the Red Line and additional local bus services (See Figure 8)

10.4 Supports consolidation and intensification
Located within the metropolitan consolidation area as defined by South Dublin County Council in the Core Strategy of its current County Development Plan. The development of these lands next to high frequency public transport corridors would permit the creation of a substantial new community at appropriate densities which would complement and consolidate this part of west Dublin, including the proposed regeneration areas on the Naas Road further to the east (See Figure 8)

10.5 Makes full use of existing transport and other public infrastructure
These lands are already fully serviced and benefit from the presence of high quality public transport (Luas + Bus), advanced communications infrastructure, water and waste water networks, and energy infrastructure, all with spare capacity. (see summary infrastructure assessment report prepared by AECOM included in Appendix 2)

10.6

Given all of the above locational and infrastructural attributes which the Newlands site possesses, these lands are eminently suitable for inclusion as a further strategic housing site within the South-West corridor. In addition, given the very limited number of landowners involved and given our clients access to the requisite financing, these lands have the added benefit of being capable of being developed for large scale housing within the short-term timeframe.

10.7

It should also be noted that, given the previous inclusion of a number of other strategic development sites within the general Naas Road environs, which have already been subjected to Strategic Environmental and Appropriate Assessment, it is our view that the inclusion of this additional site within the South-West corridor would not require any further environmental assessments.

10.8

The lands within Hibernia ownership are capable of accommodating in the order of 4,000 housing units (+ other employment/mixed uses), while the immediately adjoining lands in other ownerships could accommodate an additional 3,500+ units. (i.e. 7,500+ in total).

Figure 8:
Public Transport Connections
(Existing & Proposed)

11.0 Conclusions

1

Our client, Hibernia, is supportive of the overall policies and objectives of the draft Regional Spatial & Economic Strategy, which have been framed in the context of supporting the implementation of the National Planning Framework. In particular, Hibernia supports the focus on compact urban growth by promoting higher densities in high quality housing schemes on infill and brownfield sites located within the built up areas of our cities and towns, where they can fully utilise existing infrastructure, especially public transport, which can support a modal shift in favour of sustainable transport modes.

2

Hibernia also welcomes the introduction of metropolitan scale strategic planning, which is particularly relevant for Dublin given that the city, and its sphere of influence, extends across multiple Local Authority areas.

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Dublin city and the wider metropolitan area is currently experiencing a housing crisis with severe shortages in housing supply to meet existing housing needs. It is our view that the draft Regional Strategy and Metropolitan Plan have not given sufficient attention to these matters in framing the Metropolitan Plan. Hibernia recognises the importance to expedite the delivery of new housing stock to address both the current deficit and future growth.

7

To address these shortfalls, the MASP together with the 4 Dublin local authorities will need to identify and include further strategic lands for housing within the strategic corridors.

8

The majority of this new housing supply (more than 50%) should be located within the Dublin City and Suburbs to address the RSO's Sustainable Settlement Patterns, Compact Growth and Urban Regeneration and Integrated Transport and Land-use objectives.

9

Such sites must be capable of being delivered in a timely fashion and at a scale and density to utilise the finite supply of undeveloped or under-utilised lands in accordance with the recently published Urban Development & Building Height Guidelines, making full utilisation of existing transport, physical & social infrastructure.

4

Based on populations projections and our knowledge of demographic trends, matters will unfortunately get worse before they get better. This view is also supported by independent research by Future Analytics Consulting who were commissioned as part of this submission to examine existing and future housing demand in Dublin. Based on their research it is estimated that the population of Dublin (the 4 Dublin Councils) could grow by as much as 337,670 by 2031, which is over 95,000 higher than the NPF projections. Based on these figures FAC have predicted that that, based on the draft MASP figures, there will be an under-provision of development land within the four Dublin local authorities of between 22,300 – 54,000 residential units by 2026 and between 57, 700 - 98, 000 by 2031.

5

It is submitted that the MASP should quantify both the existing & future housing needs based on the NPF Implementation Roadmap population projections. This has currently not been included in the draft Plan. Once the level of housing needs has been established, the Metropolitan Area Strategic Plan should then identify and quantify where and when the requisite numbers of housing units will be delivered to meet existing and future demand.

6

Having undertaken an evaluation of the identified strategic housing sites located within the city centre and the four strategic corridors, it is our view that there are insufficient lands identified in the draft MASP both to meet overall housing needs in the short (2026) and medium (2031) term, to meet both individual local authority targets and the target to have 50% of new housing located within the city and suburbs.

10

The Hibernia lands at Newlands, Naas Road represent one of the most connected large-scale undeveloped sites within the city & suburbs suitable for housing. These lands meet all the relevant criteria for a strategic housing site, are fully serviced and are highly accessible, and have the additional advantage of being capable of being developed in the short term to deliver a substantial number of housing units (4000+).

11

Given all of the locational and infrastructural attributes which the Newlands site possesses, these lands are eminently suitable to be included as a further strategic housing site within the South-West corridor, and accordingly Hibernia would request that Table 5.1 in the draft MASP is amended to explicitly include these lands along with the other identified sites on the Naas Road within the South-West corridor.

12

In this regard, we respectfully suggest that Table 5.1 on Page 77 of the draft MASP be amended by the addition of *"Infill site at Newlands, Naas Road"* under the LUAS Red Line Heading the short term capacity of the South-West corridor is increased by a quantum of 15,000 persons.

Appendix 1

Dublin's Capacity to Deliver

Report Prepared by Future Analytics Consultants

DUBLIN'S CAPACITY TO DELIVER

Assessments of Planning Activity, Available Land Capacity and Future Housing Needs across Dublin's four Local Authorities

FOR SUBMISSION AS PUBLIC CONSULTATION FOR THE EMRA DRAFT REGIONAL SPATIAL & ECONOMIC STRATEGY

JANUARY 2019

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Executive Summary

- Research undertaken by **Future Analytics Consulting** (FAC) shows that **population growth** across the four Dublin Local Authorities is set to exceed the growth targets set out under the Eastern and Midland Regional Authority (EMRA) draft *Regional Spatial & Economic Strategy* (RSES).

- Dublin County is on a trajectory to increase its population by over 250,000 people by 2026 and almost 340,000 people by 2031. Conversely, **the NPF uses an outdated conservative growth scenario** and as a result under-provides for likely growth in favour of fuelling Regional targets through policy-driven allocation of the population. Under the NPF, growth of just 170,000 by 2026 and 243,000 by 2031 is set being planned for across Dublin.

- Further to these assessments of population, this research also examined **the latest planning activity** across Dublin County, showing that there is almost 68,000 granted units in the development pipeline; though 53% of which are not yet commenced and may never be completed.

- **This research has identified available Unbuilt Residential Sites (URS)** across the county with a corresponding land area of 2,228 ha. in total or 1,142 ha. over the short-term.

- An examination of **the number of homes required** to accommodate the population indicates that between 69,000 and 102,000 homes will be needed by 2026, rising to between 105,000 and 145,000 homes by 2031.

- The **corresponding land requirements** range between 1,645 and 2484 ha. by 2026 and 2,486 and 3,600 ha. by 2031.

- A **housing/land needs assessment** indicates an under-provision of development land across County Dublin.

- This under-provision translates to **an equivalent unit deficit** of between -22,300 and -54,700 units by 2026 and between -57,700 and -98,000 residential units by 2031; assuming varying delivery densities.

- These findings can be mitigated by ensuring that sufficient quantities of suitable development lands in key areas across Dublin's Local Authorities are expanded when needed and issues resolved immediately. Not all URSs assessed are equally actionable and ready for immediate development, exacerbating the importance of advanced-planning to offset demographic-led housing requirements.

Contents

1.0 Introduction

Strategic planning and investment in Dublin's future is best informed by robust analysis of highly influential factors such as planning activity, the availability and capacity of suitably zoned lands, and future housing requirements arising from projections of demographic change.

The November 2018 publication of the draft *Regional Spatial and Economic Strategy* (RSES), by the Eastern and Midland Regional Assembly (EMRA), provides a valuable opportunity for such analysis to be conducted for Dublin and submitted as part of the process of public consultation on whether adjustments to the draft RSES should be considered in advance of its implementation as a statutory framework for future planning across the Region.

This report provides a summary of key facts and findings resulting from research undertaken by Future Analytics Consulting (FAC) into the aforementioned factors.

1.1 Context

FAC has been commissioned by Hibernia REIT plc to undertake an independent assessment of key planning, land and demographic factors influencing future growth across the Dublin's four Local Authority areas ('LA areas'). Namely, Dublin City Council (DCC), Dún Laoghaire-Rathdown (DLR), Fingal County Council (FCC) and South Dublin County Council (SDCC).

The purpose of this research was to establish key facts about the activity and delivery of housing, as well as to estimate the development capacity of remaining lands and how they might address future housing needs with respect to the NPF growth targets and a less conservative alternate projection.

1.2 Overview

The provision of future housing across Dublin will greatly reflect what is currently in the planning pipeline for delivery. The distribution of what is and can be delivered is governed by the availability and capacity of suitably zoned lands. To that end, various assessments were undertaken to establish key facts and estimates relating to these spatial factors, as outlined in the following Chapters.

2.0 A Growing Population

Future changes in the population of Dublin will greatly impact upon the provision and delivery of housing across the county. Historically, Dublin has been a driver of both supply and demand in housing across all counties in the EMRA, and in order to understand how future needs will manifest, a robust projection of population is needed.

2.1 The NPF Baseline

The baseline projection of population which underpins the National Planning Framework (NPF) was developed by the ESRI using best practices in demographic and spatial modelling. However, as outlined in their publication *Prospects for Irish Regions and Counties*[1], the ESRI assume a lower than anticipated level of net inward migration which runs contrary to historic and recent data published by the Central Statistics Office (CSO).

The NPF baseline assumes national net inward migration of just +8,000 people per annum to 2021, rising to +12,500 thereafter. This is in stark contrast to CSO published migration estimates which show a +19,800 net surplus in 2017, rising to a +34,000 net surplus in 2018[2].

Accordingly, the NPF scenario is underaccounting for migration – which is the most significant influential factor on population growth over the short term across Dublin.

Therefore, the NPF baseline is in essence a conservative growth scenario and this has many implications for how each of the three RSESs and subsequent Local Authority Development Plans will be drafted.

While the NPF sets out a range in its growth targets, even the upper end of this range falls short of the current anticipated growth trajectory under M1. The NPF is therefore planning for a level of growth across the EMRA which is likely to be outpaced by reality in the short term, particularly in County Dublin.

The reason for this may rest in how the NPF is predicated upon maintaining a parity of growth between the EMRA and the other two Regional Assemblies on a 50:50 basis. Growth in the other two Regions will be largely led by assumed movements out of the EMRA. Therefore, an effective cap is being instituted in all but name on the EMRA's natural growth, and the draft RSES is at risk of planning for a population outcome it will readily surpass.

[1] *'Prospects for Irish Regions and Counties'*, ESRI, January 2018

[2] *'CSO Migration Estimates'*, Central Statistics Office, August 2018

2.2 Issues in Bridging the Gap

The draft RSES identifies and sets out policy ambitions and responses to many of Dublin's key strategic opportunities and challenges. At the forefront of these is the 'Growth Strategy', which sets out the settlement hierarchy for the Region and Dublin County specifically, as well as key locations for population and employment.

The RSES must consider national policy and it can be seen that the draft has been directly informed by the July 2018 *National Planning Framework Implementation Roadmap*. The Roadmap primarily did three things:

1. Firstly, it clarified the legal status and enactment of many provisions set out by the NPF, specifically as pertain to the production of Local Authority Development Plans and how the RSESs will supersede their predecessors the Regional Planning Guidelines (RPGs).

2. Secondly, it set out series of transitional population growth targets for each county; effectively establishing a pattern of growth which importantly the draft RSES has no choice but to take account of.

3. Finally, as part of the above process the Roadmap sought to bridge the gap between the current statutory targets and the NPF baseline.

The resulting impact of the Roadmap and the incorporation of its transitional population targets into the draft RSES is a multi-faceted one.

In one respect, a growth strategy is nothing new, and is indeed a appropriate mechanism through which the RSES can align its objectives with anticipated growth. However, the use of the Roadmap's transitional population targets is not without concern, chief among these is that they are constructed without due regard being given to international best-practice in the projection of population.

In seeking to bridge the gap between past targets (noted now by the Department of Housing Planning and Local Government as 'exceeding any likely scenario') and the conservative NPF baseline which under accounts for likely growth, the resulting transitional figures provide an exceptionally weak basis upon which to develop targets and formulate planning policy.

This issue is further exacerbated by the transitional figures' inclusion of a flat headroom assumption to population instead of the usual process at Local Authority level of examining such needs on the basis of local requirements and available lands.

Therefore, in addition to assessing the NPF/draft RSES scenario, FAC has developed a scenario reflecting a continuation of Dublin's current growth trajectory.

2.3 An Alternate Scenario

As outlined in the previous section, the NPF transitional population targets, as restated in the draft RSES, are not without issue. In order to contextualise their impact in subsequent analysis, FAC have developed an alternate growth scenario predicated upon a continuation of historic and prevailing trends for County Dublin.

Specifically assumptions for a sustained higher level of net inward migration in keeping with the CSO's latest data and their current M1 assumption of 30,000 repeating per annum have been adopted. For the purposes of this report, this is referred to as the 'FAC scenario'. Further details are found in Appendix I.

2.4 Growth of Dublin's Local Authorities (LAs)

Under the NPF/draft RSES population targets, each of Dublin's four LA areas are set to grow by the same flat amount of approx. 12.6% to 2026 and 18% to 2031 (Table 2.1). Population growth is not so equally distributive, and this indicates a weakness within the NPF's approach towards top-down growth allocation.

As LAs differ, so to do their constituent settlements. Growth rates vary according to many factors and failing to take account of localised conditions will ensure the NPF figures will always remain a step behind the reality, until readjusted each census cycle.

Conversely, FAC's scenario (Table 2.2) shows demographically-informed change to 2026 and 2031 at county and LA level. This change is methodologically driven by modelling key assumptions in rates of fertility, mortality and migration. FAC have built-up Dublin's population at sub-settlement level (Electoral Division), providing a more robust projection basis than what is being used in the draft RSES.

Under the FAC scenario, Dublin will grow by 18.6% by 2026 and 25.1% by 2031. Increases of 250,0260 and 337,673 respectively on Census 2016. Varying at LA level and below, growth rates in FCC are set to undergo the highest level of change by 2031 at 30.1%, followed closely by DCC and SDCC at 24.3% and 23.5% respectively.

The relative difference between each of the scenarios as shown in Figure 2.1 overleaf, is more than just a higher set of core assumption at play. Dublin County is effectively capped at 1,590,000 as a growth target for 2031, whereas the FAC scenario runs with natural demographic changes. By incorporating the location of development lands, this projection also allows for enhanced integration of migrants into places where new residential development is underway or is set to materialise.

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Planning | Research | Economics

JANUARY 2019

	Census 2016	2026	2031
NPF - DCC	554,554	625,000	655,000
FAC - DCC	554,554	658,615	689,312

	Census 2016	2026	2031
NPF - FCC	296,020	333,000	349,000
FAC - FCC	296,020	360,276	385,104

	Census 2016	2026	2031
NPF - DLR	218,018	245,500	257,000
FAC - DLR	218,018	252,076	266,240

	Census 2016	2026	2031
NPF - SDCC	278,767	314,000	329,000
FAC - SDCC	278,767	326,652	344,377

	Census 2016	2026	2031
NPF - Dublin County	1,347,359	1,517,500	1,590,000
FAC - Dublin County	1,347,359	1,597,639	1,686,032

Figure 2.1: An array of population charts for County Dublin and each Local Authority area showing both the trajectory and difference between the NPF and FAC growth scenarios

5

Table 2.1: NPF Transitional Population Targets as set out within the draft EMRA RSES, including change, by Local Authority

LA Area	Census 2016	NPF 2026 Upper	NPF 2031 Upper	NPF 2026 CH	NPF 2031 CH	NPF 2026 CH %	NPF 2031 CH %
DCC	554,554	625,000	655,000	70,446	100,446	12.7%	18.1%
DLR	218,018	245,500	257,000	27,482	38,982	12.6%	17.9%
FCC	296,020	333,000	349,000	36,980	52,980	12.5%	17.9%
SDCC	278,767	314,000	329,000	35,233	50,233	12.6%	18.0%
Dublin	1,347,359	1,517,500	1,590,000	170,141	242,641	12.6%	18.0%

Table 2.2: FAC's 'adjusted' alternate growth projection scenario, including change, by Local Authority

LA Area	Census 2016	FAC 2026	FAC 2031	FAC 2026 CH	FAC 2031 CH	FAC 2026 CH %	FAC 2031 CH %
DCC	554,554	658,615	689,312	104,061	134,758	18.8%	24.3%
DLR	218,018	252,076	266,240	34,058	48,222	15.6%	22.1%
FCC	296,020	360,276	385,104	64,256	89,084	21.7%	30.1%
SDCC	278,767	326,652	344,377	47,885	65,610	17.2%	23.5%
Dublin	1,347,359	1,597,619	1,685,032	250,260	337,673	18.6%	25.1%

Table 2.3: Summarising the difference between the NPF and FAC adjusted figures, by Local Authority

LA Area	Census 2016	NPF-FAC 2026 CH	NPF-FAC 2031 CH	NPF-FAC 2026 CH %	NPF-FAC 2031 CH %
DCC	554,554	33,615	34,312	47.7%	34.2%
DLR	218,018	6,576	9,240	23.9%	23.7%
FCC	296,020	27,276	36,104	73.8%	68.1%
SDCC	278,767	12,652	15,377	35.9%	30.6%
Dublin	1,347,359	80,119	95,032	47.1%	39.2%

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3.0 Activity, Lands and Potential

3.1 Residential Planning Activity

Applications for residential development across Dublin which have been reviewed and granted permission to proceed by Local Authorities have been assessed[3].

As summarised in Tables 3.1 and 3.2, the distribution of granted planning applications across each of Dublin's LA areas is far from even; with DCC having the highest number of granted and commenced applications and SDCC the lowest.

In unit terms, FCC has granted the highest number of units and also has the highest number of commenced units.

In total, nearly 68,000 units are presently in the pipeline for delivery across each of Dublin's LA areas, with approx. 31,400 units of these commenced (Table 3.2).

