

Heather Cooke

From: Deirdre O'Connor <info@emra.ie>
Sent: 23 January 2019 12:09
To: RSES
Subject: RSES - Online submission
Attachments: 5c485970dd79d.zip

Follow Up Flag: Follow up
Flag Status: Flagged

From: Deirdre O'Connor <[REDACTED]>
Organisation: NAMA

Message Body:
Dear Sirs

Please see attached submission to the Draft RSES on behalf of NAMA.

best regards

Deirdre

This e-mail was sent from a submission form on Eastern & Midland Regional Assembly (<http://emra.ie>)

████████████████████



Gníomhaireacht Náisiúnta um Bhainistíocht Sócmhainní
National Asset Management Agency

Mr Jim Conway
Eastern & Midland Regional Assembly
3rd Floor North
Ballymun Civic Centre
Main Street
Ballymun
Dublin D09C8P5

Wednesday, 23rd January 2019

**RE: DRAFT REGIONAL SPATIAL AND ECONOMIC STRATEGY (RSES) FOR THE EASTERN
AND MIDLAND REGIONAL ASSEMBLY**

Dear Sirs

OVERVIEW

We refer to the above mentioned Draft RSES for the Eastern and Midlands Regional Assembly and to your public notice inviting comment on the Draft by 23rd January 2019. The National Asset Management Agency (NAMA), Treasury Building, Grand Canal Street, Dublin D02 XN96, welcomes the opportunity to make the following observations on the Draft. NAMA continues to hold security over considerable land banks in the Dublin Metropolitan area and beyond and generally welcomes the preparation of the Draft Scheme which is intended to implement at a regional level the strategic objectives of the National Planning Framework (NPF).

THE NATIONAL PLANNING FRAMEWORK

The NPF seeks to accommodate in a sustainable way the anticipated one million population increase between now and 2040. This growth will generate a requirement for 550,000 additional dwellings and in this context, the NPF seeks to distribute this population in a way that supports and grows the established city regions of Cork, Limerick, Galway and Waterford and consolidates growth in Dublin City and the Dublin Metropolitan Area. Specifically, each of the regional city regions is targeted to grow their existing population by 50%, while for the Dublin Metropolitan Area (DMA), the population growth rate is set at 25% to 2040.

This means that at a regional level the two regional assemblies outside Dublin will accommodate 50% of the anticipated population (the North / West and Southern Regions) with the remaining 50% taking place in Dublin and the Eastern Region. The objective is to ultimately move towards “regional parity” by 2040, with improved mobility, communications, energy systems and public services/facilities in other regions to counter the legacy dominance of Dublin.

The detail around how the population targets will be achieved in each of the relevant Counties is left over to the RSES and it is this detail around population targets that will inform Development Plan core strategies that forms the basis of our submission.

POPULATION TARGETS FOR DUBLIN AND THE EASTERN REGION

Setting a growth rate of 25% to 2040 for the DMA means that the population targets set in the Draft RSES for the relevant administrative areas and that determine the core strategies of the appropriate Development Plans, are lower than anticipated in current Plans. This has obvious implications for the quantum of lands zoned for residential development.

For example, the population of Dublin City was 554,500 at the 2016 Census. The population target in the City Plan anticipates this population will increase to 606,110 over the six years to 2022 based on growth targets set in the current Regional Planning Guidelines for the Greater Dublin Area as endorsed by the Department of Housing. This represents an increase of 9.3% (1.55% pa) over that period and is reasonable based on historical growth patterns.

THE FOUR DUBLIN LOCAL AUTHORITIES

The Draft RSES however, identifies a population target (low) of 613,000 for the Dublin city area up to 2026, representing an increase of 1.06% pa over the ten year period 2016-2026.

Settlement	2016 Census	Dev Plan Target 2022	% Change 2016-2022 (pa equivalent)	RSES Low Target to 2026	% Change 2016-2026 (pa equivalent)
Dublin	554,500	606,110	9.31% (1.55%)	613,000	10.55% (1.1%)
Dun Laoghaire	218,000	240,338	10.25% (1.71%)	241,000	10.55% (1.1%)
Fingal	296,000	309,285	4.49% (0.75%)	327,000	10.47% (1.1%)
South Dublin	279,000	308,467	10.56% (1.76%)	308,000	10.39% (1.0%)
4 Dublin's	1,347,500	1,464,200	8.66% (1.44%)	1,489,000	10.50% (1.1%)

Table 1: Population Targets – 2016 Census v Draft RSES

Whilst it may appear that the annual equivalent growth rate between the two dates (2016-2022 in the Plans and 2016-2026 in the Draft RSES) is only marginally different, the population trajectory between 2016 and 2022 is in train and cannot be abruptly halted/reversed as planning decisions have been made to affect the 2022 population targets. For example, the granting of permission for an apartment scheme of say 500 units would potentially introduce a population of between 500 and 700 to an area. In other words, while the NPF policy approach is 'disruptive', it is not possible to implement with immediate effect and needs to be allowed to take effect over a number of Development Plan cycles.

A more revealing exercise therefore is to compare the 2022 Development Plan core strategy targets (the achievement of which are already in train) with the draft RSES 2026 targets to understand the implications for the quantum of land zoned for development.

Settlement	Dev Plan Target to 2022	RSES Low Target to 2026	% Change 2022-2026 (pa equivalent)
Dublin	606,110	613,000	1.14% (0.29%)
Dun Laoghaire	240,338	241,000	0.28% (0.07%)
Fingal	309,285	327,000	5.73% (1.43%)
South Dublin	308,467	308,000	-0.15% (NA)
4 Dublin's	1,464,200	1,489,000	1.69% (0.42%)

Table 2: Population Targets – Dublin Development Plans vis-a-vis Draft RSES

[The above analysis is based on the Draft RSES low population targets. The Strategy also includes high targets but the difference between the two is under 2%.]

What is evident from the above is that the population increases, targeted between the end of the current Dublin Development Plan cycles (and which cannot and should not be halted) and the 2026 low target, would not require any additional zoning of land, with obvious implications for land values and the supply of serviced land for much needed residential development. While this may not impact Dublin to any significant extent as there are limited opportunities for re-zonings or for new zonings and in any event, confirmed and sensible land management policies would support the continued development of under-utilised, brownfield sites and vacant sites within the built-up area, the case for adjoining counties is not so clear-cut.

COUNTIES ADJOINING DUBLIN

The equivalent analysis that compares current Development Plan targets with the RSES to 2026 provides a more stark potential outcome in particular for Kildare.

	2016 Census	Dev Plan Target to 2023	RSES Low Target to 2026	% Change 2023-2026
Kildare County	222,500	252,640	249,000	-1.44%
Meath County	195,000	210,260	216,000	2.73%
Wicklow County	142,500	158,000	155,000	1.90%

Table 3: Population Targets – Development Plans vis-a-vis Draft RSES

The implications of seeking to reverse the population trajectory of towns in Counties Kildare, Meath and Louth ostensibly on the basis that they are not within the Dublin Metropolitan Area but that are serviced with public transport, community and social infrastructure, reveals the shortcomings of seeking to implement 'disruptive' regional planning objectives over such a short time period. Such a radical change in policy direction cannot and should not be implemented over a single Development Plan cycle and consideration must be given to the potential risks for land availability that this disruptive policy might bring in the short term.

In preparing population targets, consideration should also be given to Government investment in costly infrastructure, including public transport infrastructure that reduces carbon footprint and contributes to sustainable land use management.

Seeking to halt and reverse the population trajectory that is already in train and where planning permissions for significant residential development have been granted in the interim ostensibly on the basis of meeting what might be considered to be theoretical population targets in towns serviced with public transport, community and social infrastructure, reveals the shortcomings of this policy, particularly in towns that are centres of employment in their own right and where workers commuting to the town from elsewhere because of lack of housing.

RECOMMENDED CHANGES

What all of this means is that the established planning policy direction has been disrupted with the publication of the NPF, the implications of which are now evident on foot of the issuing of the Draft RSES. In this context, it is suggested that the population targets are revisited to acknowledge that the core strategy targets set in existing Plans are being realised in the three or four year intervening period between the adoption of Development Plans in 2016/2017 and the preparation of the RSES. This will require population targets to be increased, but this approach would not be counter to the objectives of the NPF which acknowledges the need to balance many factors in affecting regional development and would not undermine the pattern of development that the NPF seeks to achieve.

Importantly, It would avoid a scenario where County Development Plans and Local Area Plans for towns within Counties adjoining Dublin have no or limited potential for further zonings. Such an approach would fail to have regard to the availability of services and infrastructure and the costly investment in such infrastructure; could feasibly reduce competition in the land market; ignores the complexities of land assembly, servicing and issues around viability; and places an over dependence on certain sites to deliver residential development.

To conclude, the achievement of the population targets and pattern of development set out in the NPF cannot be affected over a single Development Plan cycle. Such change must take place over a generation at least and in any event, confirmed and sensible land management policies would support the continued development of serviced lands within established settlement centres that have the key ingredients to make successful new urban communities. This approach does not undermine the overall objectives of the NPF.

Yours faithfully



Deirdre O'Connor MIPI, MRTPI

Head of Planning

National Asset Management Agency