

## **Property Industry Ireland response to Draft Ireland 2040 – Our Plan National Planning Framework**

Property Industry Ireland (PII) welcomes the opportunity to comment on the Draft Ireland 2040 Our Plan – National Planning Framework. While much in the Plan is to be welcomed, PII has some comments on a number of issues that we believe should be resolved before final adoption.

- PII has some reservations about growth targets expressed in the Draft Ireland 2040 Our Plan – National Planning Framework. The Targeted Pattern of City Population growth in Table 3.1 is extremely challenging in terms of the re-distribution of growth that it envisages from the Greater Dublin Area to the other four cities, Cork, Limerick, Galway and Waterford. The NPF states a population growth target for Dublin of 264,000 growth, a rate of 20-25% up to 2040. This compares with growth rates of 50-60% for the other four cities. Clearly this involves a very significant re-distribution of growth from current patterns and a significant reduction in population growth in the outer GDA counties of Meath, Wicklow and Kildare in particular. Notwithstanding any views on the desirability of this re-distribution, its achievement in practice of such a significant shift in population growth patterns is likely to be highly questionable. Should the growth in the Greater Dublin Area continue in line with current trends and demand, then the population growth in the GDA could well be much higher in practice than is provided for in the NPF. If this scenario does materialise, and it appears likely, then the NPF may result in a very significant exacerbation of current housing shortages in the Greater Dublin Area arising from restrictions on housing land supply in the Greater Dublin Area consequent of the NPF. Furthermore, a significant underestimation of the likely actual population growth in the GDA will lead to significant under investment in critical infrastructure necessary for the future efficient and sustainable functioning of the GDA, in particular public transport. This approach involves a risk of turning what is at present a serious short-term housing crisis, into a medium and long-term housing crisis in the Dublin region.

Furthermore, PII believes that the growth projection of one million more people living in Ireland by 2040 is far too conservative and more recent projections from the ESRI forecast an increase of 1.1 million by the earlier date of 2030. This, coupled with the growth targets for the cities and regions may be over restrictive of growth. Conservative population growth targets may lead to a reoccurrence of the current supply/demand imbalance in housing. PII therefore makes the following recommendations:

- Targeted pattern of population growth for the cities be reviewed
- Regularly review the Ireland 2040 Our Plan – National Planning Framework, including the expected population growth to ensure appropriate infrastructure spend and updating of Local Development Plans. In addition, any such review should consider any cultural and lifestyle changes due to adoption and developments in technology (driverless cars, drones etc.).
- In addition to providing a headline figure for new homes needed (550,000) by 2040, the plan should provide a breakdown of the number of new homes

needed in each region similar to what has been identified for population growth and job growth (National Policy Objectives 1b and 1c), and for housing by settlement size (Table 5.1).

- There is a greater need for clarity to whether the new home projection is based only on population, or whether it also takes into account pent-up demand due to the current housing crisis. If the figure does not account for this pent-up demand, the housing target of 550,000 should be revised upwards to reflect this.
- The growth targets should in no way be a limiting factor on the growth of any of the cities, towns or regions. It should instead be the ambition for Government to facilitate this growth through early infrastructure investment. It is therefore important that in any regular review of the Plan that these targets be updated and investment revised in consultation with IDA and Enterprise Ireland to reflect the actual situation.
- PII reiterates its call for the establishment of a National Infrastructure Authority (NIA) to prioritise and oversee the provision of infrastructure to meet the aims of the Ireland 2040 Our Plan – National Planning Framework. The Authority would provide an opportunity for infrastructure to be prioritised based on input from both national and local government, but also business and civil society to the benefit of the nation as a whole. It should be the role of the NIA to decide on the award of funds to any joint competitive bids by Departments and Local Authorities outlined in chapter 9.
- Growth in the regions should be facilitated by ambitious infrastructure investment. While it is acknowledged that regional growth outside the five cities will be guided by the Regional Spatial and Economic Plans, only through investment will jobs be created in the regions leading to the targeted growth. There should also be increased ambition for the growth of regional towns and villages.
- PII questions the wisdom of seeking to address issues of growth and urban sprawl in the Greater Dublin Area by, in effect, re-locating population growth to the other four cities on the scale proposed, particularly as these four have higher reliance on the private car and have significantly less well developed public transport infrastructure than Dublin. The net result might simply be a re-distribution of sprawl from the outer edges of Dublin to the outer edges of Cork, Limerick, Galway and Waterford. It is respectfully submitted that the solution to the sprawl is indeed the very approach set out at the core of the NPF, which is greater densification of development within existing urban areas.