This means that over 50% of granted units have not yet commenced for various reasons, tying up land which might otherwise be developed.

[3] Applications granted or commenced in excess of 2 units were assessed as part of this exercise across each Local Authority in Dublin, as of 17/01/2018.

Table 3.1: Planning Applications by Local Authority Area and Status

LA Area	Planning Applications (# Schemes)		
	Granted	Commenced	Grand Total
DCC	356	220	576
DLR	174	138	312
FCC	237	166	403
SDCC	110	105	215
Dublin	877	629	1,506

Table 3.2: Planning Applications by Nos. of Units, Local Authority Area and Status

LA Area	Planning Applications (# of Units)		
	Granted	Commenced	Grand Total
DCC	11,016	8,652	19,668
DLR	8,227	5,245	13,472
FCC	12,286	12,396	24,682
SDCC	5,016	5,098	10,114
Dublin	36,545	31,391	67,936

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Planning | Research | Economics

JANUARY 2019

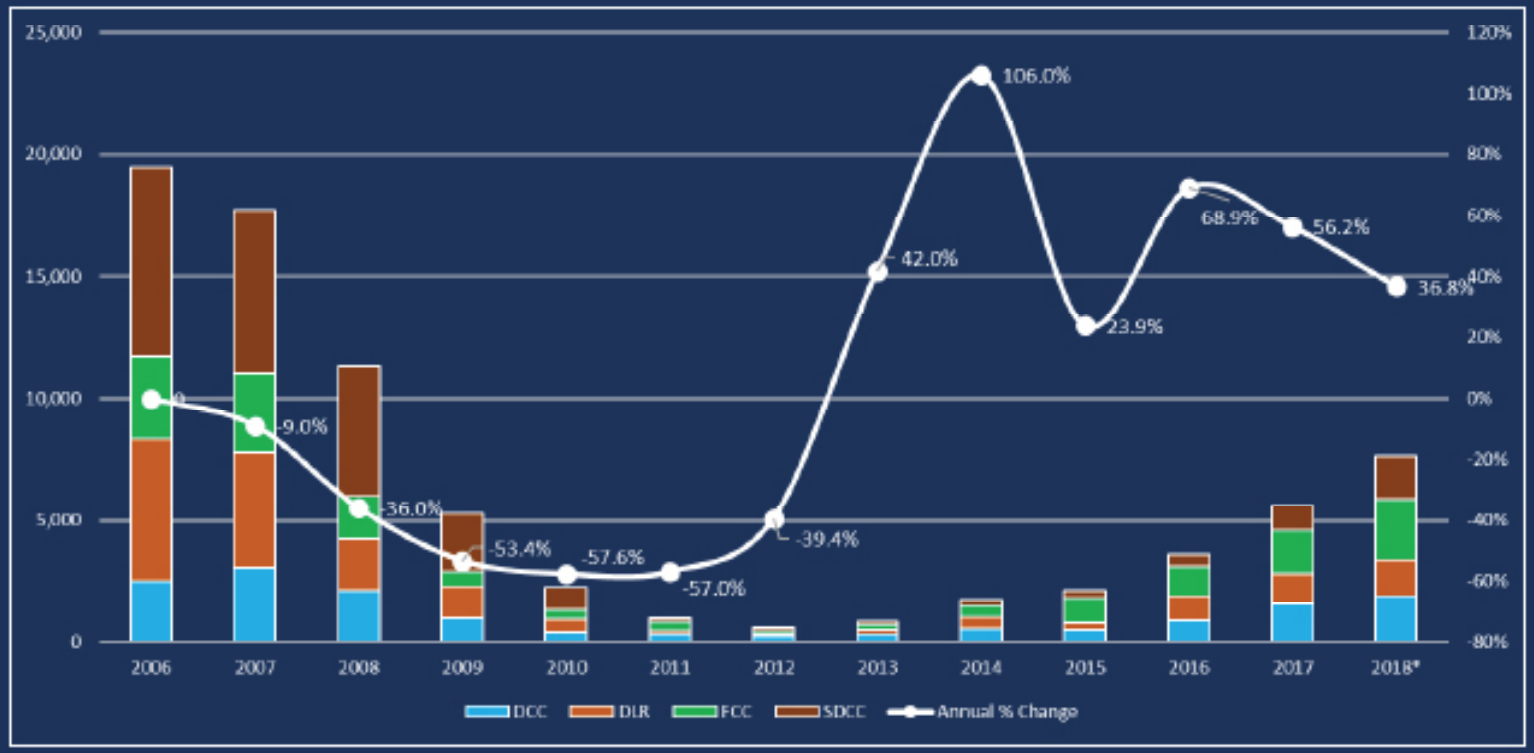

Figure 3.1: Charting ESB Connection data to 2010 (an inflated proxy for completions) and CSO Completions data to 2018, per Local Authority Area and % Change per annum.
*Completions for 2018 include an extrapolation of Q4 figures, as this data is not yet available as of date of printing.

Table 3.4: Table of ESB Connection data to 2010 (an inflated proxy for completions) and CSO Completions data to 2018 Q3, per Local Authority Area and % Change per annum
*Completions for 2018 include an extrapolation of Q4 figures, as this data is not yet available as of date of printing.

LA Area	ESB Connections Proxy (less accurate)					CSO Completions Methodology (more accurate)							
	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018*
DCC	2,472	3,052	2,087	952	384	305	233	294	546	485	893	1,589	1,902
DLR	5,863	4,725	2,149	1,309	540	130	91	208	466	295	974	1,189	1,456
FCC	3,389	3,270	1,758	632	405	407	131	185	457	1,031	1,234	1,827	2,504
SDCC	7,746	6,678	5,348	2,395	911	122	129	142	239	306	475	980	1,780
Dublin	19,470	17,725	11,342	5,288	2,240	964	584	829	1,708	2,117	3,576	5,585	7,641
Annual % Change	-	-9.0%	-36.0%	-53.4%	-57.6%	-57.0%	-39.4%	42.0%	106.0%	23.9%	68.9%	56.2%	36.8%

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JANUARY 2019

3.1.1 *Adjusting the Pipeline for estimated non-completions*

As shown in Figure 3.1, the rate of completions has unsurprisingly declined over the past decade on foot of the economic downturn. As highlighted later in this report (Tables 4.1 and 4.2, Chapter 4), an immediate sustained annual supply of approx. 6,900 to 10,100 units are needed to meet demographic requirements to 2026. With 2018's completions estimated to be around 7,600 units, we are only now entering this territory. However, latent demand will absorb much of that, so overall unit delivery will need to increase even higher.

An appraisal of completions as a function of granted permissions between 2007 and 2018, taking account of commencement lag, highlights a trend where 53% of granted units go uncompleted. Figure 3.2 visualises how this non-completion rate has been informed through analysis of historic data.

If this rate of non-completion extends into the coming period to 2026 and beyond, unit delivery as currently granted will be significantly impacted.

Table 3.5 provides an indication as to how this may appear when applied to the current granted pipeline. Total granted and commenced units would decline from 67,936 to 31,829, with those granted only falling from 36,545 to 17,122 and those commenced, from 31,391 to 14,707.

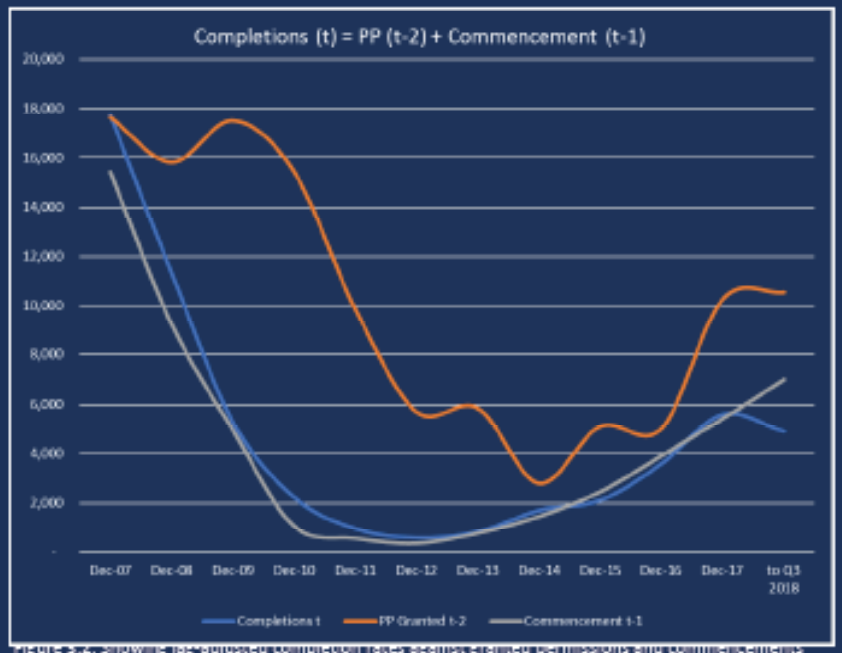

Figure 3.2: Showing lag-adjusted completion rates against granted permissions and commencements

Table 3.5: Estimated Reduction to Planning Applications (# of Units) due to an applied Rate of Trended Non-Completion

LA Area	Estimated Reduction to Planning Applications (# of Units) due to an applied Rate of Trended Non-Completion		
	Adjusted Granted	Adjusted Commenced	Adjusted Total
DCC	5,161	4,054	9,215
DLR	3,854	2,457	6,312
FCC	5,756	5,808	11,564
SDCC	2,350	2,388	4,739
Dublin	17,122	14,707	31,829

3.2 Unbuilt Residential Sites (URS)

Current and future residential development is closely linked to the availability and location of suitably zoned lands. Across the four Dublin LA areas, 752 Unbuilt Residential Sites (URS) have been identified, accounting for over 2,228 ha. of land (their locations seen in Figure 3.3).

