

SUBMISSION ON:

**IRELAND 2040  
NATIONAL PLANNING  
FRAMEWORK**

November 2017

**CAIRN**  
PLC

Prepared by:

 **Future Analytics**  
Planning | Research | Economics



# Executive Summary

Cairn Homes plc (Cairn) is delighted to make this submission in response to the Draft “Ireland 2040 - Our Plan” National Planning Framework (NPF), recognising its importance as the principal document to define the planning and development of Ireland’s future.

The NPF is a necessary replacement for the dated National Spatial Strategy and its statutory basis is greatly welcomed as a means to create certainty and clarity for central government, regional assemblies, local authorities, developers and the public. The establishment of the Office of the Planning Regulator is a progressive means through which to successfully realise the plan and its independence will be key to securing same. The careful application of the NPF in the anticipated Regional Spatial and Economic Strategies (RSESs) will be necessary to guarantee translation at local levels.

However, while many of the principles underlying the NPF are to be commended, Cairn wishes to make a series of observations regarding the Framework’s content:

- While development of the regions is supported, this should not be at the expense of the Greater Dublin Area. The NPF must ensure growth of the Greater Dublin Area is not hindered if the other regions fail to meet their targets;
- Cairn supports the need to increase residential densities in order to maximise returns from investment in infrastructure and services. Higher densities should also be supported where schemes provide high-quality environments;
- The NPF and the National Investment Plan should be aligned to maximise returns on public and private investments, provide certainty and avoid bottlenecks that hinder deliverability. The timely delivery of infrastructure is critical to ensuring the success of the NPF;

- The tiered approach to zoning appears overly prescriptive. Cairn is of the opinion that all lands should be treated equally in terms of their priority. Ensuring the appropriate zoning of lands is key to the timely delivery of housing;
- Development management standards are appropriately defined at the local authority level. However, Cairn welcomes the NPF’s recognition of the requirement for more flexibility in this area, subject to proper design; and

Cairn looks forward to the publication of the Final NPF and hopes that the salient points of the following submission are considered, and enacted where relevant.





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# 1 Introduction

Future Analytics Consulting Ltd. (FAC) has prepared this submission to the draft stage of the “Ireland 2040 - Our Plan” National Planning Framework (NPF) on behalf of Cairn Homes plc (Cairn). Cairn would like to commend the Irish Government, and specifically Eoghan Murphy TD, Minister for Housing, Planning and Local Government and his Department for the preparation and publication of the NPF.

As a replacement to the National Spatial Strategy (NSS), the NPF is a vitally important roadmap for this country and is recognised as the foundation for Ireland’s future development. As such, Cairn welcomes the opportunity to make a submission to the Government in relation to this Draft NPF, and to outline a series of insights, perspectives and suggestions on what should be incorporated in the finalised NPF. Over the coming years, Cairn will play a very important part in addressing the housing supply in Ireland and, as such, it is important to provide contributions to the emerging content of the framework.

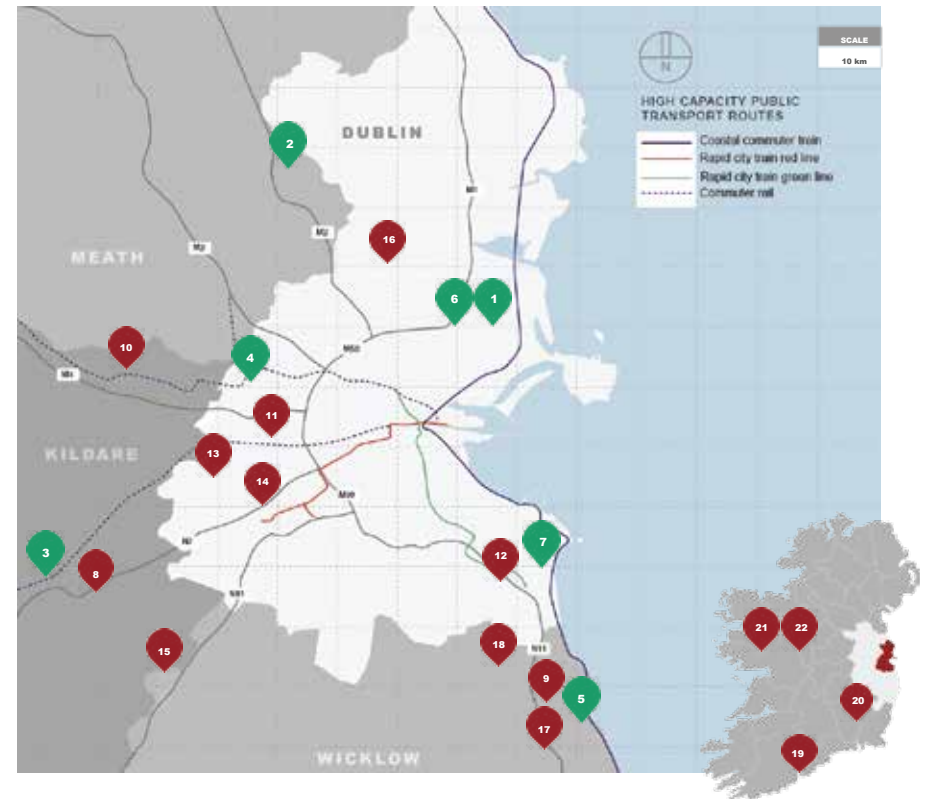
## 1.1 About Cairn Homes Plc

Cairn is an Irish homebuilder founded in 2014 with a clear strategy to deliver high quality new homes with an emphasis on design, innovation and customer service. Following a successful initial public offering (IPO) in June 2015 to raise funds to finance the development of new homes in Ireland, Cairn is actively engaged in the delivery of some 13,000 homes over the coming years.

These homes are being delivered on a land bank across the country which is predominantly within the Greater Dublin Area, but also in Cork, Galway and Kilkenny. There is an adopted focus on design driven by creating sustainable communities and with the average site delivering in excess of 400 new homes Cairn has the capacity to deliver these new homes in the short-medium term. Cairn is led by a highly experienced management team with a proven track record in delivering high quality residential properties at scale in Ireland and the UK, supported by a high calibre and experienced wider team.

Cairn is committed to working with national and local government, and other state bodies, to meet the changing housing needs of Ireland, and ensure the timely delivery of functioning, sustainable residential communities.

WELL LOCATED HOUSING SITES WITH EXCELLENT PUBLIC TRANSPORT AND INFRASTRUCTURE LINKS



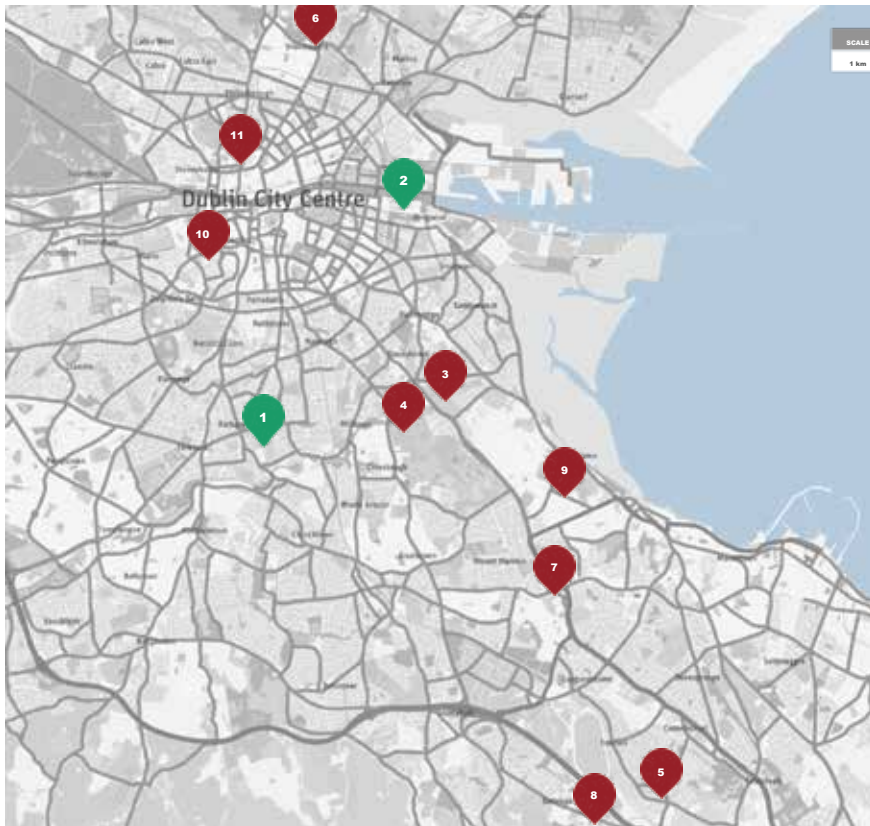
### Active

1.	Parkside, Malahide Road	433
2.	Churchfields, Ashbourne, Co. Meath	397
3.	Eismore, Naas, Co. Kildare	415
4.	Shackleton Park, Lucan	1,097
5.	Glenheron, Greystones, Co. Wicklow	490
6.	Parkside NAMA JV	71
7.	Albany, Killiney	20

### Future

8.	Craddockstown, Naas, Co. Kildare	15.	Blessington, Co. Wicklow
9.	Coolagad, Greystones, Co. Wicklow	16.	Swords, Co. Dublin
10.	Mariavilla, Maynooth, Co. Kildare	17.	Farrankelly, Delgany, Co. Wicklow
11.	Clonburris, Dublin 22	18.	Enniskerry, Co. Wicklow
12.	Cherrywood, South Co. Dublin	19.	Douglas, Cork
13.	Newcastle, Co. Dublin	20.	Kilkenny
14.	Citywest, Dublin 24	21.	Rahoon, Galway
		22.	Ballymoneen, Galway

PRIME APARTMENT SITES IN AND NEAR DUBLIN CITY CENTRE



Active	Units
1. Marianella, Rathgar, Dublin 6W	231
2. Hanover Quay, Dublin 2	122

Future	Units
3. Montrose, Dublin 4	
4. Donnybrook, Dublin 4	
5. Barrington Tower, Carrickmines, Dublin 18	
6. Griffith Avenue, Dublin 9	
7. Stillorgan, Co. Dublin	
8. Glenamuck Road, Carrickmines, Dublin 18	
9. Cross Avenue, Blackrock, Co. Dublin	
10. Cork Street, Dublin 8	
11. Blackhall Place, Dublin 7	

1.2 Objectives of this Submission

While setting the scene for Ireland, this submission has two objectives and is structured as such:

- To argue in favour of the need to ensure the continued growth and development of the Greater Dublin Area in a sustainable fashion.
- To share a series of key insights into the implementation of the NPF to ensure:
  - a. enhanced, yet sustainable, housing delivery;
  - b. superior urban environments; and,
  - c. better quality of life for all.

The supply of housing continues to fall short of meeting demand and the NPF provides an opportunity to address this national issue; the impacts of which are both social and economic. The Final NPF must be a robust proposition to secure Ireland’s future in terms of sustainable and successful population growth and housing delivery, social improvement, economic development and environmental protection; all of which are inherently linked.

The Plan we make now will define our future development and the NPF’s expected statutory basis and the establishment of the Office of the Planning Regulator are to be welcomed. This creates certainty. However, meaningful investment is vital to securing the many National Policy Objectives contained within the Draft NPF and funding from central and local government must be forthcoming, targeted and sufficient. This guarantees deliverability. Finally, we must recognise our strengths and our weaknesses and while remaining aspirational and progressive, we must be

## Setting the Scene: National and Regional Profile

Ireland's ability to provide well-paid jobs and good-quality public services like health, education and social protection relies upon us being able to sell our goods and services abroad. That requires a competitive economy and it also requires effective land use planning policy that is flexible and supports evidence based planning and decision making.

Equally, understanding the key trends in urbanization likely to unfold over the coming years and recognising the role Ireland's cities play in driving national competitiveness will be crucial for Ireland to operate in this globalised world. The ability to attract jobs, talent, and investment is now as much between city regions as between nation-states. Dublin, Cork, Galway, Limerick and Waterford cities act as engines of growth for Ireland, enabling their functional regions and by extension the country to grow to its potential. With a strategic location, both nationally and relative to their surrounding environs, these cities act as the main providers of the area's social and economic infrastructure and support services.

42% of the population growth in Ireland over the past 20 years (since 1996) has been in urban areas. 33.8% or 1,609,478 of the country's population now live in the 5 most populous urban areas (Dublin, Cork, Limerick, Galway, Waterford [city and suburban areas]). Dublin alone accounts for over a quarter of total population (28.4%), while the Greater Dublin Area's population exceeds 1.9 million (40.1% of total population).

**52.2%** of all daily work/college movements are to the 5 major city & county areas.

**837,062** people or 30.4% of the population of Ireland commute to work/college to Dublin.

**142,163** persons commute to Dublin for work/college from outside of Dublin.

## Global Ireland

Ireland's economic prosperity is inextricably linked to how competitive we are internationally. To protect its economy, Ireland must address those competitiveness factors that are within its control. Understanding the key trends in urbanization likely to unfold over the coming years and recognising the role Ireland's cities play in driving national competitiveness will be crucial for Ireland to operate in this globalised world. The ability to attract jobs, talent, and investment is now as much between city regions as between nation-states.

### Key Facts

Ireland's national unemployment rate is now 6.0% (October 2017), it's lowest level in 9 years. This rate is significantly below EU (7.6%) and Eurozone (9.1%) averages.

Exporting companies created 1 in every 2.5 additional jobs in Ireland since 2012.

Only English speaking country in the Eurozone.

15% of Ireland's workforce is international. Proportionally Ireland has the 3rd highest international workforce in the EU.

Youngest Population in the EU: 33% under 25 (EU 28: 26.8%).

Irish labour productivity is 74% above the EU 27 average.

Multinationals make a significant contribution to the Irish Economy;

**10%**

of total Employment in Ireland (2016)

**64%**

of Exports (2016)

**65%**

of RD&I Investment + 14,000 R&D staff (2015 & 2016)

**80%**

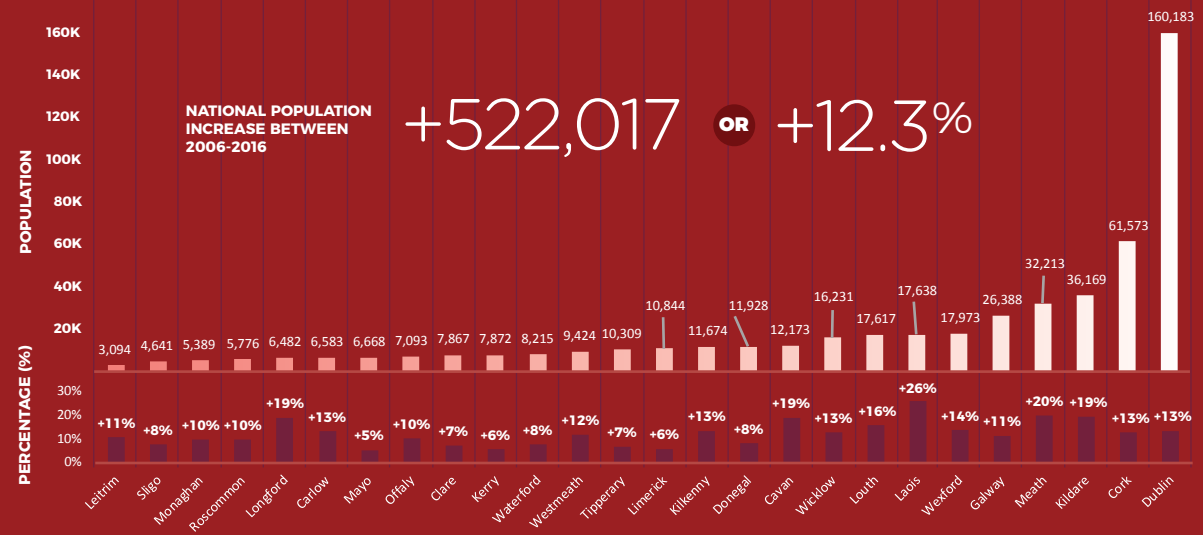
of Corporation Tax (2015)

(Source: IDA, 2015)



# Population Distribution in Ireland over the Past Decade (2006-2016)

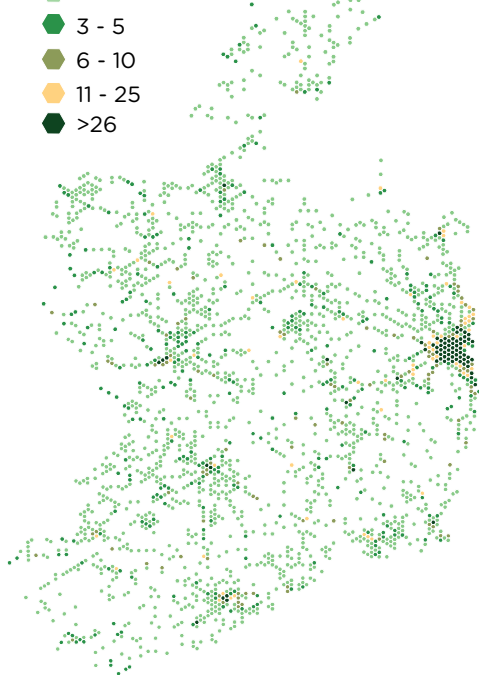
The state has experienced a population increase of +12.3% over the past decade from 4,239,848 in 2006 to 4,761,865 in 2016. Population living in urban areas has increased by +16% from 2,574,313 to 2,985,781.



## Public Transportation Access Ireland, 2016

No. Public Transport Stops - Bus + Rail + Air + Ferry (stops/7km2)

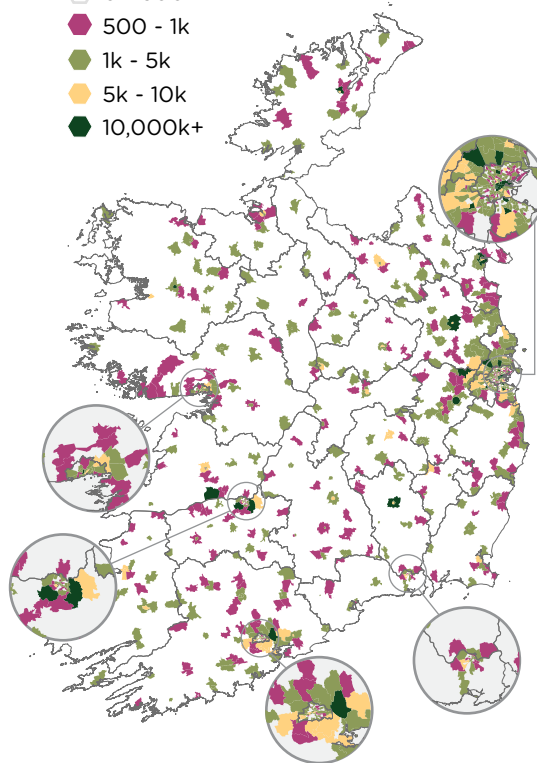
- 0
- 1 - 2
- 3 - 5
- 6 - 10
- 11 - 25
- >26



## Job Density Ireland, 2016

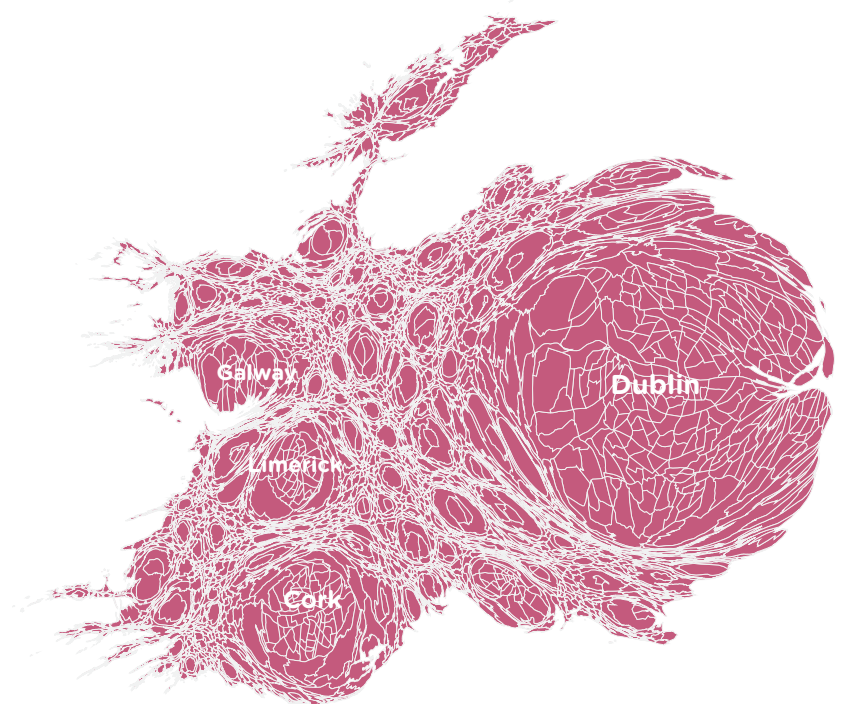
Jobs by Location, 2016

- 0 - 500
- 500 - 1k
- 1k - 5k
- 5k - 10k
- 10,000k+



## Population Growth Ireland, 2016

Cartogram of population distribution at ED level



# Dublin as a Driver: Dublin City Region

It is important for the NPF to reflect the status and role of the Dublin City Region for the benefit of the State, with this region comprising more than the 'metropolitan core' administered by the four Dublin Local Authority areas (which of itself has a population in excess of 1.34 million persons), also including the urban settlements across Kildare, Meath and Wicklow. The Draft NPF definition of a city region is adopted from OECD/EC research whereby it is a "commuter catchment from which at least 15% of the relevant city area workforce is drawn". Irrespective of definition, in functional spatial planning and socio-economic terms, the Dublin City Region is without question Ireland's leading region, with a diverse population and economic base, atop the existing national settlement hierarchy, and ultimately acting and competing at an international level. The principal centres within these county locations all play a key supporting role within the Dublin City Region, complementing its size and scale. Indeed, from an economic development perspective directly influencing the positioning of the Irish economy, it has developed key locations of economic activity and employment. The result is that 30.4% of the c. 2.75 million people travelling to work, school or college go to Dublin. 20.7% go to the other counties of Leinster.

**46.9%**

(244,796 persons) of population growth has occurred in the Greater Dublin Area

A further **20.5%**

of population growth has occurred in the other 4 major cities (Cork, Galway, Waterford and Limerick)

In 2016, Dublin accounted for

**24.6%** or a

quarter of the total national population

## Dublin's Competitiveness

"Big cities in small countries and especially in small open economies, such as the Dublin city region, have a particularly critical role in responding to the specific opportunities and challenges of globalisation and in driving national economic performance. Dublin faces challenges in maintaining its competitive position and supporting economic growth, while simultaneously delivering a high quality of life and an acceptable environmental footprint."

**Dublin City Council Chief Executive, Owen Keegan**

## Key Facts

In 2016, Dublin accounted for 24.6% or a quarter of the total national population

**46.9%** (244,796 persons) of population growth between 2002-2016 has occurred in the Greater Dublin Area

Dublin, Wicklow, Meath and Kildare account for half of Ireland's GDP (**49.6%**).

Dublin has an ideal location from which to access the EU, the world's largest single market with more than 500 million customers, is english-speaking and has a well-developed rail, lightrail and road network and is easily accessible by air and sea.

**50%** of the world's top banks,

**250** global financial institutions

**17** of the world's top 25 medical technology companies.

The Dublin City Region is the fulcrum of the country's national and international transport infrastructure, with major roads radiating from the city to the north, south and west linking with the four other cities: Cork, Galway, Limerick and Waterford. Dublin International Airport and Dublin Port are globally connected, with the former catering for over 27 million passengers in 2016 and the latter handling nearly 50% of the State's trade.

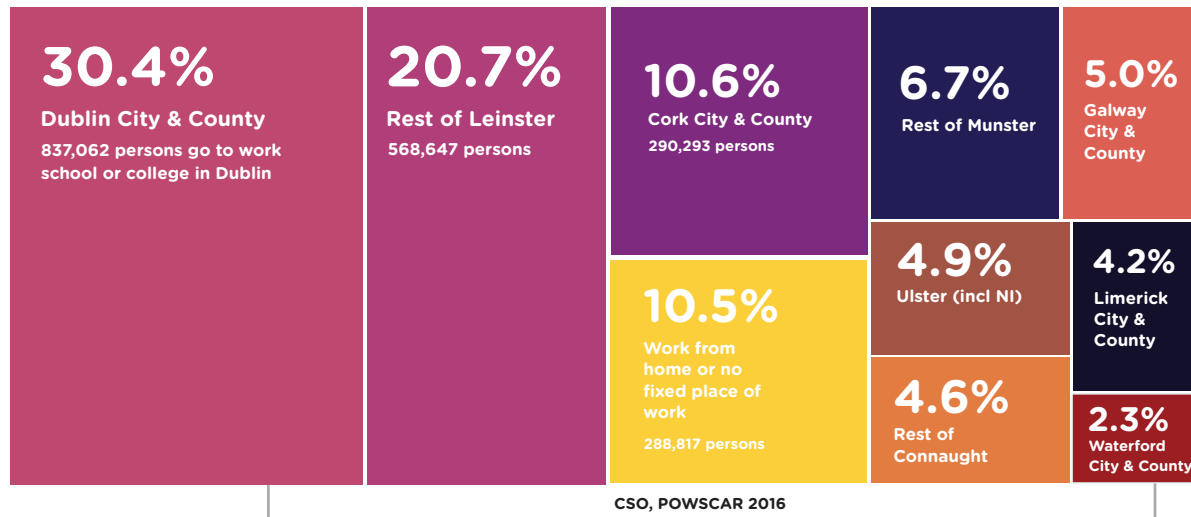
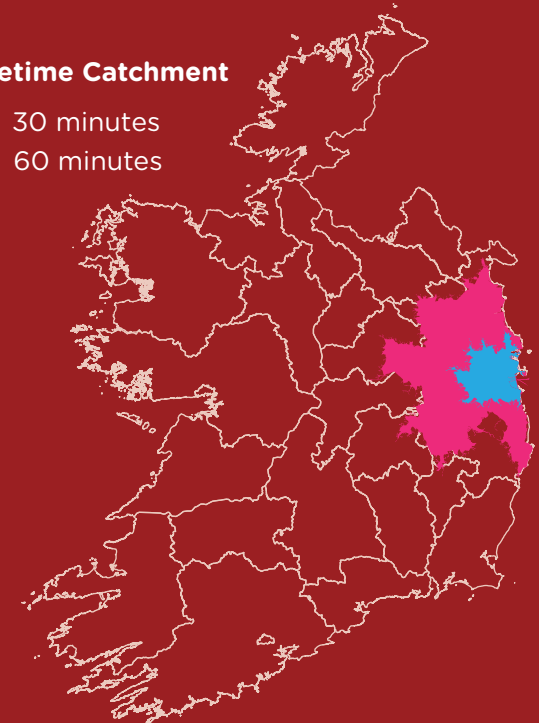
Dublin's Gross Value Added (GVA) per person reached €62,017. This is 63% greater than the per person GVA for the State which stood at €38,100. Similarly, the per person Gross Domestic Product (GDP) for Dublin stood at €68,208 in 2014, compared with €41,904 per person for the State. People drive the economy through the utilisation of knowledge, but also by the creation and provision of goods and services. With the largest population, workforce and economic base in Ireland, the Dublin City Region has scale that is unmatched nationally and provides Ireland with a global platform. It is also a centre for education and research with three universities, four institutes of technology and numerous other colleges (publicly and privately funded) in County Dublin, and a university in Maynooth.

## Key Statistics

- 42.8% of national population within 1 hr drive
- 42.6% of all daily commutes are to areas within 1 hr
- 48.7% of the country's 3rd level qualified population is within 1 hr
- 39.2% of all housing in the country is located within 1 hr of the centre of Dublin city

### Drivetime Catchment

- 30 minutes
- 60 minutes



**Functional Economic Areas**  
Population travelling to work, school or college in 2016

**2,750,239 persons**

Indicator	30 mins	% of national	60 mins	% of national
Population	1,444,002	30.3%	2,039,584	42.8%
Destination of Daily Commuting	731,591	26.6%	1,170,708	42.6%
Housing	563,529	28.1%	786,291	39.2%
Educated Workforce	385,371	37.2%	503,901	48.7%

# Strengthening the Urban Agenda in Ireland

The trend towards further urbanisation is set to continue and Cairn recognises the need for sustainable urban development. Urban areas, and cities in particular, are the primary locations for economic activity, and people and businesses are drawn to them for this very reason. As the Draft NPF correctly points out; **“Employment trends indicate that increasingly, city regions are the focal point for internationally mobile investment. High-value added services are attracted primarily to urban areas, and cities are competing with other cities internationally”** (Draft NPF, p. 42).

Importantly, cities and other urban centres are more than just about economics and places where people work. They are also where people live. High-quality and attainable housing, education, healthcare, leisure activities, services, retail options and natural and built environments are vital for the creation of attractive, desirable and successful urban places.

## 3.1 Ireland's Cities

While Dublin is the national capital and the economic and political centre, it is well connected with Ireland's other cities – Cork, Galway, Limerick and Waterford – via established high-quality road and rail networks. The relationships between the cities is complementary and hierarchical. The structuring of Ireland's cities, towns and villages as the optimal locations for future development is preferred and National Policy Objective 7 is welcomed **in principle**:

“Strengthen all levels of Ireland's urban structure, with a particular focus on:

- Our Capital, Dublin.
- The four Cities of Cork, Limerick, Galway and Waterford.
- Large towns (>10,000 population) located outside the five city regions and particularly in the northern and western region.
- Small towns (<10,000 population) located outside the five city regions in conjunction with their surrounding rural areas” (Draft NPF, p. 46).

However, notwithstanding the foregoing, the NPF notes the view of the Economic Social Research Institute (ESRI) that there will be:

**“an ongoing shift in population and jobs towards the east and to the counties around Dublin”** (Draft NPF, p. 25).

In this context, it is of concern to Cairn that the Draft NPF also notes:

**“Practical experience and research shows that in an economy and society such as Ireland's, simultaneously fostering economic growth on the one hand and spreading it out smoothly or evenly across a country, is neither realistic nor practical. Nor can large numbers of people be directed to selected locations.”** (Draft NPF, p. 25)

Reviewing the principles of the Draft, it appears that contrary to the above statement, the NPF is attempting to spread growth “out smoothly or evenly across” Ireland by distributing considerable populations across all cities and towns (although with a lower rate in Dublin). Yet, while public investments in and commitments to the cities of Cork, Galway, