

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

Date: January 23, 2019

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

Dear Sir, Madam,

Property Industry Ireland (PII) is an independent and inclusive representative organisation for all sub-sectors of the Irish property industry. We welcome the opportunity to comment on the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region and remain available should you have any questions in relation to our submission.

#### **Zoning and the Development Process**

A key concern for PII members is the availability of an adequate supply of land for development, in particular for the much-needed housing development. The zoning of land, servicing of land and land availability, and the development process are all inter-related. Indeed, much of the challenge in providing affordable housing throughout the country comes from the lack of a sufficient amount of serviced land zoned for residential purposes that is made available to the market.

Such a restriction increases the cost of land, feeding directly into the cost of housing. In addition, while the latest residential land availability survey (2014) indicated that there is enough land zoned for Ireland's housing needs to 2022, this fails to take account of the fact that not all of this land can be counted as available for development as it may remain in agricultural use or may be unviable to develop and will remain in its current use.

**Recommendation:** PII therefore recommends that a viability and feasibility assessment should be undertaken on any site a Development Plan intends to zone for residential development.

In addition, there is a mismatch in the current practice of zoning land and the development process. The length of time for the process, from initial site acquisition to completion of construction, can easily cross successive Development Plans. The experience in Metropolitan Dublin is that it can take up to between 6 and 12 years or more, depending on the complexity of the planning context, including the need to prepare a Local Area Plan or Planning Scheme in the case of many large-scale sites.

While this may seem an excessive timescale, it is necessary to recognise this reality to acknowledge the housing delivery in practice can take much longer than 6 years to ensure that current housing supply shortages are not exacerbated in the short and medium term. This adds an inherent risk to the development process which is completely unnecessary as it does not benefit society or lend itself to plan-led development.

In the joint Ibec-PII report *Better housing: Improving affordability and supply*<sup>1</sup>, we recommend that all local authorities should be required to conduct strategic land reserve assessments to promote sustainable residential development objectives. In our submission to the issues paper, we commented on the overly conservative population projections used in the National Planning Framework and such Strategic Land Reserve Zoning practices would go some way in allowing flexibility in the system until such time as the NPF/RSES/Local Development Plans are revised.

In addition, the practice of providing a headroom allowance leading to an additional 50% of land being zoned for residential development compared to projected land supply requirements for the 6-year development period, while providing essential flexibility, has not been sufficient for long-term planning. It is very important that this 50% headroom provision on land supply is retained and we respectfully request that it is explicitly referenced in the strategy on page 42 in the section "Headroom".

**Recommendation:** PII therefore recommends the introduction of the identification of sites for development in the short term (to be developed within the lifetime of the current Development Plan – category 1), medium (to be developed within the lifetime of the subsequent Development Plan – category 2) and longer (expected to be developed at a later date within the next 15 years - category 3) term.

It is also submitted that the wording of Development Plans should provide for flexibility and allow for medium to long term sites to come forward if housing delivery targets are not being met. This indicative zoning for sites in the future would allow for suitable community infrastructure to be developed in a sustainable manner whilst also facilitating flexibility in the system to allow for changing circumstances.

Local Authorities should retain the option to upgrade category 2 sites to category 1 in the lifetime of the current development plan in-line with the recommendations on Strategic Land Reserves i.e. where the development of preferred locations is not possible without additional infrastructure and services installation. Only land that has been identified as category 1 should be counted as whether the headroom has been met.

### **Soil Waste Management**

In addition, given the focus on infill development in the NPF and RSES, Local Authorities should take into account the expected increase in demand for management of soil removed from sites. Much of this soil may require extensive treatment before being classified as no longer waste and appropriate facilities should be provided to address this.

**Recommendation:** PII recommends that a review be undertaken of current capacity and the expected demand for solid treatment under the RSES.

Yours faithfully

*Sent by e-mail*

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**David Duffy**

**Director**

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<sup>1</sup> [https://www.propertyindustry.ie/Sectors/PII/PII.nstr/vPages/Publications~better-housing-improving-affordability-and-supply-18-06-2018/\\$file/Ibec-PII+Better+Lives+Better+Business+-+Housing+Report.pdf](https://www.propertyindustry.ie/Sectors/PII/PII.nstr/vPages/Publications~better-housing-improving-affordability-and-supply-18-06-2018/$file/Ibec-PII+Better+Lives+Better+Business+-+Housing+Report.pdf), p64