As shown in Table 3.5, FCC has both the highest number of identified URSs and the largest available area for development, with SDCC and DLR following thereafter.

While development won't be confined to just these lands alone (redevelopment of existing residential zoned land, etc.), they provide a strong indicator as to where new large-scale development will take shape.

It should be noted that not all lands are equal in terms of their suitability for development, due to a range of considerations, not least of which finance, planning constraints[4] and environmental concerns. However, unlike most available lands outside of Dublin, these sites are largely situated in relative proximity to existing residential areas, allowing for a certain assumption on their serviced nature or at least serviced potential. To this end, URS sites were split into two groups, as detailed in section 3.4

[4] Plans to develop the Clonburris SDZ lands in SDCC are presently being appealed to An Bord Pleanála (July 2018). Having been delayed for more than 10 years, these lands have been excluded from this analysis due to their uncertainty.

Figure 3.3: Distribution of identified Unbuilt Residential Sites (URS)

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JANUARY 2019

The identified URSs are predominantly zoned for residential use, though some have been effectively reclassified as such under *Rebuilding Ireland*, where approx. 800 public and Local Authority lands nationally were earmarked for specific residential use (April 2017). Table 3.6 summarises the distribution of URSs across each LA area as seen visually in Figure 3.3.

FAC have determined URS boundaries as any residentially zoned lands which as of the end of 2018 did not show signs of being built-out. This expands upon initial LA assessments of sites in 2014[9], augmented by what has been built-out or rezoned via desktop and aerial imagery.

From this, FAC has determined that 77% of remaining unbuilt lands across the four Dublin LA areas have no granted or commenced planning activity on them, though planning applications under review or appeal have not been considered under this assessment.

For those that do have activity, SDCC is by far the most productive LA area in terms of its commencements, totalling 1,787 units (Table 3.7). This vastly exceeds commencements in URSs across the other LA areas. Though in all cases thousands of units remain granted.

Table 3.6: Identified Unbuilt Residential Sites (URS) by Local Authority Area and Land Area (ha.)

LA Area	Unbuilt Residential Sites (URSs) #	Unbuilt Residential Sites (URSs) %	Available Ha. #	Available Ha. %
DCC	144	19.1%	302.82	13.6%
DLR	193	25.7%	549.45	24.7%
FCC	231	30.7%	781.10	35.1%
SDCC	184	24.5%	594.90	26.7%
Dublin	752	100.0%	2,228.27	100.0%

Table 3.7: Nos. of Units in URSs by Local Authority Area and Status

LA Area	Nos. of Units by Planning Activity Status in URSs		
	Granted Units	Commenced Units	Grand Total
DCC	4,310	317	4,627
DLR	3,629	357	3,986
FCC	4,419	767	5,186
SDCC	3,657	1,787	5,444
Dublin	16,015	3,228	19,243

[9] Local Authority assessments of site boundaries in 2014, as part of the Residential Land Availability Study, were taken as a starting point. Sites built-out were then removed and additional and/or rezoned lands incorporated.

3.3 Estimating URS Typology

A major new policy of the NPF is an emphasis on infill development. A target to deliver at least 50% of all new housing within the existing built-up footprint of cities and 30% in towns and villages is restated within the draft RSES alongside specific references made to brownfield prioritisation and regeneration.

An effort has therefore been made to classify identified URSs in these terms[6]. The results of which indicate that much of the remaining suitably zoned available land across County Dublin falls into the 'Greenfield' and 'Exfill' categories, as illustrated in Table 3.8 and Figure 3.3.

In total, there is an estimated 1,031 ha. of Exfill lands across the four Dublin LA areas or 46.3% of total URSs area. Similarly, there is 1,197 ha. of estimated Infill lands, or 53.7% of total. FCC and SDCC have the highest number of Exfill sited lands, at approx. 542 and 317 ha. respectively.

Though this classification is just an estimate, some LAs such as FCC may encounter challenges for development on their sizable Exfill lands in favour of NPF directed Infill prioritisation.

[6] URSs were classified either 'Greenfield' or 'Brownfield' depending on whether the site exhibited signs of past or current development. Sites falling within existing settlement boundaries were classified as 'Infill' and conversely as 'Exfill'.

Table 3.8: Identified URSs by Estimated Typology and Land Area (ha.)

LA Area		URSs across each Local Authority by Land Area (ha.) and Estimated Typology				Exfill/Infill Totals	
		Brownfield	Greenfield	SDZ	Grand Total	Total Exfill	Total Infill
DCC	Infill	149.16	153.66	-	302.82	-	302.82
		149.16	153.66	-	302.82		
DLR	Exfill	9.76	539.69	-	549.45	172.48	376.97
		-	172.48	-	172.48		
	Infill	9.76	367.21	-	376.97		
FCC	Exfill	4.18	707.81	69.11	781.10	541.62	239.48
			472.51	69.11	541.62		
	Infill	4.18	235.30	-	239.48		
SDCC	Exfill	-	469.31	125.59	594.90	317.20	277.70
		-	191.61	125.59	317.20		
	Infill	-	277.70	-	277.70		
Dublin		163.09	1,870.48	194.70	2,228.27	1,031.29	1,196.98
% of Total		7.3%	83.9%	8.7%	100%	46.3%	53.7%

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Planning | Research | Economics

JANUARY 2019

3.4 Applying Suitability Assumptions

The development suitability of any given URS will vary according to a range of factors. In order to calibrate potential capacity with the potential reality on site, total URS land area was split into two distinct groups.

- **URS Total**: all URS land area as assessed
- **URS Short-Term**: a reduced URS land area calculation based on some sites being more realisable for development over the short term

Sites located outside of the main urban footprint of settlements are less likely to have an adequate provision of services and infrastructure, etc.

FAC have applied two globalised reduction rates to total lands in order to estimate a more realisable short-term capacity, as summarised in Tables 3.9 and 3.10.

- URSs located outside of established urban settlements, i.e. Exfill development, have had their reckonable land area reduced by *two-thirds*.

- URSs located within established urban settlements, i.e. Infill development, have had their reckonable land area reduced by *one-third*.

Table 3.9: Summary of URS Total Lands

LA Area	URS Total ('all lands')		
	Exfill URS Land Area (ha.)	Infill URS Land Area (ha.)	Total URS Land Area (ha.)
DCC	0.00	302.82	302.82
DLR	172.48	376.97	549.45
FCC	541.62	239.48	781.10
SDCC	317.20	277.70	594.90
Dublin	1,031.29	1,196.98	2,228.27

Table 3.10: Summary of URS Short-Term Lands

LA Area	URS Short-Term ('suitable lands')		
	Exfill URS Land Area (ha.)	Infill URS Land Area (ha.)	Total URS Land Area (ha.)
DCC	0.00	201.88	201.88
DLR	57.50	251.32	308.82
FCC	180.58	159.65	340.23
SDCC	105.75	185.14	290.89
Dublin	343.83	797.98	1,141.82

3.5 Potential URS Build-Out Capacity

There are many processes which influence the number of houses which can be delivered on sites and so delivery is often represented in terms of a density ratio, or the number of achievable units per hectare.

In order to derive a working figure for the potential capacity of all identified URSs, varying density ratios were assessed in line with guidelines set out under statutory plans or as previously assessed by Local Authorities.

The results indicate that there is significant variation in assessed achievable densities across Dublin, most notably due to the heightened ratios in effect in Special Development Zones (SDZs).

A series of corresponding median densities were then established based on the results of the site-specific assessments, as summarised in Table 3.11.

Focussing on URS Short-Term suitable lands, between 43,061 and 47,096 units could be achievable. Short-Term URSs within DCC are home to the highest potential build-out capacity, as summarised in Table 3.12.

Table 3.11: Identified URS site specific densities (informed by statutory plans, etc.)

LA Area	Median Density	Site Specific Densities
DCC	80	27 - 247
DLR	43	4 - 355
FCC	22	1 - 140
SDCC	35	20 - 90
Dublin	22 - 80	1 - 355

Table 3.11: Identified URS Total Potential Unit Capacity

LA Area	URS Total URSs	
	Median Density	Specific Density
	Potential Unit Capacity #	Potential Unit Capacity #
DCC	24,226	26,694
DLR	23,626	25,555
FCC	17,184	23,840
SDCC	20,821	22,154
Dublin	85,858	98,243

Table 3.12: Identified URS Short-Term Potential Unit Capacity

LA Area	URS Short-Term URSs	
	Median Density	Specific Density
	Potential Unit Capacity #	Potential Unit Capacity #
DCC	16,151	14,756
DLR	13,279	10,530
FCC	7,485	11,138
SDCC	10,181	6,637
Dublin	47,096	43,061

3.6 An Indication of Unit Completion

A 'timeline for delivering housing' can vary for many reasons. Schemes of different sizes, unit compositions, qualities and those dealing with planning and/or environmental constraints naturally complicate any estimate of when the existing pipeline might be built-out as intended.

Though imprecise, every application granted for development is given an expiry date reflecting what the anticipated delivery date might be. Observing both the distribution and location of these dates can provide an indication as to when permitted development must successfully complete, assuming it isn't approved for an extension of duration.

In that context, the assessment of planning activity within URSs across all four Dublin LA areas indicates that 23% of currently granted units are set to be delivered by 2020, a further 36% following thereafter to 2022, and nearly 41% have until 2023 to deliver.

At a LA level, 59% of granted units on URS sites in DCC have until 2023 to be delivered, indicating a rise in recently approved applications which is mirrored in each of the three other LA areas.

As overall development increases, additional activity will come on stream, supplementing the figures in Table 3.13.

Table 3.13: An estimate of When Granted Units on URSs must be completed by in order to avoid an extension of duration

LA Area	When Granted Units in URSs Must Be Complete (short of seeking an extension of duration)					
	2019	2020	2021	2022	2023	Total
DCC	9.1%	4.5%	11.4%	15.9%	59.1%	100.0%
DLR	12.2%	18.4%	18.4%	16.3%	34.7%	100.0%
FCC	14.5%	12.9%	17.7%	22.6%	32.3%	100.0%
SDCC	5.6%	14.8%	18.5%	20.4%	40.7%	100.0%
% of Total	10.5%	12.9%	16.7%	19.1%	40.7%	100.0%

15

4.0 Future Requirements

4.1 Housing Needs

In order to assess the housing need for Dublin's growing population, the simple but effective method of using average household size (AHS) has been employed.

AHS across Dublin in 2016 was 2.73, varying between 2.48 in DCC and 3.03 in FCC (Table 4.1). AHS has been declining steadily for many decades now, it stalled and increased in places in 2016 as a consequence of supply and affordability issues, however, the long-term pattern is likely to reassert itself in the coming years. In this assessment, an estimated reduction of 10% by 2026 and 15% by 2031 (or 1% per annum) was made on 2016's prevailing AHSs. Table 4.1 summarises the interaction between AHS and both population growth scenarios. The findings are described in terms of the number of homes required to accommodate the resulting changes in population.

By 2026, between 69,398 and 101,833 homes will be required, scenario depending. By 2031, the requirement will range between 104,781 and 145,102 homes.

Sustained per annum levels are shown in Tables 4.1 and 4.2. All LA areas will see increased demands for the provision of housing. Under the FAC scenario, an additional 32,435 to 40,322 homes will be required <u>over and above</u> what the NPF/draft RSES scenario identifies as a requirement.

Table 4.1: Summary of the number of Houses Required under NPF and FAC growth scenarios to 2026, and this requirement per annum between 2016 and 2026

LA Area	AHS in 2016	Est. AHS in 2026	NPF CH by 2026	FAC CH by 2026	NPF Houses Required by 2026	FAC Houses Required by 2026	NPF Houses Required P.A. '16-'26	FAC Houses Required P.A. '16-'26
DCC	2.48	2.23	70,446	104,061	31,562	46,622	3,156	4,662
DLR	2.72	2.45	27,482	34,058	11,226	13,913	1,123	1,391
FCC	3.03	2.73	36,980	64,256	13,561	23,563	1,356	2,356
SDCC	3.00	2.70	35,233	47,885	13,049	17,735	1,305	1,774
Dublin	-	-	170,141	250,260	69,398	101,833	6,940	10,183

Table 4.2: Summary of the number of Houses Required under NPF and FAC growth scenarios to 2031, and this requirement per annum between 2016 and 2031

LA Area	AHS in 2016	Est. AHS in 2031	NPF CH by 2031	FAC CH by 2031	NPF Houses Required by 2031	FAC Houses Required by 2031	NPF Houses Required P.A. '16-'31	FAC Houses Required P.A. '16-'31
DCC	2.48	2.11	100,446	134,758	47,650	63,927	3,177	4,262
DLR	2.72	2.31	38,982	48,222	16,861	20,857	1,124	1,390
FCC	3.03	2.58	52,980	89,084	20,571	34,589	1,371	2,306
SDCC	3.00	2.55	50,233	65,610	19,699	25,729	1,313	1,715
Dublin	-	-	242,641	337,673	104,781	145,102	6,985	9,673

4.2 Land Needs

A sufficient supply of zoned lands will continuously be needed in order to provide for the identified quantum of required housing.

By applying the aforementioned median density rates, a corresponding land requirement can be derived for the identified numbers of homes under both the NPF and FAC scenarios, as shown in Tables 4.3 and 4.4.

By 2026, in order to provide for between 69,398 and 101,833 homes across each of Dublin's LA areas, between 1,645 and 2,484 ha. of land will be needed.

Similarly, by 2031, to provide for between 104,781 and 145,102 homes, a requirement of between 2,486 and 3,591 ha. of land will be needed.

There is a continuously increasing requirement for housing on foot of demographic change under both the NPF and the FAC growth scenarios.

From now to 2026 and 2031 it can be seen that available URS Short-Term lands may not suffice for the observed requirements. This is assessed further in section 4.3.

Table 4.3: Summary of Land Required to fulfil identified Housing Requirements by 2026 under both NPF and FAC Scenarios

LA Area	NPF Houses Required by 2026	FAC Houses Required by 2026	Median Density	Land Required for NPF Houses	Land Required for FAC Houses	URS Short-Term URS (Ha.)
DCC	31,562	46,622	80	394.52	582.78	201.88
DLR	11,226	13,913	43	261.08	323.55	308.82
FCC	13,561	23,563	22	616.39	1,071.04	340.23
SDCC	13,049	17,735	35	372.84	506.72	290.89
Dublin	69,398	101,833	22 - 80	1,645	2,484	1,141.82

Table 4.4: Summary of Land Required to fulfil identified Housing Requirements by 2031 under both NPF and FAC Scenarios

LA Area	NPF Houses Required by 2031	FAC Houses Required by 2031	Median Density	Land Required for NPF Houses	Land Required for FAC Houses	URS Short-Term URS (Ha.)
DCC	47,650	63,927	80	595.62	799.08	201.88
DLR	16,861	20,857	43	392.11	485.05	308.82
FCC	20,571	34,589	22	935.03	1,572.23	340.23
SDCC	19,699	25,729	35	562.83	735.12	290.89
Dublin	104,781	145,102	22 - 80	2,486	3,591	1,141.82

4.3 Summary Findings

The capacity of Dublin's four LA areas to deliver housing for their future needs is closely linked to whether they have sufficient available lands to meet the rising requirements of a growing population.

In subtracting section 4.2's identified land requirements to provide houses under both the NPF and FAC scenarios, from the quantum of lands available as URSs in each LA area, it becomes apparent that certain surpluses and deficits will exist in 2026 and 2031.

When the median density rates are also applied as a means to convert the land requirements into unit requirements, the resulting unit surpluses or deficits here also become apparent.

Tables 4.5 and 4.6 overleaf summarise the under-provision of lands which arise under both growth scenarios.

By 2026, DLR is the only LA area which does not exhibit a land or housing deficit under the NPF/draft RSES scenario.

By 2026,

- DCC's unmet housing requirement will range between -15,411 and -30,472 units.
- DLR will range between a -633 deficit and a 2,053 unit capacity surplus.
- The unit requirement in FCC will range between -6,076 and -16,078 residential units and
- SDCC will have deficits of between -2,868 and -7,554 units.

In 2031, the level of requirement for both land and corresponding units rises significantly across all LA areas.

Both DCC and FCC exhibit significantly high needs for additional housing. However, relatively speaking, this is true for DLR and SDCC as well.

By 2031,

- DCC's unmet unit requirement will range between -31,499 and -47,776 units.
- DLR will range between -3, and -7,578, the 2021 capacity surplus having now dissipated.
- The unit requirement in FCC will range between -13,086 and -27,104 residential units, and
- SDCC will have deficits of between -9,518 and -15,548 units.

<u>Under both the NPF and FAC growth scenarios there is a very clear and pronounced need to immediately address the observed land and housing unit deficits.</u>

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Summary Findings

Comparing land and housing requirements under NPF and FAC growth scenarios with available land in Short-Term Unbuilt Residential Sites

Table 4.5: Summary of Derived Land and Unit Surplus/Deficits by 2026 under both NPF and FAC growth scenarios

LA Area	2026				
	Surplus/Deficit Land Requirements (ha.)		Median Density	Surplus/Deficit Unit Requirements	
	NPF Scenario	FAC Scenario		NPF Scenario	FAC Scenario
DCC	-192.64	-380.90	80	-15,411	-30,472
DLR	47.74	-14.73	43	2,053	-633
FCC	-276.17	-730.81	22	-6,076	-16,078
SDCC	-81.95	-215.83	35	-2,868	-7,554
Dublin	-503.01	-1,342.26	22 - 80	-22,302	-54,737

Table 4.6: Summary of Derived Land and Unit Surplus/Deficits by 2031 under both NPF and FAC growth scenarios

LA Area	2031				
	Surplus/Deficit Land Requirements		Median Density	Surplus/Deficit Unit Requirements	
	NPF Scenario	FAC Scenario		NPF Scenario	FAC Scenario
DCC	-393.74	-597.20	80	-31,499	-47,776
DLR	-83.29	-176.23	43	-3,582	-7,578
FCC	-594.81	-1,232.00	22	-13,086	-27,104
SDCC	-271.95	-444.23	35	-9,518	-15,548
Dublin	-1,343.79	-2,449.67	22 - 80	-57,685	-98,006

5.0 Conclusion

The intent of this report was to examine and qualify key influential factors in the provision of housing across the four Dublin LA areas, with respect to the EMRA draft RSES.

