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Eastern & Midland Regional Assembly
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EASTERN & MIDLAND
16 APR 2019
REGIONAL ASSEMBLY

11th April 2019

Proposed Material Amendments to the Draft Regional Spatial and Economic Strategy 2019-2031 for Eastern & Midland Regional Assembly.

Dear Sir,

The Publication by the Eastern & Midland Regional Assembly of the proposed material amendments to the Draft Regional Spatial and Economic Strategy is welcomed by the Construction Industry Federation.

I set out below Federation comments in relation to a number of the amendments for your appropriate attention.

1. Amendment No 6 and throughout the Draft Strategy: Compact Urban Growth

The aspirations set-out in the Regional Spatial & Economic Strategy supporting compact urban growth are supported in principle. Nevertheless, one must recognise the constraints that apply for a strict implementation of planning policy calling for a density of 35 housing units per hectare in development proposals. There are many suburban areas and regional towns where a density of 35 units per hectare is simply unsustainable and unviable. Densities of this scale require the construction of apartments and duplex units alongside a relatively small number of traditional family type homes.

In many towns, a mandatory requirement for a density of this scale simply sterilises the development land as the market will not respond to a density of this scale, nor will the development funding industry support investment in projects of this nature. The demand for new homes in many of these areas is such that a much lower density enabling the construction of a greater proportion of family type homes is the only viable option for renewal of residential building in these areas.



While references are made throughout the proposed material amendments to the Draft Regional Spatial and Economic Strategy to 'Compact Urban Growth', it is suggested that the Strategy should provide that planning authorities be given the flexibility to consider lower densities in development sites on a case by case basis where these can be supported following the submission by the land owner of a suitable 'Economic Viability Assessment' for residential development of the lands in question. This Economic Viability Assessment can address market demand, market pricing, suitability of propose housing types for market, together with the perspectives of development funders and their support of such types of development.

2. Amendment No 13: Section 43 Taking Accounts of Existing Plans

The additional guidance included in the proposed material amendments providing that Core Strategies should apply 'prioritisation measures' rather than 'de-zoning' of lands where a surplus of zoned lands is identified in existing plans with regard to the NPF Implementation Roadmap up to 2031 is fully supported.

The additional provision that, in preparing Core Strategies, account should be given to the consideration of sequential lands which are suitable for the delivery of housing but may not be forthcoming in the Plan period having regard to 2031 Roadmap targets, subject to proper planning sustainable development is supported.

However, in terms of the 2031 Roadmap targets, the Federation continues to express its concerns in relation to the conservative projections for population growth to 2031. This is with specific reference to the underestimation of levels of immigration included in the Roadmap population projections as referenced in the Federation's Submission to you dated 21st January 2019.

3. Amendment No 120: Amend Guiding Principles for Urban Infill and Brownfield Regeneration.

While the development of infill / brownfield lands is fully supported by the Federation, recognition of the longer planning timeframe required for renewal of development in these areas must be recognised in terms of overall zoning of lands provided for in local authority development plans. The proposed additional guidance in Section 9.5 of the Regional Strategy *Regeneration -Compact Growth* providing for the establishment of a database of strategic brownfield and infill sites as part of the active land management process, and the identification of the development capacity and any constraints on sites that are zoned for development including the potential contamination etc is welcomed and fully supported.

However, such constraints should also be recognised in terms of overall residential zoning of lands in areas so that, in the event of such brownfield sites not being developed in the short term or in the lifetime of the development plan, a shortage of other zoned land to meet the development needs of the housing sector does not prevail in the interim.



4. Amendment No 64: RPO 4.51 - Rural Areas

Provision for the development of a “New Homes in Small Towns and Villages” initiative is fully supported by the Federation. This will be a welcome initiative in supporting renewal of development in small towns and villages and support the principle of achieving more compact growth and usage of public services in these areas.

The Federation will appreciate if these points can be taken into consideration by the members of the Regional Assembly in their final adoption of the Regional Spatial and Economic Strategy for the Eastern & Midland Regional Assembly.

Should any clarification be required in relation to any of the foregoing, please don't hesitate to give me a call.

Yours sincerely,



Hubert Fitzpatrick
Director

