

Submission
on Ireland 2040
**National Planning
Framework**



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Executive Summary

Executive Summary

Dublin Chamber commends Ireland 2040: Our Plan, which provides an ambitious vision and realistic policy framework to enable sustainable population and jobs growth across all regions up to 2040.

The National Planning Framework is the best way forward for Ireland. However delivering on its ambitions will require getting a lot right including, but not limited to, sustained and targeted investment in the supporting infrastructure, much improved governance and regional planning structures and not least, political will.

Our submission gives the views of Dublin business on why the NPF matters and what needs to happen for it to be effective.

Balance of Regional Development: Regional Growth Targets are highly ambitious for all three regions and sub-divisions. Dublin Chamber cautions that any constraints on growth in Dublin will lead to decline in national economic output and job losses across all regions.

Compact Growth: Dublin Chamber welcomes the major new policy emphasis on renewing and developing existing built-up areas rather than continual outward expansion of cities and towns. However we caution that reversing sprawl will be challenging and entail substantial deviations from trends in the Eastern and Midland Region.

Brownfield Development: Dublin Chamber believes the ambitious brownfield targets in the NPF can only be met by a dramatic step change in investment in Dublin's infrastructure. This must include the building of some keystone transport, water and energy projects as well as substantially increased capacity in education and health services.

National Infrastructure Development

Authority: Dublin Chamber proposes that a new National Infrastructure Development Authority be established to bring greater national coherence to infrastructure planning and ensure coordination across regional authorities, government departments and sectoral areas.

Governance and Implementation in the

Dublin Region: Strong strategic leadership will be critical to ensure Dublin maintains economic competitiveness in the years ahead; Dublin Chamber supports an integrated system of local government for Dublin, including a new executive with responsibility for coordinating the four Dublin local authorities and making the new Metropolitan Area Strategic Plan.

Integrating Land Use and Strategic Transport

Planning: The new Office of Planning Regulator should be mandated with ensuring better integration of land use and strategic transport plans between local authorities and national transport bodies including the NTA and TII.

Planning Reforms: Dublin Chamber proposes a number of strategic planning reforms, such as the introduction of National Density and Height Requirements, instilling greater certainty in planning decisions by limiting third party objections, and requiring local authorities to undertake Housing Needs Assessments for all tenure types and household sizes to inform residential planning decisions

Infrastructure Development: The submission summarises Dublin Chamber suggestions for infrastructure development, including our proposals for alternative financing opportunities, while outlining key infrastructure projects for transport, education, health, water and housing in the Dublin Region which will be essential to meet NPF growth targets.

An abstract graphic at the top of the page consists of various shades of blue (from dark navy to light sky blue) forming overlapping, angular, geometric shapes that create a sense of depth and movement, resembling architectural elements or a stylized landscape.

Introduction

Introduction

Dublin Chamber welcomes and commends Ireland 2040: Our Plan, the draft National Planning Framework (NPF), which provides an ambitious vision and realistic policy framework to enable sustainable population and jobs growth across all regions up to 2040. We look forward to working with all stakeholders to ensure that the vision of Ireland outlined in the NPF – with a successful Dublin at its heart – is realised.

Dublin Chamber is the voice of business in the Dublin region, representing 1,300 firms that employ 300,000 people across the Greater Dublin Area (GDA). With a membership base spanning the spectrum from small startups to major corporate multinationals, we are well positioned to reflect upon the needs of both businesses and their employees in the decades ahead.

Ireland 2040 is a plan for the whole of Ireland to grow and to prosper. The core strategy is underpinned by principles of fairness, equality and impartiality while providing an achievable vision for how to drive growth in all regions across both urban and rural areas. Dublin Chamber encourages Government and all political representatives to rise above narrow parochial and sectoral considerations and to get behind the NPF as a national strategic vision for spatial and economic growth.

National strategic planning is necessary to address growing and changing demographic pressures on physical and social infrastructure. The NPF must occupy a central place in our governance providing a strategic framework

for the provision of the full spectrum of public goods and services, from transport, economic and social infrastructure to the softer infrastructure including entertainment, leisure, cultural spaces and good urban design that makes places liveable and attractive. In particular, the NPF must ensure joined-up thinking about where housing is built and how the transport network is developed.

Dublin Chamber strongly supports the case the NPF makes for ‘compact urbanisation’, which will entail a major shift towards higher population and jobs density. The extent to which we can achieve the compact growth objectives contained in the NPF will determine the liveability and functionality of our urban areas, the productivity of our economy as well as the effectiveness of public service provision. To make less sprawling and denser urban environments – both for Dublin and other towns and cities – new approaches to urban planning will be required. In particular, an ambitious vision for the Capital city region will have to be at the core of a successful national plan.

Beyond this, Dublin Chamber supports measures contained in the NPF to achieve a greater regional spread of economic opportunity in Ireland. Dublin Chamber supports the vision for Ireland in 2040 as a nation that has managed its urbanisation process wisely, planned ahead and invested in world-class infrastructure, while preserving its traditional sense of community. While ambitious, the spatial growth in the cities of Cork, Limerick, Waterford and Galway should

learn from historical mistakes made in Dublin and aim to develop on a carefully planned and high-density basis. Enjoying good connectivity with Dublin and with each other, we support the NPF strategy of building a valuable corridor of economic activity on the West coast, which can offer an alternative option for urban living and act as centres of employment for the regional economy.

This submission begins with a commentary and analysis on the three key National Policy Objectives that target a pattern of regional spatial development, namely those pertaining to:

- The balance of growth between the three regions,
- Building accessible centres of scale and reducing sprawl and,
- Achieving compact growth around our cities, towns and villages.

While we welcome the three high level objectives and targets that structure the NPF, the submission considers some of the challenges that will need to be overcome in order to meet these growth targets, especially for the Eastern and Midland Region.

The second part of the submission explicitly addresses the challenges involved with the measurement, monitoring and governance of the NPF, with a particular focus on Dublin and the Eastern and Midland Region. The submission argues that governance structures within the Dublin Region¹ as they are currently constituted are not adequate to implement the highly ambitious growth objectives and spatial distribution envisioned by the NPF. New institutions and governance mechanisms are required to better coordinate planning at a national and regional level, across local authorities as well as the key sectoral areas of land use, housing and transport.

The final section also outlines some strategic planning reforms and key infrastructure developments – across transport, housing, education, health and water - that will be required to meet the ambitious targets laid out in the NPF.

¹Dublin Region is the county of Dublin (including the four Dublin Local Authority Areas) as distinct from the Greater Dublin Area, which also includes Kildare, Meath and Wicklow. The Eastern and Midland Region encompasses the GDA and the counties of Louth, Laois, Longford, Offaly and Westmeath.



Growing our Regions: Regional Growth Targets in the NFP

Growing our Regions: Regional Growth Targets in the NFP

The first high level objective of the NPF is to target a projected level of population and jobs growth in the Eastern and Midland Regional Assembly area that would be at least matched by that of the Northern and Western and the Southern Regional Assembly areas combined.

As the draft planning framework notes, achieving this balance over the next 23 years will require a significant deviation from recent historical trends in regional growth.

1.1 Regional Growth Parity

The objective of achieving parity in regional growth is a departure from the National Spatial Strategy (NSS) goal of 'balanced regional development'. While a diffuse concept, in practice the latter concept encompassed the ambition to achieve growth in all regions while attempting to reduce the share of national aggregate output (growth) concentrated in high growth regions, such as the Greater Dublin Area (GDA).

By contrast the ambition of the NPF is to achieve 'regional parity' of growth. The reasons for this are well explicated in the plan, namely that the growth trajectory of the Eastern and Midland Region – combined with the absence of a mechanism to re-direct the majority of growth to the other two regions – means that the NSS objective of regional balance is neither realistic nor practicable².

Indeed, to achieve a convergence in terms of growth between regions would require some constraint on the growth and development of the GDA. Given its pivotal importance and

scale to the aggregate output of the national economy – producing over 53% of GDP – such a constraint would almost certainly entail a significant decline in national output as well as long-run productivity and attractiveness to inward investment.

In an increasingly urban world, Dublin is Ireland's representative on the global stage. As the only city of sufficient scale to compete with the world's great cities, it will remain Ireland's most attractive location for foreign direct investment and skilled workers from overseas. As the engine of Ireland's economy, it is naturally the greatest centre of job creation with some 874,400 people living in the Greater Dublin Region employed in 2017, 42% of total employment³. Dublin also accounts for 62% of Irish tax revenues.

However the importance of the Dublin Region itself is under-estimated by standard measures of employment using the CSO Quarterly National Household Survey.