The draft restates an NPF-originated growth scenario which does not stack up to historic or recent data and which significantly under-provides for future needs.

This report has undertaken various assessments examining the impact of both this conservative NPF scenario and a more growth-orientated scenario developed by FAC using industry best-practice.

Many factors pertaining to and describing the provision of housing in Dublin were examined, including planning activity, the availability of suitably zoned lands for development, the projection of population under two scenarios, the resulting housing and land requirements and finally, whether the existing available land was sufficient to accommodate these future changes.

In its findings, this report has found that challenges in the provision of sufficient development lands is of immediate concern. Under both NPF and FAC growth scenarios, significant deficits in land and corresponding unit requirements are evident in 2026 and 2031.

In order to address these deficits, LA areas with large amounts of unsuitable zoned lands will come under pressure to resolve issues or face the need to zone or rezone additional sites. Should they fail to deliver these in a timely manner the provision of housing across County Dublin will continue to be at risk.

The NPF and indeed the EMRA draft RSES sets out many appropriate and welcome objectives, however, being underpinned by a conservative growth scenario puts the planning framework at risk of being quickly outdated.

Growth within Dublin and indeed the EMRA Region will not easily be capped in favour of more balanced Regional growth elsewhere. Policy-driven measures must seek to apply gradual change and LA areas must be capable of making appropriate changes to settlement and housing strategies in accordance with localised factors as much as their regionally-coordinated objectives and obligations.

This report has identified a requirement across Dublin's four LA areas of between 104,781 and 145,102 additional homes by 2031, a corresponding land requirement of between 2,486 and 3,591 ha., and a potential under-provision of available lands of between -1,343 and -2,449 ha.

Further information about the specific inputs, assessments and outputs of this research is available upon request from Future Analytics Consulting.

Appendix I

The FAC Population Projection Scenario

A projection premised upon a continuation of existing and prevailing trends in demographic growth rates and internal/international migration informs the 'as-is' projection scenario.

The projection of population is underpinned by the application of the demographic cohort component methodology (CCM); the same methodology as used by the CSO in preparing the national projections.

CCM is used internationally as the best-in-class practice for population modelling. It provides a flexible and granular approach to ageing the population and allowing for varying comparative scenarios to be assessed. Each scenario can be tailored around the application of qualified assumptions in mortality, fertility and migration. FAC has aligned with the CSO's assumptions under M1 and F1 in this instance.

The methodology applies key assumptions in fertility, mortality and migration year-on-year over the assessment period, at single year of age and gender. In doing so, the population is aged through the model, impacted by migratory inflows and outflows and mortality.

In considering a suitable basis for projection, FAC assessed a series of variables and influential factors, each with respect to the most recent national and regional assumptions published by the CSO, but also with specific regard to the county level profile of population observed in the latest Census 2016 data. Data and trends in fertility and migratory flows (both international, inter-regional and between settlements was incorporated.

A scenario named M1F1a(ligned)-R(ecent)-Adj(usted) or M1F1a-Radj was selected as the preferred option.

M1F1a-Radj relates to assumptions in fertility and migration (principally) which align with the CSO's published M1 and F1 outlooks (see below). It maintains the recent (inter-censally observed) net outward flow from Dublin, which we believe will not decrease towards net neutral by 2022 but is set to increase (as played out during the period 2002-2011).

Assumptions

- **Fertility**
  Full year fertility data for 2017 (*Vital Statistics*, CSO May 2018) was used to develop a baseline for each County's birth rate. Age-specific fertility rates were derived (births per thousand for women of child bearing age) and rates then linearly interpolated to achieve a Total Fertility Rate (TFR) of 1.8 by 2026. Therefore, this aligns with CSO F1 over the longer tail, but opts for a gradual reduction to 1.8 TFR so as not to over-adjust counties were fertility is presently above the national average.

- **Mortality**
  No change was made in using the published life tables from the CSO (*Irish Life Tables No. 16*, CSO July 2015), though it is recognised that mortality has fallen for men and women since their publication (the CSO have yet to publish updated data). The principal assumption of gains in life expectancy at birth from 77.9 years in 2010 to 85.1 in 2046 for males and 82.7 years in 2010 to 88.5 years in 2046 for females was carried forward.

- **Migration**

  The M1 CSO outlook for national net migration, assumes a steady continuation of high levels of net inward migration at 30,000 per annum, repeating. When this research was conducted, the latest available indication of net inward migration was 19,800 in 2017 and 34,000 in 2018. Therefore, M1F1aRadj assumes a gradual reduction back to the reoccurring level of 30,000 net inward beyond 2021.

  The continuation of high levels of net inward migration to 2031 is therefore premised on the prevailing trends which can be expected to continue in line with improving economic conditions of the economy at large and the pull of various sectors in attracting outside employees and students to Ireland.

  Migration was assessed at regional and at county level. A migration matrix was developed to simulate future inflows and outflows between counties, informed by inter county and settlement size flows (CSO, 2017). A generalised growth rate per county of 0.25% was applied to both inflow and outflow totals per annum and a specific spatial assumption applied to move migrants towards Dublin and the Mid-East generally. This forms the basis of the 'Recent' assumption as featured in the scenario name.

  This is in keeping with observed trends since 2006 and specifically carries forward the observed change in Dublin's net allocation. Unlike 2006-2011, where Dublin experienced a slight net inward surplus of migrants, Dublin has now returned to almost +4,500 net outward migrants per annum – as people settle in the surrounding counties, and this trend is set to continue.

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Appendix 2

Summary of Infrastructural Capacity of Lands at Newlands, Naas Road

Report Prepared by AECOM

Introduction

This report was prepared for Hibernia to accompany their submission the Eastern Region Spatial and Economic Strategy (RSES) to make the case that the subject lands become available in the short term for the provision of housing and associated services and facilities.

The subject Lands are currently in use as a mix of brownfield development (distribution warehousing) and agricultural use and total 144 acres. Immediately to the north of the Hiberina lands is the Red Cow Luas stop, and maintenance depot, as well as the Park and Ride facility.

The site is located South of the N7, East of the Belgard Road, North of the Kingwood Heights estate and west of the M50 and adjacent SDCC lands. The subject lands are is one of the most accessible large development sites in the Dublin region in terms of road and public transport access. It has easy access north and south via the M50 and east west via the N7 and Naas road, all of which are high capacity national primary routes. The lands are also excellently serviced by public transport provision as indicated in the following paragraphs.

Figure 9:
Public Transport Connections
(Existing & Proposed)

The principle reason for promoting this site is its accessibility and location along the South West Corridor which has recently been proposed as a Strategic Development Corridor in the RSES and the fact that it is fully serviced and has the primary infrastructure in place to allow for the site to be developed in the short term and at low cost to the State.

1

Public Transport

Luas Provision

The Luas Red Line runs within 10mins walking distance of the site and provides a high capacity public transport link to and from the city center. The Red Cow Luas Stop located to the north east of the subject lands is served by trams on the Luas Red Line between 5.30am and midnight. The service is very frequent, with an eastbound tram serving the Red Cow on average every 4 minutes between 7am and 7pm on weekdays with the ability to transport 4,000 passengers per direction per hour (ppdph).

The Luas Red Line connects the Newlands site with the city centre (approx. 20 minute journey time), in addition to stops at Heuston Station and Connolly Station. It also provides quick access to St. James's Hospital complex including the new Children's hospital, the Digital Hub and Docklands, or in an outbound/couner-peak direction towards destinations such as the Citywest Business Campus and Tallaght.

Initial investigations would also suggest that it may be possible to provide an additional Luas stop at the south of the Red Cow site which would allow further penetration of public transportto serve the site, thereby further reducing the reliance of cars travel and reducing the impacton the surrounding road network.

Proximity of the subject lands to existing public transport infrastructure and the exemplar design which will be proposed for the lands in terms of the prioritisation of sustainable travel modes means that the lands have the potential to accommodate residential development without severely impacting upon the capacity of the surrounding road network. Therefore, these lands have advantages over many of the sites located on the Strategic Development Corridors outlined in the RSES in their ability to deliver housing in the short term without any requirement for delivery of significant enabling infrastructure.

BusConnects Upgrade

The Dublin Area Bus Network Redesign proposals published by the National Transport Authority in June 2018 will greatly enhance public transport connectivity to and from the subject lands. It is currently envisaged that the network re-design will be implemented during 2020, aspects of the proposals which will most benefit the subject lands include:

- Route W2 (Tallght - Liffey Valley) will serve Belgard Road every 15 minutes on weekdays;
- Route S4 (Liffey Valley - UCD) accessible with one interchange at either Kylemore Luas stop or Walkinstown Road / Ballymount Road junction (via the new bus route 20) will provide much improved access to UCD & Clonskeagh, as well as to the Luas Green Line & N11 Corridors;
- Route 255 (Balgaddy - Clondalkin - Red Cow) would provide a direct connection between Clondalkin & the Red Cow Luas stop & is proposed to run every 15 minutes;
- Route 20 (College Green - Kingswood) is proposed to operate every 15 minutes at peak time along Ballymount Road, south of the subject lands;
- D3 bus route (accessible from the Kylemore Luas Stop) located South of the Luas Red Line, this route will provide improved journey times to Southern parts of the City Centre as well as inner suburbs along the route.

According to the NTA's Draft Integrated Implementation Plan 2019-2024, it is intended that half of the total kilometres of the radial corridors included in the Core Bus Network will be delivered by 2024, with the remainder delivered between 2025 and 2027.

Six orbital routes are also proposed for development as part of the network of Core Bus Corridors, including a Tallaght – Blanchardstown corridor which it is assumed will run along Belgard Road to the west of the subject lands (the proposed W2 route in the Bus Network Redesign proposals).

Once again, the subject site's proximity to a number of high frequency bus corridors will allow any proposed development to make maximum use of public transport provision in the area.

Bus Provision

The Gateway site also benefits from good access to the Dublin Bus network with a number of bus stops and associated bus routes located in close proximity to the site boundaries. Dublin Bus routes 13, 68 and 69 which pass the site provide high frequency and high capacity services to/from the city centre to Grangecastle, Newcastle and Rathcoole respectively. In addition, Dublin Bus routes 13, 51X, 68, 69 provide additional services towards the city centre. The 56a to Tallaght serves Ballymount Road (south of the subject lands) while the 76 and 76a to Tallaght and Chapelizod serve Belgard Road to the west of subject lands.

Inter-City / Regional Bus Services

A very large number of inter-city and regional coach services stop at the Luas Red Cow Park & Ride. While these may have limited relevance to daily commuting for most potential future residents, the availability of these services will help to suppress the demand for car ownership amongst residents who need to make regular trips to any of the destinations served by these routes (e.g. to visit family or for other personal or business reasons). Currently, Dublin Coach offer four different frequent routes, including: an N7 24-hour service to Portlaoise with an hourly frequency; an M7 express service to Limerick, Ennis and Tralee (every half hour to Limerick, hourly to Ennis and 9 services/day to Tralee); an M9 express service to Kilkenny and Waterford every two hours; and direct services to Dublin Airport and Dundrum every half hour. Other operators including JJ Kavanagh, Bus Eireann and Kenneally Bus also operate numerous services every day to Limerick, Clommel, Kilkenny, Athy, Naas, Waterford, Kildare and Carlow, with most of these also serving some intermediate destinations.

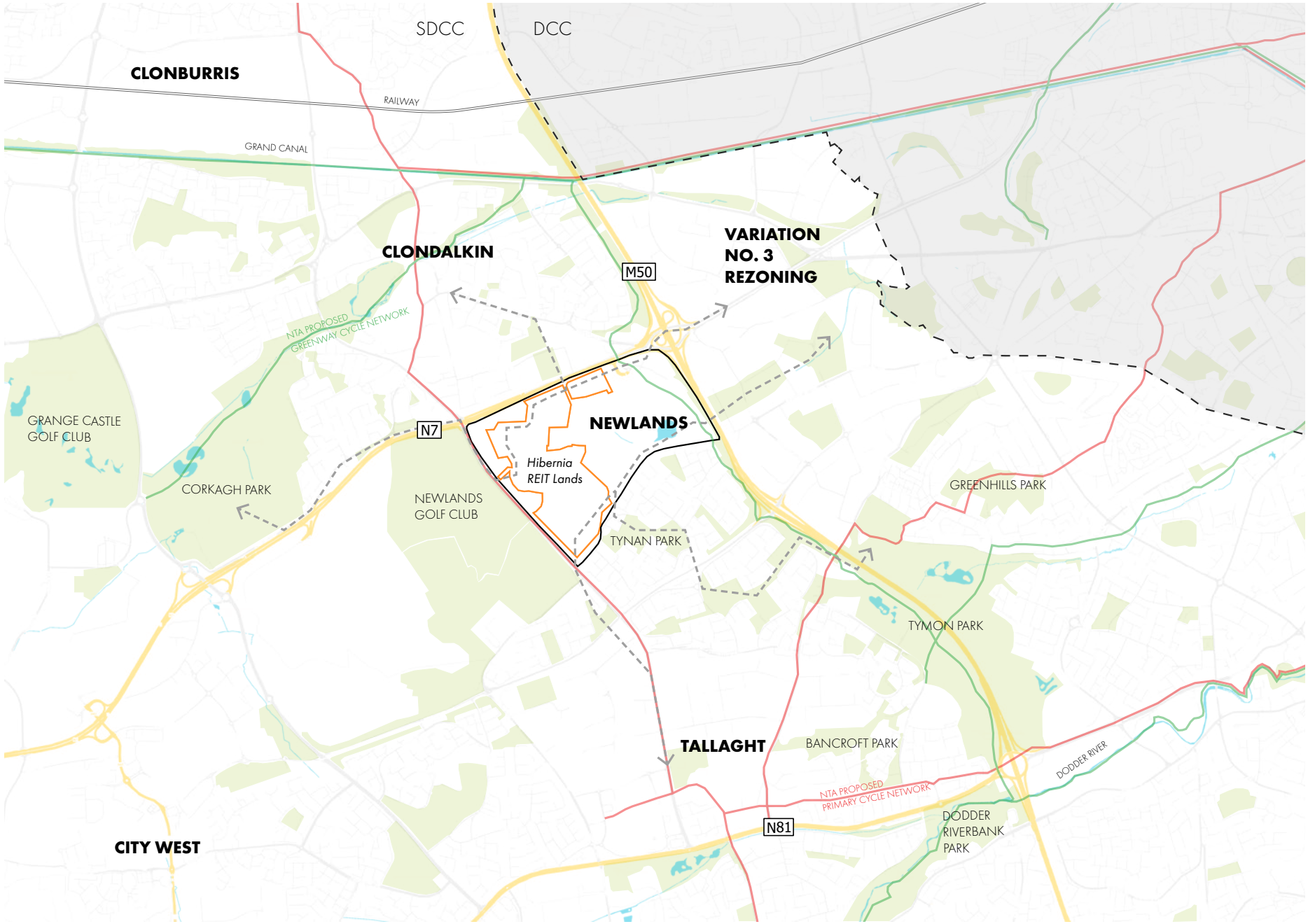

Figure 10:
Cycle Connections

2 Walking & Cycling

The subject lands are located within an easy cycling distance of many significant employment areas, including Tallaght Village (approx. 3km), Cookstown Industrial Estate and Broomhill Industrial Estate in Tallaght (approx. 2.5km), Park West Business Park (<4km), Grange Castle Business Park (approx. 6km). The Gateway site is also less than 10km from the city centre and therefore would also be considered a feasible commuting distance for many cyclists, with an estimated journey time of less than 30 minutes.

The Greater Dublin Area (GDA) Cycle Network Plan, published by the NTA in December 2013, includes proposals for a comprehensive network of primary, secondary and 'feeder' cycle routes throughout the GDA. In the vicinity of the subject lands, the proposals include a primary cycle route to the west side of the lands, secondary and greenway routes along the periphery and a local feeder routes along the southern side of the N7. Many of the key radial sections of the GDA Cycle Network Plan are anticipated to be delivered as part of the Core Bus Corridors project mentioned previously.

The GDA Cycle Network Plan already proposes a new cycle bridge over the M50 which would provide an alternative route to the Nass Road towards Walkinstown roundabout. The delivery,of a pedestrian and cycle bridge at this location would significantly improve accessibility for,these modes to lands from the east.

Walking will be a less significant mode in comparison to cycling for external trips. However, a,high walking mode share for internal trips as well as highly attractive walking routes to internal,and external public transport nodes will be designed into the development.

3

Road Access

A number of alternative locations have been identified where vehicular access to the subject lands could be provided utilizing the existing local road network surrounding the Newlands Site. Combined with the proposed extensive measures which will support sustainable transport modes, a large-scale residential and mixed use development can be accommodated on these lands with limited material impact on the adjoining national roads (N7/M50).

The proposed design for the subject lands will reflect a modal hierarchy which gives priority to active and sustainable modes over private car use and car ownership. The internal road layout will follow the principles of the Design Manual for Urban Roads and Streets (DMURS) and quality pedestrian infrastructure will be provided, including a highly permeable street network which will provide convenient access to key public transport nodes, town center facilities, schools and employment. An extensive network of cycle facilities will be provided throughout the development which will be designed in accordance with DMURS and the National Cycle Manual.

A sustainable travel culture will also be supported by the provision of a reduced rate of parking in comparison to current South Dublin County Council maximum rates and the implementation of comprehensive parking demand management strategy.

4

Site Utilities

A review of the utility records from the relevant statutory bodies and utilities providers has been undertaken to inform this report to determine how best to connect the development of the 144 acre lands into the existing infrastructure that serves the surrounding areas. All required services are available in the immediate vicinity of the site and can be connected into without significant delay. The next stage of this study is to develop the detailed planning of each utility to determine the capacity of the services required in a phased sequential manner based on a highly efficient and sustainable approach. When this is complete Hibernia would arrange to sit down with the relevant statutory bodies and utilities providers to allow for their input and for them to allow the planning of any enhancements of their networks required.A brief summary of the existing services serving the Newlands Site are:

Telecoms and Broadband
There are telecommunication connections points along the perimeter of the site. Virgin Media and Eir have extensive existing underground services. There are also existing BT underground services which run the length of the Belgard Road.

ESB Network
Underground ESB Networks services run along the length of the Belgard Road at the western boundary of the site, power supply could be potentially drawn from the existing ESB Networks utilities and be drawn into the development.

Gas Transmission
There is an existing gas transmission pipe running the length of the Naas Road at the northern boundary of the subject site. A gas transmission line can therefore be drawn into the development and will extend around the site.

District Heating
The introduction of a gas fired Combined Heat and Power (CHP) District Heating is proposed for the development. CHP effectively uses waste heat from the electricity generation process to provide useful heat for space and water heating; the advantage of this system is that it leads to higher system efficiencies when compared to a typical supply arrangement of grid-imported electricity and conventional heat boilers. CHP is considered a low carbon technology when fired by natural gas, to generate electricity and provide heating and hot water. It is proposed that the CHP system be used in conjunction with the District Heating network to serve the development with heat in the form of hot water from multiple networked centralised energy centres.

Foul Water Drainage
There are several locations where the masterplan lands could connect to the existing foul network which runs under the M50 motorway and ultimately discharges to Ringsend Wastewater Treatment Plant. The foul sewer infrastructure will be enhanced in order to deliver the full development potential of the 144 acre site.

Surface Water Drainage and Attenuation
The Development at Newlands would embrace Sustainable Urban Drainage Systems SUDs to manage storm water. Attenuation ponds and watercourses systems would be incorporated thus replicating nature and introducing environment's which will sustain biodiversity. The systems employed would replicate the greenfield run-of rate in line with best practice is achieved.

Water Supply
The area around the Newlands site is well served by Irish Water existing watermains. Connection to the existing 300mm diameter watermain on the southern side of the Naas Road would be favoured.

5 Sustainable Approach

The development would embrace a low carbon footprint and include a number of sustainable indicatives. Buildings would be designed to utilise passive design principles and would be well insulated and meet rigorous airtight testing. Low carbon modal travel is to be encouraged with active transport such as cycling and walking designed into the masterplan. Large areas of open space and landscaping would address SUDs needs and also promote bio-diversity. The introduction of a gas fired CHP District Heating is proposed for the development. The CHP system can be used in conjunction with the District Heating network to serve the development with heat in the form of hot water from multiple networked centralised energy centres. Photovoltaic (PV) Cell technology and heat pump technologies would be suitable for use with individual buildings such are schools, offices and apartments. Water usage will be significantly reduced through extensive use of rainwater harvesting systems in conjunction with emerging smart technologies.

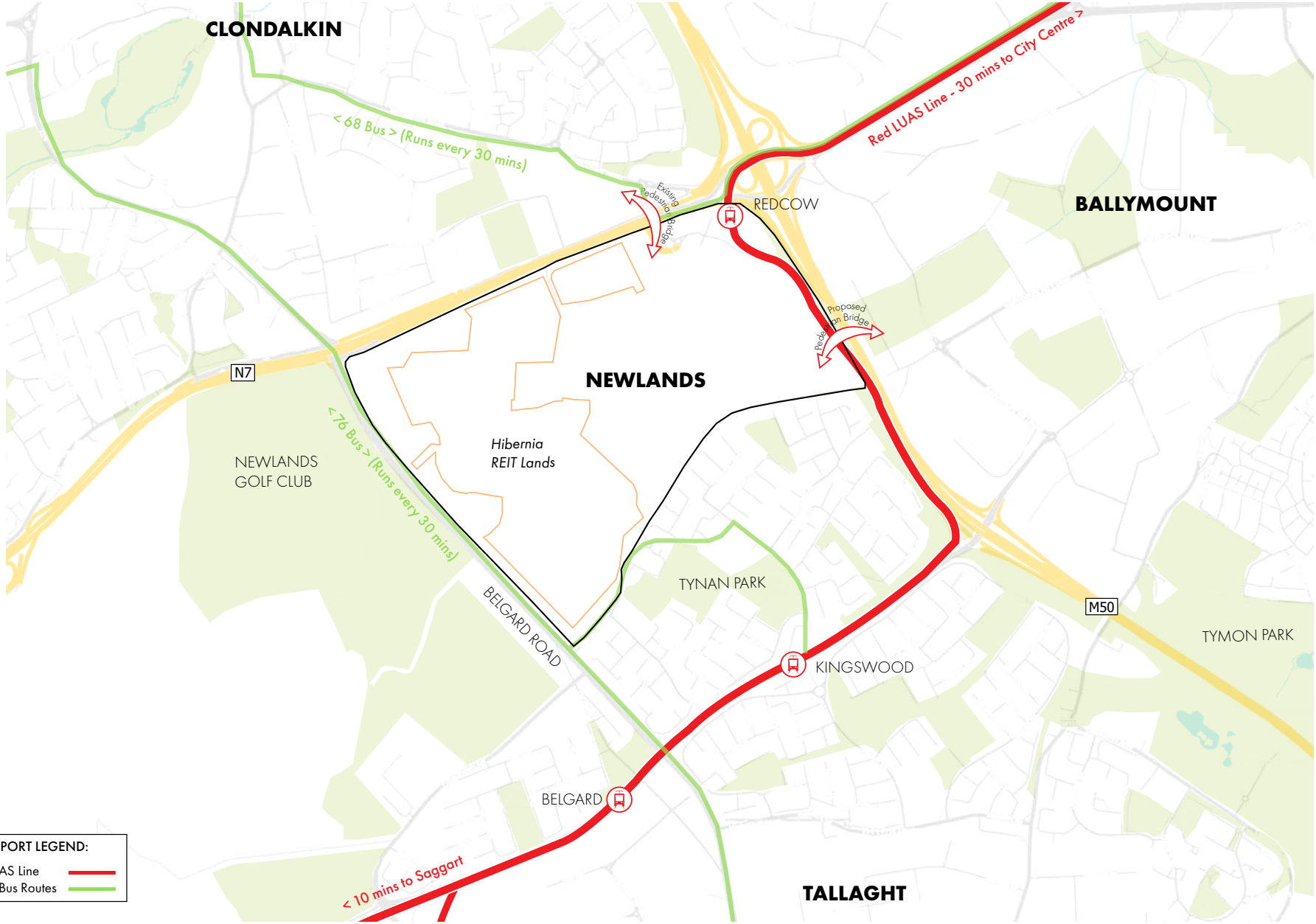

Figure 11:
Existing Public Transport

Appendix 3

Guiding Principles for Dublin's Growth - Section 5.3 of MASP

Guiding Principles

Section 5.3 of the draft MASP sets out the Guiding principles for the growth of the Dublin Metro Area. In particular we would like to highlight the following Guiding Principles, and to provide some observations to same:

1

Compact Sustainable Growth -

Promote consolidation of Dublin city and suburbs, refocus on the development of brownfield and infill lands to achieve a target of at least 50% of all new homes within or contiguous to the existing built up area in Dublin.

Observation -

This needs to be spelt out in greater detail how and where at least 50% of Dublin's new housing is to be provided within the city & suburbs.

2

Intergrated Transport & Land Use -

Target growth along high quality public transport corridors and nodes linked to the delivery of key public transport projects including BusConnects, DART expansion and Luas extension programmes and the Metro Link, along with better integration between networks.

Observation -

MASP should include a specific Regional Policy Objective (RPO) to undertake a detailed study to identify and establish future housing capacities along these transport corridors.

3

Accelerate Housing Delivery -

Activate strategic residential development areas and support the steady supply of sites to accelerate housing supply and the adoption of performance-based standards to achieve higher densities in the urban built up areas, supported by better services and public transport.

Observation -

While the MASP does recognise that the lists of sites identified along the strategic corridors are not exhaustive (see for example Section 5.7 dealing with phased sequential development in Housing Delivery), it does not set out how further sites are to be identified or brought forward for development, and what criteria are to be applied.

4

Future Development Areas -

Having regard to the long lead in time for planning and development, identify future growth areas such Dunsink, Swords-Lissenhall and Naas Road that may be delivered beyond the lifetime of the draft RSES within the long term 2040 horizon of the NPF.

Observation -

Very few long term strategic housing sites have been identified in draft MASP – require further sites to be identified now.

5

Enabling Infrastructure -

Identify infrastructure capacity issues and ensure water / waste water needs are met by national projects and improve sustainability in terms of energy, waste management and resource efficiency and water, to include district heating and water conservation.

Observation -

In addition to identifying infrastructure capacity constraints, need also to identify those areas which have infrastructure capacities but which are under-utilised and are suitable for housing or mixed uses.

6

Co-Ordinating & Active Land Management -

Enhanced co-ordination across Local Authorities and relevant agencies to promote more active urban development and land management policies that focus on the development of underutilised, brownfield, vacant and public lands

Observation -

Strongly support heightened co-ordination and more pro-active land management by local authorities across the Metro area. Suggest that the Regional Assembly plays a more active role to ensure this is consistently implemented.

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