This however, must be linked to a step change in investment in public transport in each of the five cities and in inter-urban transport. PII believes that even if the current housing crisis is addressed in the next few years to the significant measures undertaken by government, it is however, likely to be replaced by a transportation and movement crisis of longer duration, having regard to the seriously underdeveloped nature of Ireland's public transport system compared with other countries of similar

levels of economic development in Europe and globally. This will be exacerbated by the high levels of economic population growth forecast. It is respectfully suggested that the NPF should incorporate a clear recognition of the need for a major step change in investment in public transport to a level that has not been being envisaged to date, let alone being achieved, in order to address the existing very significant deficits and to enable continued economic development of the country and associated population growth in a sustainable manner. This represents the most significant spatial planning challenge facing the country. It is respectfully submitted that this is recognised as a key theme of the finalised NPF with ambitious targets set for future government investment to transform public transport provision in Ireland and in particular, in the five cities. Government should be ambitious in providing this infrastructure and aware of the length of time that is required to bring projects to completion. This infrastructure has both the possibility to promote achievement of the growth targets in the plan, but will also act as a limitation to growth if not put in place in advance of the required development.

- Prompt action is required to implement the recent announcements made by Minister Murphy including increasing height and density, and decreasing car parking requirements, for apartment buildings to ensure projects that would benefit can fully take advantage of these changes without delay.
- PII welcomes the increased guidance provided by Ireland 2040 Our Plan – National Planning Framework to the overall planning process. However, PII would like to express concern about any possible delays to implementation. It is important for Government to take prompt action to ensure compliance by Local Authorities and Regional Assemblies to the Plan. In particular, while PII welcomes the proposed introduction of metropolitan area strategic plans (MASPs), it is important that the implementation of these plans is properly managed through the introduction of appropriate governance structures, answerable for the good governance and success of the plan, including adherence to the National Planning Framework.
- Ireland 2040 Our Plan – National Planning Framework should provide for a headroom allowance for residential zoning throughout the country through Strategic Land Reserve Zonings. This headroom allowance could be allocated on a case-by-case basis as appropriate. This would allow for flexibility where a Development Plan is not due for revision in the short term or where existing zoning isn't available/developable for whatever reason, while at the same time respecting the overall development ambitions of the plan.
- The Plan does not take sufficient account that the expected change in demographics will have on the required stock of housing. A greater number of one- and two-bed homes will be required and the Plan should reference this in providing guidance to Regional Spatial and Economic and Local Development Plans. The Plan should also recognise recent changes to the tenure mix.

## About Property Industry Ireland

### **Our vision:**

A sustainable Irish Property Industry which is creative, responsive, competitive and well-integrated in meeting the socio-economic needs of all the stakeholders in the built environment

### **Our mission:**

To be the trusted partner and provider of “evidence based” information, policies and strategies for the property industry at National level, to the Oireachtas, Government, Local Authorities and Agencies, and for the benefit of the people of Ireland.

### **Our objectives are to:**

1. Be the Leadership Forum in the Industry for the discussion on National Property Issues
2. Develop, propose and support a National Property Strategy, policies and solutions to issues for the benefit of the nation as a whole
3. Be a research led organisation, which collates and commissions relevant and innovative research on Ireland's construction sector in order to promote & sustain a competitive economy
4. Be the go-to organisation for Government and the Oireachtas on all aspects of property
5. Work with all stakeholders in the industry to restore it to a sustainable position in the economy
6. Increase membership through demonstrating the achievements and outcomes in relation to national strategy and policy

### **PII Council:**

Tom Phillips, Tom Phillips + Associates (Chairman)

Aidan O'Hogan, Property Byte Ltd.

Patricia O'Brien, BHK Solicitors

Tony Reddy, Reddy Architecture + Urbanism

Padraic Whelan, Deloitte

Michael O'Flynn, O'Flynn Group

Jim Gallagher, Lafferty

Cormac O'Rourke, Goodbody Stockbrokers

Mark FitzGerald, Sherry FitzGerald

Michele Connolly, KPMG Corporate Finance

Ivan Gaine, Sherry FitzGerald

Colin Hunt, AIB

### **Policy Committee Chairs:**

Executive Committee –

Michael O'Flynn, O'Flynn Group

Technical and Construction Issues –

Jim Gallagher, Lafferty

Planning and Development –

John Spain, John Spain Associates

Funding Initiatives –

Michele Connolly, KPMG Corporate Finance

Market Supply and Demand –

Ivan Gaine, Sherry FitzGerald

### **Executive:**

David Duffy, Director

David Howard, Policy Executive

### **Recent publications:**

- The Property Industry – Rebuilding Ireland's Economy (2011)
- Development of infrastructure Bonds (2011)
- Real Estate Investment Trusts for Ireland (2012)
- Putting the Residential Property Market on a Sustainable Footing (2012)
- Planning a better future: a report on reform of the Irish Planning System (2012)
- Towards a National Property Strategy (2013)
- Delivering Ireland's Property Needs (2014)
- A National Spatial and Development Plan for Ireland (2014)
- The Cost of Construction in Ireland: A European comparison (2014)
- Investing in Social Housing (2014)
- Housing Manifesto (2015)
- Policy Reform to Increase the Delivery of New Housing (2016)
- Delivering Rebuilding Ireland: PII Pre-Budget 2017 Submission (2016)
- Tax Treatment of Rental Income (2017)
- Rental Strategy Response (2017)
- Pre-Budget 2018 Submission (2017)
- Submission to Rebuilding Ireland Review (2017)