² NPF, P.40

³ CSO, QNHS Q2 2017

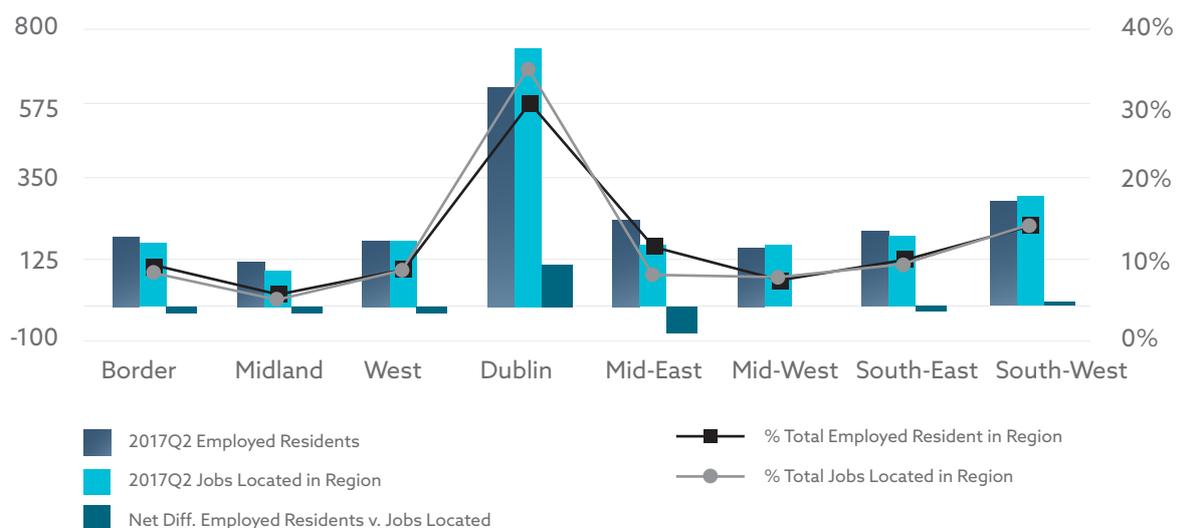
While 627,000 people living in the Dublin Region are employed, there are over 740,000 jobs located in the region, which accounts for almost 35% of all employment nationally. Moreover, 47% of all jobs nationally are located in the Greater Dublin Area.

Figure 1 compares the region where people employed are resident compared to where jobs are located. The large difference demonstrates the importance of the Dublin Region and GDA as centres of employment and business location. More than anything, this shows the centrality of the region to the national economy.

This is why demands from actors in some regions for the NPF to put an active constraint on spatial and economic activity in Dublin are so dangerous for the national economy. There should be no doubt, as the graph below shows, that any constraint on the Dublin Region or the GDA would reduce national employment and put jobs in other regions at risk.

This is why demands from actors in some regions for the NPF to put an active constraint on spatial and economic activity in Dublin are so dangerous for the national economy.

Figure 1: People Employed in Dublin from Other Regions



Notes: (1) Source: CSO QNHS, own calculations; (2) 'Employed Residents' is the number of employed people living in a region; (3) 'Jobs Located in Region' person whose employment is located in a region from QNHS survey including proportional distribution of 5% of respondents who did not specify job location in survey; (4) 'Net Difference' is number persons employed who are resident compared to number of jobs located in a region, which gives an indication of inward and outward commuting patterns in each region.

1.2 Trends in Regional Growth

We welcome the recognition in the NPF that – from a national economic perspective – no constraint can be put on Dublin to achieve convergence in growth among the regions. However, there should be no confusion about the implications of this for regional development.

Regional Growth Targets contained in the NPF are highly ambitious for both the Southern Region and the Northern and Western Region and their sub-divisions in terms of population, jobs and wider economic growth.

This is especially true for the population growth targets for the main Cities and their Suburbs in each region. Population growth objectives for Cork, Limerick, Waterford and Galway are extraordinarily ambitious, in each case targeting over 50% population growth compared to 23% in Dublin.

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Figure 2: Population Targets for Each City and Suburb

	Dublin City and Suburbs	Cork City and Suburbs	Limerick City and Suburbs	Waterford City and Suburbs	Galway City and Suburbs
Current Population	1,173,179	208,669	94,192	53,504	79,934
Targeted Population Growth	265,000	115,000	50,000	30,000	45,000
% Population Growth	23%	55%	53%	56%	56%

Source: CSO, Small Area Population Statistics.

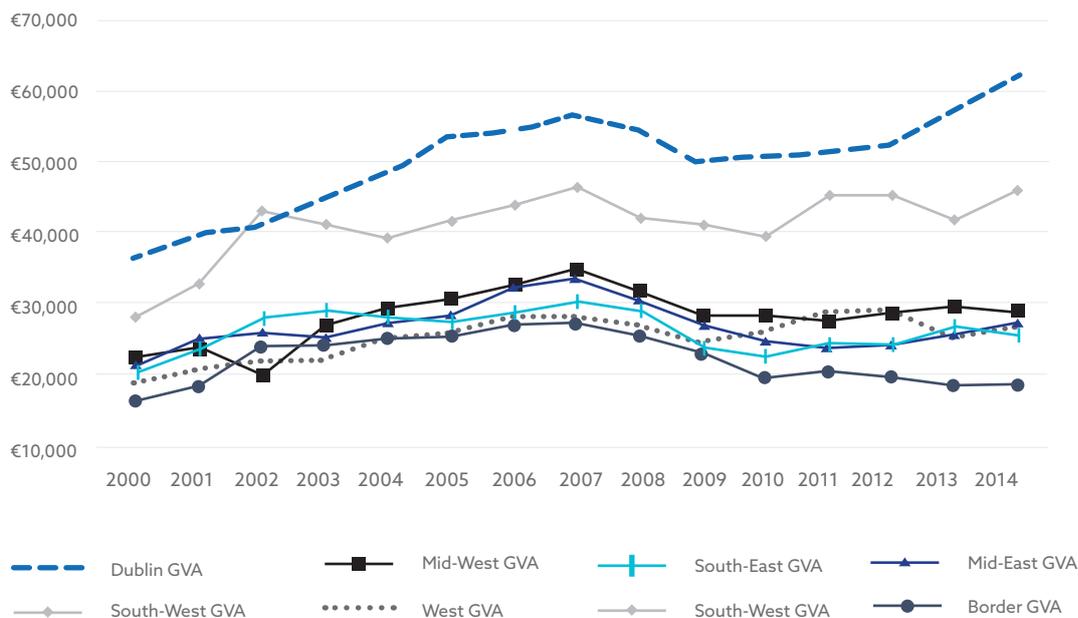
In terms of economic growth targets for each region, the NPF is also highly ambitious for the regions outside of Dublin.

Figure 1 charts Gross Value Add per capita across the NUTS 3 regions (former regional authority areas), giving an indication of entrenched regional growth trends over the past 15 years. It is possible to identify some widening divergence in economic output across the regions since 2000, although this

is relatively marginal and recent in origin⁴. In recent years Dublin and the South West appear to be on distinct growth trajectories from other regions.

Therefore, given the trend of divergence between the high growth regions and the West, Border and South-East in particular, it should be recognised that the NPF objective of achieving parity in regional growth is highly ambitious.

Figure 3: Gross Value Added Per Capita (basic prices) by Region 2000-2014



Employment growth targets for all three regions are also highly ambitious, particularly for the lagging regions. For the four regional cities and their suburbs – including Cork,

Limerick, Waterford and Galway – the employment targets are enormously ambitious, envisaging much higher growth than in Dublin City and Suburbs.

⁴Morgenroth, E. Two-Speed Recovery? Spatial Development in Ireland, 2014 (April), ESRI Research Note

Figure 4: Targeted Employment Growth by Region

Region	Current Employment (000s)	Additional Jobs Targets 2040 (000s)	% Growth
EMRA	1,000	330	33%
SRA	660	220	33%
NWRA	335	110	33%

While a national spatial planning strategy that targets convergence of the lagging regions might sound desirable, there is a real risk that it would be an ineffective promoter of national growth and endanger our wider economic fortunes.

Moreover, such a plan would do little to direct growth more effectively within regions where it is concentrated. The role of the

NPF must also be to help encourage further investment in the island from both a Foreign Direct Investment perspective and facilitating the growth and development of indigenous businesses. Linking population growth and infrastructure investment combined with a renewed focus on quality of life will play a critical role in attracting and retaining businesses.

Source Figure 3: CSO, own calculations.

1.3 Urban and Rural Complementarity

The key drivers of regional economic growth identified in the economic research literature are innovation, human capital⁵, trade, infrastructure, availability of finance and social capital. Increasingly economic growth in highly developed countries like Ireland depends on development of services and high tech industry, which in turn display a strong tendency to locate in large urban centres providing access to skills support services and appropriate infrastructure.

Therefore, the economic potential of all regions will depend on the ability of their main urban centres to stimulate or attract investment in such activities. This will mean the focal growth centre in each region acting as a gateway through which the region's interactions (including its flows of goods, people, money information etc.) with the other regions and directly with the outside world, are channelled. By strengthening the links between growth centres in each region and their hinterlands, the aim is to create a set of coherent and sustaining regions with more self-reliant integrated economies where people can find high skill employment and live.

This vision of so-called 'Balanced Polycentric' regional development involves cities or towns in less developed regions pursuing a more self-reliant development path, rather than as primarily being residential hubs for larger employment centres, such as Dublin.

In terms of industrial development policies, where the NSS focus was on encouraging

economic specialisation in regions and around particular gateways, there is much economic research which suggests that this is in fact a misguided focus for regional development policies, as the benefits of specialisation are limited⁶. By contrast, economic resilience within regions is fostered by having a diversity of industrial and commercial activities in a particular area, rather than striving for specialisation⁷.

The growing importance of the services sector will continue in the years ahead. This form of employment will remain overwhelmingly urban in focus as it tends to cluster in proximity to large markets and nodes of transport and communications.

However in rural Ireland technological advances can continue to allow more diverse economic activity. Investing in adequate broadband will be critical to keeping rural communities alive and prospering. While the traditional focus of policies aimed at regional economic convergence has been the provision of 'hard' infrastructure, as well as assistance to firms in more peripheral areas, on their own these policies are unlikely to increase the competitiveness of lagging areas. To develop high skill employment in regional growth centres, the focus has to be on supporting education, research and on human capital development. The role of Institutes of Technology – and potentially of Technological Universities – in having an enhanced role in this regard should not be underestimated.

⁵For review see: Ascani, A., Crescenzi, R. & Iammarino, S., Regional Economic Development: A Review, 2012 (March), European Commission Paper
⁶See Breathnach, P., Van Egeraat, C. and Curran, D. 'Regional Economic Resilience in Ireland: The Roles of Industrial Structure and Foreign Inward Investment', Regional Studies, 2015, 2 (1); Morgenroth, E. 'Economics: the Missing Link in the National Spatial Strategy', Administration, 2012, 60 (3)
⁷E.g. see European Commission, Strengthening Innovation in Europe's Regions: Strategies for resilient, inclusive and sustainable growth, 2017.

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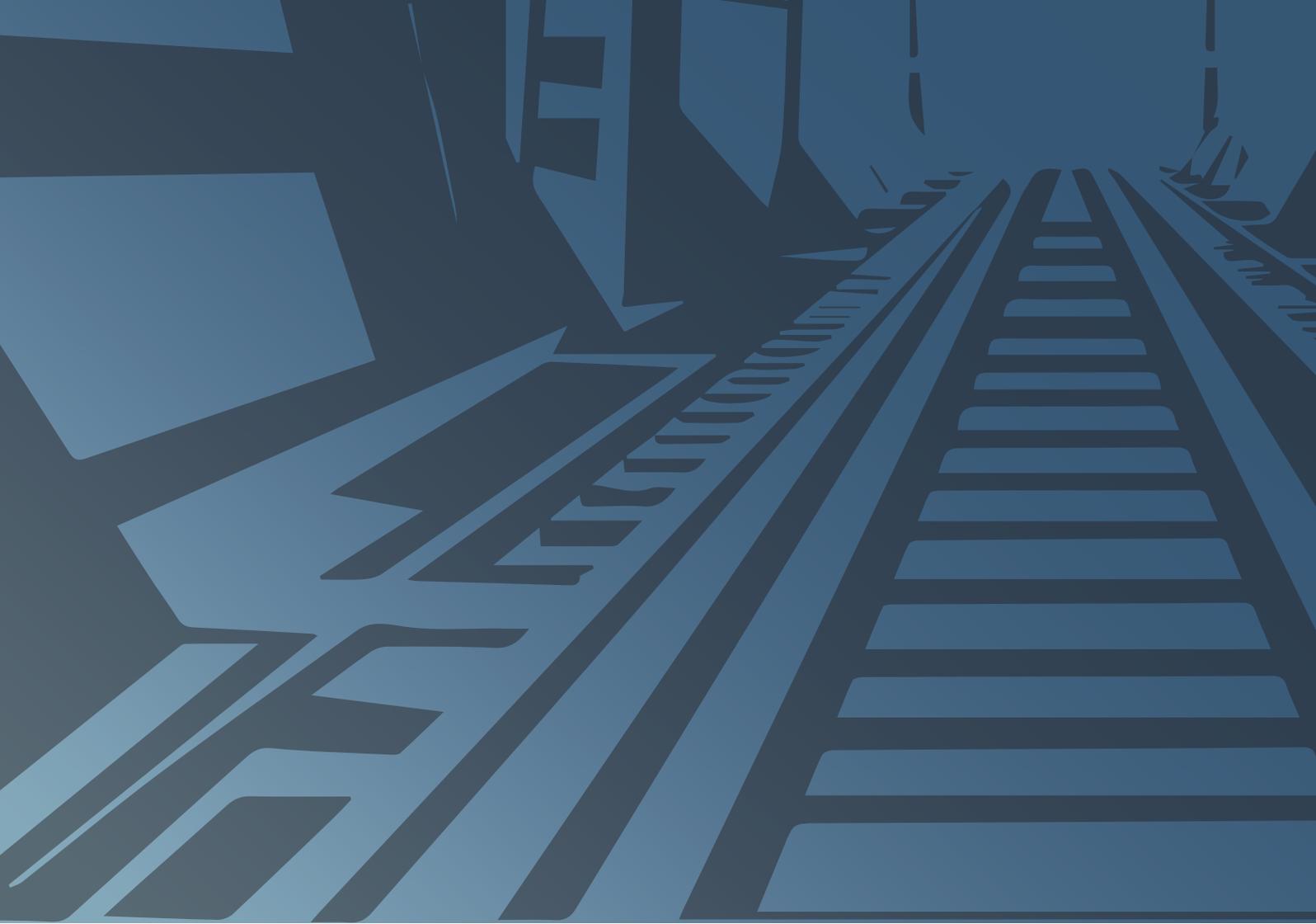
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⁸ For Ireland see McCoy et al., The Impact of Local Infrastructure on New Business Establishments, 2016, ERSI working paper series.



Building Accessible Centres of Scale: Counteracting Sprawl

Building Accessible Centres of Scale: Counteracting Sprawl

As the NPF makes clear, the physical dispersal and sprawl of development that has taken place in Ireland over the last 25 years cannot continue for the next twenty five.

The second high level objective of the NPF is that 50% population and employment growth should take place in the five cities of Dublin, Cork, Waterford, Limerick and Galway and their immediate suburbs with other towns, villages and rural places making up 50% of rest.

This vision of Compact Growth based around accessible urban centres of scale, rather than suburban and rural dispersion, is commendable. One of the core objectives of the NPF will have to be putting in place limits on sprawl and on the dispersion of settlement patterns around existing large urban centres.

2.1 Higher Density Settlement

To reduce sprawl, the National Housing Strategies that will underpin the NPF must adopt a renewed focus on brown field development.

The National Spatial Strategy also reflected the fact that people require housing and so the supply and demand of housing is a key factor in determining settlement patterns. However the strong link between housing costs, incomes and household formation was not adequately recognised in the NPF's predecessor. The degree to which this happens depends crucially on zoning, the incentives to develop brown field sites and other development incentives.

The NPF also contains the ambition to encourage the more central location of employment and commerce. While specific details on how the locational decisions of firms are to be affected will be left to the Regional Spatial and Economic Strategies next year as well as the new Metropolitan Area Strategic Plans (which will be established by the NPF), it must be recognised that currently the disjointed approach across government bodies encourages the hollowing out of city and town centres. For example, commercial rates including the system for valuation, has a role in influencing the location of businesses.

2.3 Altering Trends in Urban Sprawl

Reducing sprawl to the extent envisioned in the NPF will be challenging, entailing very substantial deviations from trends. This is particularly true of the East and Midland Region – especially the GDA – where the great majority of growth in population from 1996 to 2016 has occurred outside of Dublin City and Suburbs (23%) in Fingal (77%) and the Mid-East Region (61%).

Figure 3 provides an indication of the scale of divergence from historical trends in population growth that will have to take place for the NPF targets for compact urban growth to be realised. Fifty percent of all regional population growth (up to 265,000 people) in the East and Midland region is targeted in Dublin City and Suburbs. While this will entail (a modest) 23% growth on current population in Dublin, it will require that a far greater proportion of growth (50%) is concentrated in the City and Suburbs than has been the case historically since 1996 (36%).

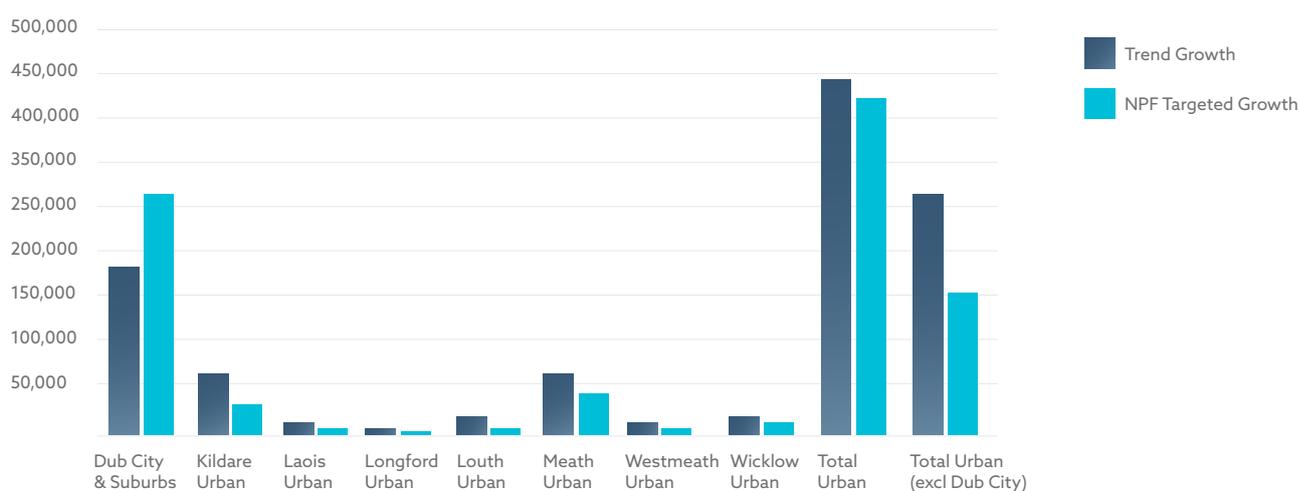
To achieve this significant deviation in entrenched growth trends in the Region will

require recognition and acceptance of the far greater scale of investment that is required in the Dublin Region, and especially in Dublin City and Suburbs, particularly in relation to transport and housing.

Significantly altering established trends towards sprawling development in the GDA will require recognition in planning and investment frameworks – as well as political acceptance – that infrastructure needs in Dublin are of an order of magnitude far greater than anywhere else in the country, especially in relation to transport and housing.

It is essential that population increases are targeted into sustainable communities on the basis of plan-led as opposed to development-led construction. Balancing the need to focus growth in cities and other urban centres to achieve critical mass while ensuring fresh life is breathed into rural Ireland is a major challenge that Ireland 2040 does a good job of confronting. Whether or not this is achieved will be one of the single most important tests of the success of the NPF.

Figure 6: Trends in Population Growth Compared to NPF Targeted Growth East Midland Region



Notes: (1) Source: CSO, own calculations; (2) Trend Growth is estimated based on the historical growth share of each area from 1996-2016 applied to the estimated 500,000 new residents in the East & Midland Region over the period 2017-2040; (3) NPF Targeted Growth is the aspirational growth targeted in the planning framework, estimated to be 'at least' 50% in Dublin City and Suburbs, 30% in large urban towns (>10,000) in GDA and 20% in smaller towns (< 10,000) and rural areas; (3) Dublin City and Suburbs is taken to mean the existing CSO definition.



Achieving Compact Smart Growth Brownfield Development Targets

Achieving Compact Smart Growth: Brownfield Development Targets

Dublin Chamber welcomes the third strategic objective of the NPF that a significant proportion of future urban development will take place on infill/brownfield development sites within the built envelope of existing urban areas. This 'Compact Smart Growth' objective is given tangible form in the 50% target for new housing in the five cities to be

developed on infill/brownfield sites while 30% is targeted in towns and villages.

The view of the Chamber is that meeting these Compact Growth targets is achievable and will be absolutely essential for liveability, sustainability and economic output.

3.1 Benefits of Brownfield Regeneration

The NPF represents the beginning a major new policy emphasis on renewing and developing existing built-up areas rather than continual expansion and sprawl of cities and towns out into the countryside, with a target of at least 40% of new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites. Dublin Chamber is a strong advocate for the environmental, social, and economic benefits of high urban density. Access to the services necessary for a prosperous and inclusive modern lifestyle now requires economies of scale that are only granted by dense urban living. Ireland's population is both growing and ageing, presenting challenges to public infrastructure and service delivery as Government works to improve quality of life and international environmental objectives. Well-planned urbanisation based on high density offers the only answer to the looming threats of chronic transport congestion

and the increasingly difficult environmental questions that will be asked of Ireland in the coming years.

High-density planning also presents opportunities to design urban landscapes that strengthen social cohesion. Large-scale residential-only developments tend to encourage driving rather than walking, and risk becoming 'dormitory villages' with little community interaction. Once people make the decision to drive, longer journeys are less of a marginal increase and people are more likely to drive to major urban centres in their car, reinforcing this effect. By contrast, building mixed-use areas reduces the need for transportation and makes inhabitants more likely to invest time and money in their local environment, increasing buy-in to the local community.

3.2 Meeting Brownfield Targets

The view of Dublin Chamber is that the ambitious brownfield/infill development targets in the NPF cannot be met – and more importantly our national economy will suffer – without a dramatic step change in investment in Dublin’s infrastructure, including the building of some keystone infrastructure projects such as Dart Underground and Metro North. Implementation of these Compact Growth targets also will also require much more effective coordination between planning, infrastructure delivery, and housing development in the Dublin Region and Greater Dublin Area. For many years, the Chamber has highlighted the problem of disjointed local government in Dublin and the absence of a coherent vision including coordination of land-use, planning, transport and infrastructure investment with residential and commercial development for the Irish capital as a whole. In conjunction with expected changes in household composition (person-household size), this increase in population will have a very substantial impact on the Capital’s housing requirements, especially those of

the City and Suburbs. At present, housing is too expensive to buy and rent in Dublin to accommodate the estimated 143,000 additional households that are targeted in the NPF for the City and Suburbs¹¹. This will need to change if we are to accommodate the number of households targeted for the City and Suburbs in the NPF.

Figure 2 also shows the implications for housing output in each of the five cities and suburbs. The ambitious growth targeted in each of Southern Region and the Northern and Western Region will require expanding the housing stock by over 65% the City and Suburbs of each of the four regional centres of Cork, Limerick, Waterford and Galway. By contrast, the housing stock in Dublin city and suburbs will need to expand by a more modest 30% to house the population growth targets. Needless to say, these targets will require very substantial ramping up of output in residential construction activity, especially given the low output in most regional cities over the past number of years and even by historical standards.

Figure 7: Estimates for Housing Units Required by 2040

	Dublin City and Suburbs	Cork City and Suburbs	Limerick City and Suburbs	Waterford City and Suburbs	Galway City and Suburbs
Housing Stock (2016)	468,372	86,213	40,085	24,522	34,297
Housing Units Require by 2040	143,243	62,162	27,027	16,216	24,324
% Growth	31%	72%	67%	66%	71%

¹¹NPF, p.88

Notes: (1) Source: NPF, p.88 and CSO Small Area Population Statistics; (2) For projections of number of households to population growth, household size in all Cities and Suburbs is assumed to be 1.85 persons per household, in line with NPF estimates

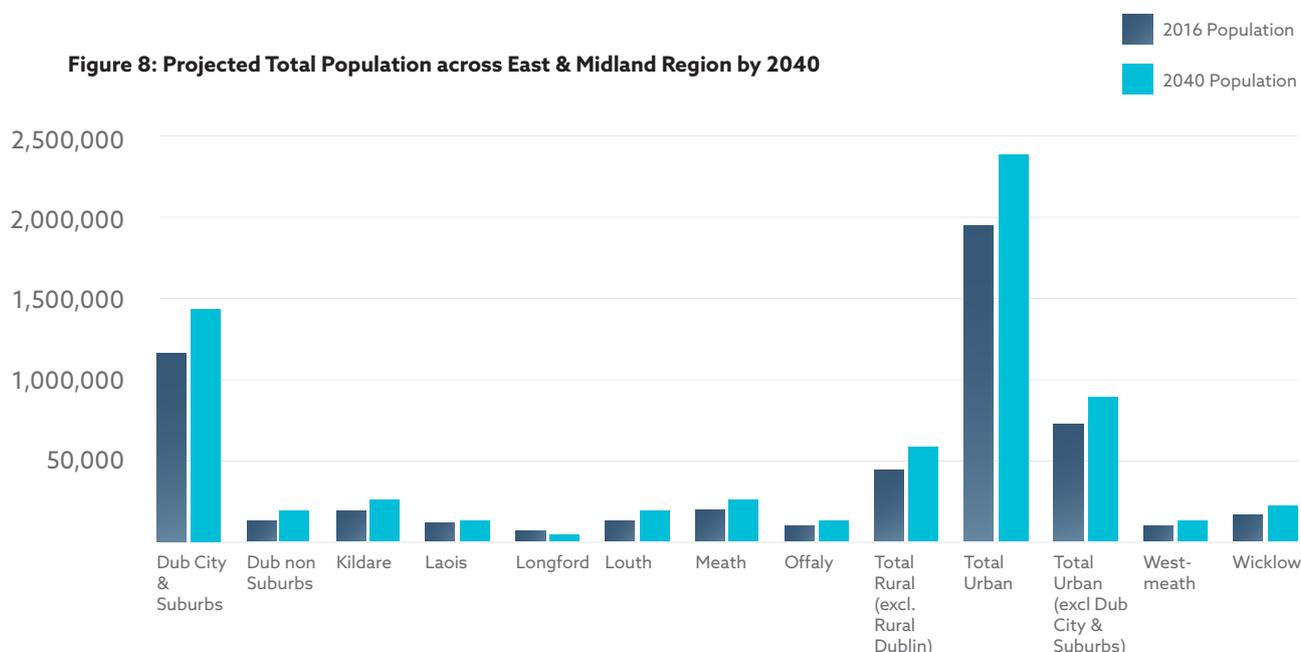
3.3 Implications for Housing Supply in Dublin

Based on the estimated average annual housing need of 7,000 new units per annum in Dublin Region and 6,600 in Dublin City and Suburbs, this would mean approximately 169,000 new housing units will be required in Dublin Region and 159,000 in City and Suburbs by 2040. However the Housing Agency models of housing requirements in Dublin do not account for pent-up demand (a result of housing output under-supply) which, if taken from 2014 means a minimum of approximately 8,000 new units will be required per annum in the Dublin City and Suburbs alone. This is a tall order, given that in 2016 just 4,200 new units were added across the entire Dublin Region. All this will necessitate greater population density in urban areas, particularly in Dublin City and suburbs where 25% of overall national population and jobs growth to 2040 is targeted. In our previous submission on the

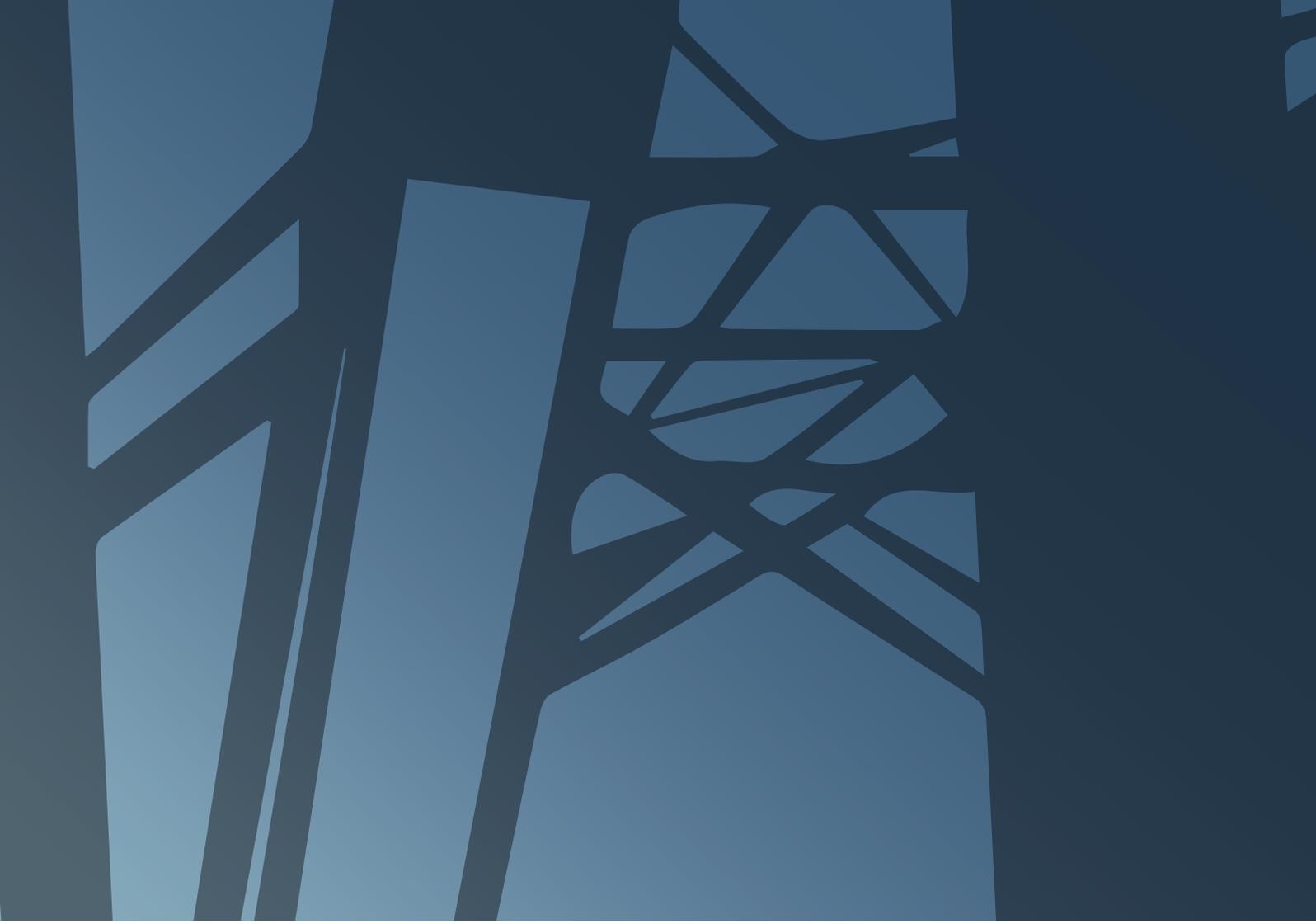
National Planning Framework, Dublin Chamber explained why urban consolidation based on higher population density is unlikely to be achieved on the basis of current planning models, and why a new form of regional coordination will be required. Regional coordination of this kind will require either reform of local government, or the direct intervention of national government.

While the details on regional economic growth strategies will be left to the Regional Plans next year, the compact jobs growth targets will entail significant implications for planning the location of new enterprises. In particular, previous patterns of location of new industrial, commercial and services sectors on the outskirts of cities, such as Dublin and Cork, especially along key arterial routes and motorways are not likely to be compatible with the new compact growth objectives.

Figure 8: Projected Total Population across East & Midland Region by 2040



Notes: (1) Source: CSO, own author calculations; (2) Graph shows existing population compared to estimated population by 2040; (3) 2040 population distribution of 500,000 additional population in East & Midland Region based on 50 % Dublin City and Suburbs, 30 % large towns in GDA and 20 % in smaller towns and rural areas.



Challenges to Implementing the National Planning Framework

Challenges to Implementing the National Planning Framework

The remaining contribution of the submission will focus on the central challenges to implementing the three high level targets set out in NPF on (1) regional growth parity, (2) regional population and jobs growth and (3) urban brownfield regeneration.

It is vital to the future success of the planning framework that the lessons of the National Spatial Strategy are fully learnt and are implemented. Developing a comprehensive,

holistic and integrated approach will be the key consideration of a NPF that delivers sustainable communities, vibrant economies and attractive quality of life across Ireland. Key to the success of the NPF is an effective monitoring, governance and implementation process. National, regional, metropolitan and local authority governance structures must be strong enough to ensure implementation of the three NPF targets.

4.1 National Infrastructure Development Authority

Dublin Chamber proposes that a new National Infrastructure Development Authority will be required to bring coherence to the planning framework by ensuring coordination across regional authorities, government departments and sectoral areas. This new body should be responsible for driving a cross-government approach rather than a fragmented department-by-department policy approach.

The new authority should ensure that Capital Plans adhere to the vision set out by the NPF to ensure investment is matched up with the designated areas and focus of growth. It should be tasked with ensuring the alignment of internal departmental plans with the broader objectives laid out by the NPF.

While the new Office of Planning Regulator will be integral to ensuring that Regional and Local Development Plans adhere to the NPF, the proposed authority would be tasked with ensuring regular monitoring of infrastructure planning and provision across all bodies, including Government Departments. Its role would be to coordinate the activities of the Department, local governments, the National Transport Authority, Transport Infrastructure Ireland, Irish Water and other relevant state bodies such as the National Asset Management Agency and the National Treasury Management Agency, to ensure implementation on the ground. In this way, the function of the new authority should be more active monitoring, advice and measurement to ensure delivery, rather than the reactive role of the Planning Regulator.

4.2 Governance and Implementation in the Dublin Region

The Greater Dublin Area operates as one city region, and is an increasingly integrated economic area. However, the way that it is governed does not reflect this reality. The Dublin Region alone is divided into four local authorities, with four indirectly elected mayors who have little power and change every 12 months. This is antithetical to joined-up thinking, fostering unsupportive competition rather than cooperation. It undermines efficiency in the everyday workings of the city region, while making it difficult to form long-term plans for Dublin as a whole.

Dublin Chamber welcomes the proposal in the NPF to introduce new Metropolitan Area Strategic Plans (MASPs). However, we caution that without a strong executive voice for the Dublin, to coordinate the making and implementation of the MASP for the region, these strategic plans will not be effective and will simply replicate the uncoordinated structures that currently bedevil planning in the metropolitan region.

Dublin Chamber wishes to stress in the strongest terms the importance of joined-up thinking between planning, infrastructure delivery, and housing development in the Greater Dublin Area. Strong strategic leadership will be crucial to ensuring that Dublin maintains economic competitiveness in the years to come. Dublin Chamber supports an integrated system of local government for Dublin as a whole.

For many years, the Chamber has highlighted the problem of disjointed local government in Dublin and the absence of a coherent vision for the Irish capital as a whole¹². The existence of a clear and enforceable plan for housing and infrastructure in the GDA over the next 23 years would ensure domestic and international confidence in Ireland's offering. It would also have a calming effect on the current housing market by creating certainty about future supply and impeding speculative development.

Under the NPF, the four urban local authorities in the Dublin Region must be obliged to accommodate a greater proportion of the population growth than is projected for the wider Eastern and Midland Region. Coordination between local authorities in this matter will require the active intervention of national government and most especially the capital investment necessary to achieve these goals.

To achieve the densification of growth in the Dublin Region, a new executive structure may be required to coordinate local authority implementation. This could come directly from central level – in the form of a Minister for the Dublin Region, for instance – or in the form of a directly or indirectly elected new chief executive for the Dublin Region. It would be necessary to decide on a range of substantive statutory functions that might be assigned to a new chief executive that stands over the

¹² E.g. Dublin Chamber, Democracy Now! Submission to the Dept. of Environment, Heritage & Local Government – Green Paper for Local Government Reform, 1 November 2007; Response to the Local Government (Dublin Mayor and Regional Authority) Bill 2010, June 2010; Commentary on the Local Government (Dublin Mayor and Regional Authority) Bill 2010, November 2010; Submission: Directly Elected Mayor for Dublin, 19 November 2013; Submission to Dept. of Environment, Community and Local Government on Statement of Strategy 2015-17, 3 November 2014

four Dublin Local Authorities, including what functions the executive would have, what budgetary powers he or she would have and how will these functions impact on other public bodies at central and local government. All aspects of the governance of the Dublin metropolitan area will need to be taken into account including questions around an overall regional authority, the relationship with the wider Eastern and Midland Regional Assembly, impacts on the existing Dublin authorities and the local area governance in the villages around the city and counties of Dublin.

It may well be right to make significant changes in governance for the benefit of the Dublin area, but policy-makers need to be very clear on what it is we are changing and the reasons for changing governance structures.

There is no point in creating an office with a weak or duplicated mandate that would make the ultimate goal of delivering better services for the citizen harder, not easier, to achieve.

For example, Dublin Chamber is opposed to the idea of creating a directly elected mayor for each of Dublin's four local authorities. This would be 'worst of both worlds' in terms of creating an expensive, duplicative executive layer which does not solve the problem of regional coordination that exists among the four Dublin Local Authorities.

In addition, any proposal for a new executive must have full regard to cost implications and staffing issues. Businesses in Dublin already shoulder 50% of the cost of Local Authority revenues through commercial rates. Resources would be needed to support the performance of the statutory functions assigned to the executive and to support the operation of the office.

Dublin Chamber is opposed to the idea of creating a directly elected mayor for each of Dublin's four local authorities. This would be 'worst of both worlds' in terms of creating an expensive, duplicative executive layer which does not solve the problem of regional coordination that exists among the four Dublin Local Authorities.

4.3 Strategic Planning Reforms

Dublin Chamber believes that a number of planning reforms are required to facilitate commercial, residential and infrastructure development in Ireland. In particular, greater certainty must be introduced into the planning process. As a country, we are at risk of becoming uncompetitive with other jurisdictions if we cannot improve the efficiency of our planning process by making it speedier and less legalistic. Reforms are required to the rights of third parties¹³ to appeal against a planning decision by a planning authority. There is a strong case that these rights are disproportionate and unbalanced with the wider public interest. Such rights to object to a planning decision (as opposed to a planning application) are almost unique to the Irish planning system and one reason for the slowness, waste and inefficiency of our planning process compared to other States¹⁴.

Any third party who made submissions or observations in writing to the planning authority in relation to the planning application may appeal the subsequent planning decision made by a planning authority. In addition, some parties such as prescribed bodies, environmental bodies and/or those with an interest in the land (e.g. a landowner/occupier adjoining the application site) may appeal the planning decision to An Bord Pleanála without having made a prior submission during the planning application. This unique feature of the Irish Planning process came to prominence recently in the case of the Apple centre planned in Galway¹⁵.

By contrast, there is no third party right of appeal against planning decisions in most jurisdictions including in England, Wales, Scotland or Northern Ireland. Third Parties only have a right to object to a planning application however there is no right of administrative appeal to a decision open to third parties, as there is in Ireland. While the idea of giving third parties a right of objection to planning decisions has been examined by authorities in each jurisdiction, in each case it was found to have been inefficient as well as undemocratic¹⁶ by advisory groups. In 2001, the Government in the UK rejected a third party right of appeal in a Planning Green Paper, arguing that such rights would make the system more legalistic and much slower¹⁷.

In addition, while some other jurisdictions such as the Isle of Man or New Zealand¹⁸ do allow some third party objections to planning decisions, they have much stronger mechanisms to prevent frivolous, spurious or vexatious appeals. In Isle of Man, for instance, it is generally only persons with an interest in an adjoining site that can appeal a planning decision and this must be done on clearly specified grounds¹⁹, few such mechanisms or restrictions exist in Ireland. Third Party appeals against planning decisions are already not allowed in the Strategic Infrastructure and Strategic Housing Developments planning processes operated by An Bord Pleanála. Reasonable restrictions or limitations on such appeals should be put in place for normal planning decisions made by planning authorities.

¹³ Third parties' in this context means people who have views about a planning application, whether or not they are directly affected by it

¹⁴ In each of the past four years, between 50% and 60% of appeals received by An Bord Pleanála were third party appeals to planning decisions. See An Bord Pleanála Annual Reports 2012 to 2015.

¹⁵ See Paul, M. Irish Times, Groundhog Day in Athenry as Apple's €850m data centre stalls, 2017 (15 Sept)

¹⁶ For UK See: Commons Library Briefing Paper on Third Party Rights of Appeal in Planning, May 2002, available here: goo.gl/1UhhzT; for Wales see: Towards a Welsh Planning Act: Ensuring the Planning System Delivers, June 2012, available here: goo.gl/wN2Lfp

¹⁷ E.g. *ibid*: "None of these approaches adds up, in our view, to a case for a third party right of appeal. It could add to the costs and uncertainties of planning", p.29.

¹⁸ Although in New Zealand this is more akin to Judicial Review in Ireland, which is a challenge to the legal validity of a decision rather than the content of the decision itself.

¹⁹ The Town and Country Planning (Development Procedure) Order 2013 specifies those who generally won't be accepted as having sufficient interest: 'These are people concerned exclusively with – (a) the impact of the development on the value of their property; (b) commercial competition; (c) land ownership; (d) private property rights; or (e) covenants, or any combination of these.'

4.4 Integrating Land Use and Strategic Transport Planning

Public transport, rail in particular, requires critical densities within a short distance of rail lines to operate effectively. However there is often little recognition within public transport strategies that rail and bus services can also play a reciprocal purpose in land use policies, by encouraging growth in key population centres. However the history of the Irish railway network, in particular, is testament to rail services' ability to encourage critical population densities to develop along rail lines.

It is true that both the TII and NTA are bound statutorily to 'have regard' to higher level master plans, such as the NSS or NTF, however it is unclear where strategic transport plans drafted by these agencies sit in the 'hierarchy of plans' between the Regional Spatial and Economic Strategies and the Local Authority Development Plans.

This can lead to a lack of coordination between land use and strategic transport plans. Such absence of coordination can be seen, for example, in the formulation of plans for the new neighbourhood at the Poolbeg West SDZ. The original plans did not sufficiently take into account the need for high density in light of the housing crisis and the relative centrality of the SDZ location. The Chamber argued during its contributions to the SDZ planning that there was a clear disjunction between the housing and transport plans for Poolbeg West. The NTA categorically stated that the original plan for 3,000 units would leave the area considerably short of the population level required to make construction of the Luas

Red line viable. As a result of this disjuncture, there is now a danger that the Luas extension to Poolbeg will never be built, permanently undermining the success of the SDZ, due to a lack of joined-up thinking.

To improve the integration of land use planning and transport planning, Dublin Chamber proposes that the new Office of the Planning Regulator be given a role as overseer of strategic transport plans²⁰ by the NTA and TII to ensure their coherence with objectives of the NPF, Regional Economic and Spatial Strategies and the (new) Metropolitan Strategic Area Strategies. It should also be recognised that bodies such as the NTA or TII, despite having a statutory obligation to comply with the NSS and regional guidelines, may not always make decisions that are consistent with regional planning guidelines. And in addition, there should not be an assumption that it is local authority development plans that are inconsistent with regional plans or national plans.

We believe a better approach would be to give the new Office of Planning Regulator the role as arbitrator between local authorities and bodies such as the NTA or TII, where disagreement arises over draft plans. When a local authority is of the belief that specific decisions by the NTA or TII run contrary to Development Plans, such complaints should be given an airing by the OPR, not simply cast aside.

²⁰ These are defined by the Dublin Transport Authority Act 2009 and include regional and metropolitan plans like the NTA's Greater Dublin Area Transport Strategy 2016-2035

4.5 National Density Requirements

Dublin Chamber calls for national planning guidelines to mandate significantly higher density levels in all new urban developments, including an allowance for greater building heights in appropriate areas. A more prescriptive planning process will be necessary in order to ensure that other cities such as Cork, Limerick, and Galway do not repeat the mistake of low-density sprawl that has been made already throughout the Dublin region. Higher density requirements should also be applied in large towns and small villages, whilst being adapted to the distinct urban planning and architectural needs of such settlements.

Dublin Chamber calls for national planning guidelines to mandate significantly higher density levels in all new urban developments, including an allowance for greater building heights in appropriate areas.

The Chamber proposes that urban planning permissions should be directly linked to density targets. Each local authority currently announces a Core Potential Residential Yield in its Area Development Plan, indicating the total capacity for new housing units on appropriately zoned land based on average rates of urban density. As outlined above, higher population targets and density rates will now be required in urban areas. To ensure

that high density is achieved in actuality, new planning permissions for urban residential developments should be subject to the local authority making overall progress towards its target for residential capacity. Any planning permission granted which deviates significantly from the target average density must be balanced by a permission granted which deviates in the opposite manner.

There is a common misconception that increasing urban density implies the construction of overbearing skyscrapers on a large scale. However, this is not necessarily the case. The core of Copenhagen, for example, has a population density at least twice as high as that of Dublin, but with building heights only marginally higher (one or two stories). Copenhagen's successful development has been made possible through careful planning rules, cross-party political buy-in, and a strong commitment to an ambitious long-term urban plan.

Dublin Chamber recommends a pragmatic mixed approach for Dublin. The historical core of the city should be protected and its distinctive character preserved, while optimum use should be made of the remaining opportunities for new high-density development. In particular, sites at a remove from the Georgian core, such as the Poolbeg West Strategic Development Zone, offer a once-in-a-generation opportunity to compensate for the constricted capacity caused by poor planning decisions elsewhere in the city. Designs for such sites must be ambitious and allow for well-designed high-rise development that enhances Dublin's architectural landscape.

4.6 Planning Infrastructure Development

To develop Dublin and other urban regions, Government should learn from models of best practice in urban planning such as Copenhagen, where planners have followed a coherent cross-party policy of 'infrastructure first'. Proper urban development requires both long-term planning and a stable commitment to financing vital infrastructural projects. In the same way that Copenhagen's highly successful Finger Plan, first developed in the 1940s and then refined and implemented over the following seven decades, has provided the foundations for the city to become one of the world's most attractive and competitive cities in which to live and do business, the NPF has the potential to do the same for Ireland. However, unstable capital investment patterns have undermined Ireland's ability to plan its cities effectively in the past, and a shift in policy will be required if future urbanisation is to be managed consistently. Government should explore alternative financing models for major infrastructure projects, paying particular attention to the role of private finance or public-private partnerships, in order to ensure a more stable flow of capital investment in the future.

As the demographic, economic, and transport hub of Ireland, Dublin has a critical role to play in meeting the country's overall infrastructural requirements. The current traffic congestion and other pressures being experienced by the capital region cannot be blamed upon the city's economic success relative to other parts of Ireland; they are rather the result of poor long-term planning and historic underinvestment by national Government. The NPF should aim to fundamentally change this, with a view to benefiting Ireland as a whole. A successful plan for the GDA will take into account the full spectrum of infrastructure needs, from world-class transport and communications facilities to the softer infrastructure that makes a city region pleasant and liveable. Appropriate educational and healthcare facilities, entertainment, leisure, and cultural spaces will all be vital to ensuring that Dublin remains a thriving and internationally attractive capital. With regard to housing, the National Planning Framework must ensure joined-up thinking in terms of where the houses are built and how the transport network is developed.

4.7 Financing Infrastructure

Public infrastructure deficits across the Irish State are acute and the severe capital under-investment, especially in transport, water and housing, is holding back economic productivity. Ireland currently has the second lowest capital spend in Europe and will not achieve an equal footing with its competitors merely by investing at an equal rate. In order to catch up, Ireland must outspend them to close the historical gap. Dublin Chamber proposes several measures to finance the necessary increase in capital expenditure in the coming years.

Suitable infrastructure projects should be moved off the Government balance sheet using private finance, allowing the overall capital investment level to expand beyond the limits imposed by the Stability and Growth Pact (SGP). The Pact allows for flexibility in its spending restrictions for investments financed through public-private-partnerships (PPPs). However, the proposed volume of private financing for new infrastructure projects under the existing Capital Plan is very small, accounting for 2.5% of capital expenditure from 2017-2021, or €113 million per annum.

Currently the Irish government is not using the ESFI effectively to increase net spending on infrastructure outside of the parameters imposed by Fiscal Rules.

There are opportunities for investing in infrastructure in Ireland under the European Fund for Strategic Investment Fund and other streams available under the EU Investment Plan. Currently the Irish government is not using the ESFI effectively to increase net spending on infrastructure outside of the parameters imposed by Fiscal Rules.

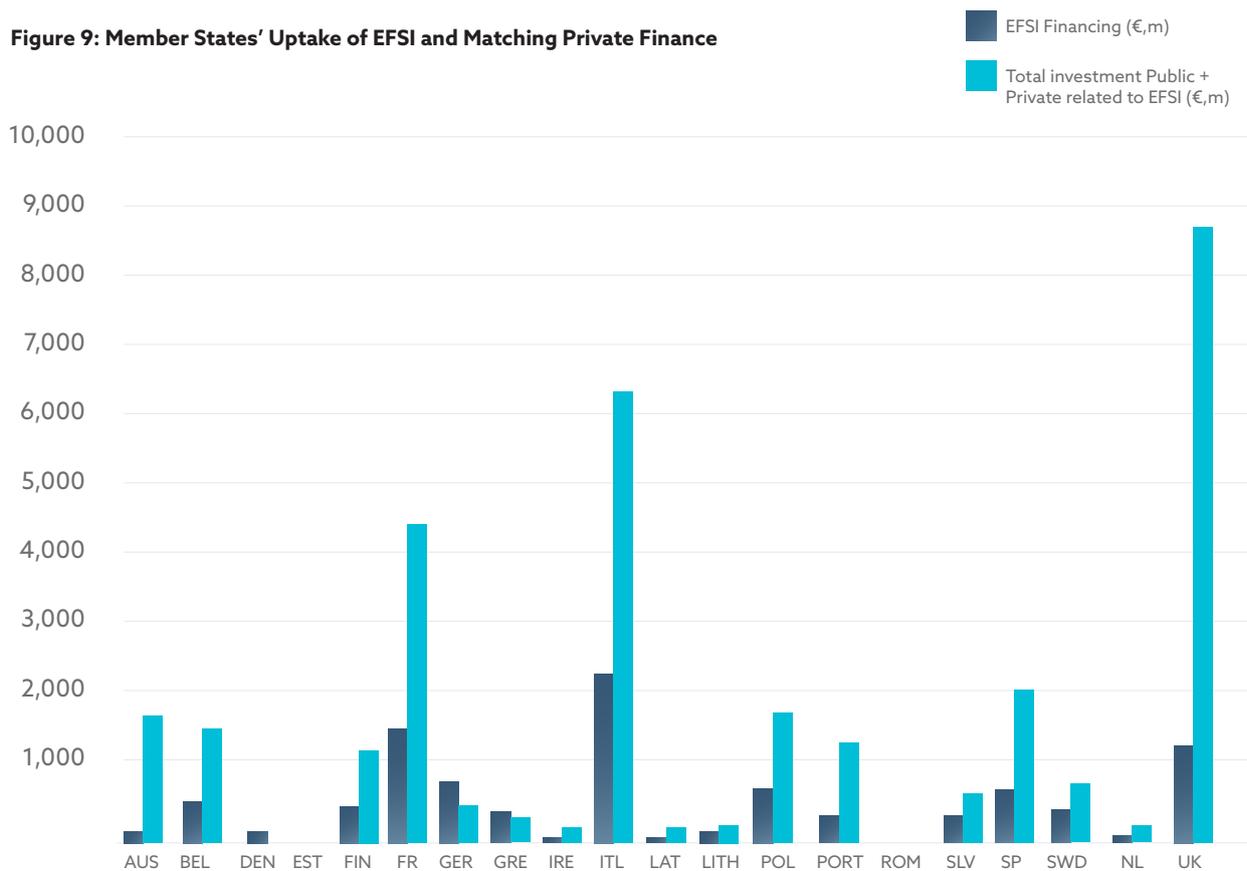
The Irish Government has ruled out making any contributions to EFSI projects on the basis that the Capital Investment programme is already funded. While this is true, our view is that the level of investment proposed in Government's Capital Plan is inadequate to meet our national infrastructure needs. While the EU Fiscal Rules are the greatest barrier to increasing State investment in infrastructure, the European Commission launched the EFSI to enable member-states' flexibility regarding the application of the fiscal rules to promote investment. Many EU states have used the EFSI to commence large-scale infrastructure projects that would not be possible using ordinary exchequer financing on its own. The only Public Infrastructure projects being built with finance under the Juncker Plan in Ireland are 14 primary health care centres under PPP. There is much greater opportunity to invest in social, transport and economic infrastructure from the EFSI. Ireland accounts for less than 1% of EFSI funding for approved projects to date.

There is appetite from investors for large PPP projects which is not being availed of despite the encouragement of the European Commission and the ECB. This is due to the Irish Department of Finance cap, which limits PPP investment to 10 percent of total annual

Exchequer capital spending. Our view is that this policy is both arbitrary and out-dated. Of the EFSI transactions approved so far, 10% are in the transport sector, including rail. Trenitalia, the national train operator in Italy, has secured a €300m bond agreement to finance the acquisition of new passenger rolling stock through the EFSI. Przewozy Regionalne in Poland has similarly secured an investment deal under the Juncker Plan to completely modernise and renew their passenger rail fleet. By contrast, in Ireland, there has not been a single transport project put forward by the government or the transport companies to seek potential funding from the EFSI.

Much greater efforts are also by the Irish Government, as well as State Bodies, to secure funding agreements from the European Investment Bank for critical infrastructure investment. Other countries in the EU, even ones with huge national debts like Italy, have been successful in securing investment funding for critical projects. The EFSI framework requires Government Departments and State Bodies to do the ground work on designing and packaging public infrastructure project proposals to attract private investors. Proposals need to demonstrate that they can be revenue generating and meet additionality criteria. Greater funding in the capital plan should be given to Departments to do such design work.

Figure 9: Member States' Uptake of EFSI and Matching Private Finance



Source: EIB EFSI Project List (21 Oct. 2017), available at: <http://www.eib.org/efsi/efsi-projects/index.htm>

4.8 Infrastructure Project Priorities

Many of the big infrastructure investments required in the GDA will have a major national impact. The National Competitiveness Council has said that enhanced city performance has positive spill-over effects on the country as a whole, and that prioritising investment and initiatives to develop the competitiveness of our cities is a most effective use of Exchequer funds²².

Transport

Ireland has tended to both underestimate its future infrastructural needs and failed to provide for them. For example, the Government's previous long-term plan for Dublin transport to 2016 underestimated the rate of population growth by 50%. It also estimated that implementation would lead to public transport having 63% of the GDA transport market by 2016. In fact, the most recent figures show that just 16.4% of workers in the GDA commute to work by public transport. Dublin has been ranked as the 7th most congested city in Europe, with public transport usage by commuters in the capital standing at just 21.5%.

Many transport projects within Dublin are of national and of European importance. Dublin Airport, for example, is of paramount importance to the country's global connectivity. With over 80% of overseas visitors arriving through the facility²³, it is effectively Ireland's national airport. Improved connectivity to Dublin Airport is a national and EU imperative for in the years ahead. Linking Dublin Airport by rail is an obligation as part of the core trans-European transport network. Similarly, the Dart Underground project which would link the Northern and Southern rail lines is identified as a project of European importance and would form part of the EU Core TEN-T Network.

National transport projects that Dublin Chamber believes needs to be prioritised over the coming years are:

- **Dart Underground and Dart Expansion** to connect all existing rail lines has been described by the NTA as the 'missing link' in the Ireland's rail infrastructure. It would unlock the capacity of the existing rail infrastructure, connecting Belfast to Cork and Sligo to Waterford and provide an enormous benefit for movement within Dublin.
- **Metro North** to connect Dublin Airport with the City and the wider national rail network, while easing urban congestion by serving the rapidly growing Fingal area.
- **Improved inter-city public transport networks**, to connect the Atlantic Corridor cities reliably with the national capital and with each other, while reinforcing the proposed shift towards urban consolidation through high-density development.
- **Improved public transportation in urban areas**, including expansion the tram network where it is sustainable. In low-density areas that are unable to sustain more advanced public transport solutions, greater provision should be made for bus services through priority and dedicated bus lanes and improved bus shelters.
- **An Outer Orbital Motorway** to ease the pressure on Dublin's road network, including the M50, and to allow people to better travel nationwide without the need to enter the confines of the capital.
- **An Eastern By-Pass** to complete the M50 ring road, cutting out the need for cross-city car journeys and reducing congestion.

²²Forfás, National Competitiveness Council, Our Cities: Drivers of National Competitiveness, April 2009, p. 7, http://www.competitiveness.ie/media/ncc090421_our_cities.pdf#page=8

²³ Dublin Airport, North Runway - Potential to connect, compete and grow, <https://www.dublinairport.com/docs/default-source/North-Runway-Docs/potential-to-connect-compete-and-grow6ad438b73386836b47fff0000600727.pdf?sfvrsn=0>

Education

The NPF will have major geographic implications for demand in primary and post-primary education. The population growth targets for Dublin, especially for inside the M50, will require significant shifts in current demographic projections for school buildings and school places. Between 2000 and 2016 the largest increases in enrolments at primary and post-primary were in Meath, Kildare and Fingal while decreases or stagnation was observed in the city of Dublin as well as the cities of Cork and Limerick²⁴. Given the constraints on school places in Dublin at present, the growth targets may require a front-loading of investments contained in the School Construction Programme and Summer Works Plan in the Dublin Region to ensure there is sufficient capacity to meet the population growth envisaged, especially over the next ten years.

Given the constraints on school places in Dublin at present, the growth targets may require a front-loading of investments contained in the School Construction Programme and Summer Works Plan in the Dublin Region

At third level, there is an urgent need for capital investment across Higher Education Institutions. This is particularly true of Institutes of Technology (IoTs). Meeting this demand within Dublin will have a huge bearing on our national competitiveness and attractiveness as a business location. The demand for access to third level education is expected to increase up to 2029 (27% increase in student numbers), which will exert further pressure on capacity.²⁵

While the Universities Act 1997 contains a provision for universities to borrow within a framework agreed with the Higher Education Authority, no such framework is in place for IoTs. This framework, which has been in operation for many years, allows borrowing by Universities that is 'off-balance sheet' and does not impact on the General Government Debt. While most IoTs do not have sufficient own-revenues to enable them to borrow independently some, including those in Dublin²⁶, may be able to do so at a future date. Given the demographic expansion expected in higher education during the course of the NPF, this borrowing framework could be vital to enabling institutions to fund essential capital development, including student accommodation, teaching and campus facilities.

Health

Increasing capacity in primary and acute health services will be central to enabling the population growth envisaged in the NPF in the Dublin Region. Latest ERSI projections suggest that huge investment in infrastructure

²⁴ Dept. Public Expenditure and Reform (DEPER), Strategic Public Infrastructure: Capacity and Demand Analysis, August 2017, p.56

²⁵ Expert Group On Future Funding for Higher Education, Investing In National Ambition: A Strategy For Funding Higher Education, March 2016, p. 19.

²⁶ About 32% of UCD income comes directly from state sources with 18% from research grants and contracts which are mostly state bodies. DIT, by contrast, receives about 64% of its income directly from state sources with 8% from research grants and contracts.

will be required to provide Ireland's health services over the period 2017 to 2035²⁷. The Capital Plan 2016-2021 includes over €3 billion for investment in health infrastructure, and the Department of Health has identified five main priority areas to begin a long term programme of transformation of health care facilities across the country. While essential, these very large projects – including the National Children's Hospital, oncology centres, National Rehabilitation Hospital and Central Mental Hospital – will severely constrain the health budget up to 2030. This leaves limited funding for smaller projects, including the development of the primary care network.

As DPER recently noted, there is no comprehensive assessment of the existing stock of infrastructure in the health service, which makes it difficult to establish levels of capacity, especially on a regional basis. Establishing capacity levels should be a priority to determine what levels of investment will be required on a regional basis²⁸ to meet key policy objectives, including the migration of more services to a primary care setting.

Housing

Dublin Chamber's latest Quarterly Business Trends Survey²⁹, carried out in early August 2017, identified the cost and availability of housing as among the most pressing concerns for employees of businesses in the GDA; over four in ten firms identify this as their priority. Accommodation and associated expenses such as commuting costs have a major impact on the price of labour, and failure to moderate

house prices in the coming years will inevitably place upward pressure on wages.

The NPF has a key role in ensuring that housing is delivered where demand is highest and close to employment. However the planning framework and associated regional, metropolitan and local plans will also have a key role in ensuring that new housing should be appropriate to public needs. There is a national trend towards the formation of smaller household size.

Dublin Chamber believes that state involvement is required to ensure there is a mix of household size and types in new developments. To achieve this we propose that Local Authorities undertake Housing Needs Assessments, on a periodic basis for all for all tenure types including social, affordable, private rental and owner occupier. Housing Needs Assessments, which Local Authorities currently have to statutory duty to perform for social housing only³⁰, should include projections of demand for all tenure types for different household sizes. For example, Dublin City should undertake an assessment of the number of one-bed apartments of different tenure types compared to the number of three-bed houses of different tenure types, over the period of the Development Plan. These Housing Needs Assessments should then inform planning decisions by planning authorities in the case of individual applications.

²⁷ Wren, M. et al. Projections of Demand for Healthcare in Ireland, 2015-2030 First Report from the Hippocrates Model, Oct. 2017, <http://www.esri.ie/pubs/rs67.pdf>

²⁸ DPER, p.32.

²⁹ Available here: <http://www.dubchamber.ie/policy/business-trends-survey>

³⁰ For example, see Housing Agency, Summary of Social Housing Assessments 2016, available here: <https://www.housingagency.ie/Housing/media/Media/Publications/Summary-of-Social-Housing-Assessment-Needs-2016.pdf>

In order to achieve the brownfield and infill targets laid out in the NPF, it goes without saying that Local Authorities need to get much better at managing existing residential stock as well as under-utilised spaces with potential for residential development, such as those with commercial or industrial zoning.

In terms of managing vacancy in existing residential properties better, Dublin Chamber encourage local authorities to adopt more active vacant dwelling management. We welcome the ambition in the NPF to reform Compulsory Purchase Order legislation, to make it easier for authorities to take charge of (or at least credibly threaten to take charge of) derelict or long-term vacant properties that have residential potential. While CPO for housing purposes exists presently, they are rarely used due to well-founded hesitancy of local authorities that they will become involved in a legal quagmire with potential litigation.

In order to achieve the brownfield and infill targets laid out in the NPF, it goes without saying that Local Authorities need to get much better at managing existing residential stock

In the South West of England, including cities such as Bristol, active vacant housing strategies have met with notable success in recent years. Their purpose is to identify vacant properties and work with owners to get them back into use. All properties listed as vacant for more than 6 months are identified and added to a mailing list for regular mailings from the Council which escalates its involvement over time:

- After 6 months empty the Council sends out information on becoming a landlord or on how to approach renovating a property, in particular targeting this pool to house homeless households
- After 2 years empty the Council contacts owners directly and make visits for the property, taking action to identify the reasons for continued vacancy and working with the owner to bring about reuse using incentives like low-cost loans and leasing schemes. They can also implement Empty Dwelling Management Orders³¹
- After 6 years empty the Council use compulsory purchase proceedings to mop up the few very longstanding empties, however these are rarely used

One of the problems holding back Local Authorities in Ireland from using such active management strategies to manage vacancy is the absence of a Property Occupancy Register. Local Authorities do not know on a systematic basis which properties are long-term vacant

³¹ Under EDMOs Councils do not purchase the property from the owner, but are able to place a tenant in a property, deduct operating costs and pay residual rent to owner.

and why. While Dublin City Council is in the process of implementing a new Vacant Site Register for the levy that begins in 2019, this involves housing officers visually inspecting properties to assess their occupancy and is a cumbersome process.

Dublin Chamber proposes an active Property Occupancy Register for the Dublin Local Authorities and that pilot project funding should be provided for this purpose as part of the implementation of the NPF.

Water

Historical underinvestment in Ireland's water infrastructure has resulted in a system which is not fully capable of providing the required level of high quality drinking water or adequately treating the waste water which our society produces. This is especially true of Dublin where the certainty of water supply and waste water treatment remains a grave concern. Resilient water infrastructure is essential for Irish businesses to plan their future and is a strategic issue for any potential FDI.

Water systems in Dublin's competitor cities typically operate at around 80% capacity, while in Dublin this figure is approximately 98%. A Stanford University study in 2014

identified Dublin as the second most vulnerable city in the world to water shortages in the future. Not only is more water needed to meet demand, the supplying sources must be diversified so that the region is equipped to deal with external shocks. At present, some 85% of Dublin's water comes from a single river – the Liffey. Sewage Treatment Capacity is also a limiting factor for population growth in Dublin City and Suburbs as well as other regional cities. Pollution from waste water effluent, especially in Fingal, makes Dublin a much less attractive location for international businesses and international talent. Waste water infrastructure projects must be prioritised in Dublin and other strategic urban areas to resolve this problem and to expand treatment capacity.

The population and jobs growth targets in the NPF all point to the need for a new water supply for the Eastern and Midland region. The delivery of this additional supply should be accorded the same strategic importance as the removal of boil water notices, especially in acknowledgement of the number of people that stand to be affected by potential water shortages in the Eastern and Midland Region.

Conclusion

The NPF represents an invaluable opportunity to shape Ireland's landscape in way that improves economic competitiveness and quality of life for generations to come. Dublin Chamber will continue to make the case for the Greater Dublin Area and for well-managed urbanisation. The Chamber is currently developing a long-term vision for the Greater Dublin Area, based on consultation with a broad spectrum of business and community

stakeholders. This project, entitled Dublin 2050, will form the basis of the Chamber's future proposals on the development of the capital city region. Dublin Chamber looks forward to participating in the rest of the NPF consultation process and to engaging with the Department of Housing, Planning, Community and Local Government on the final draft and on its implementation.



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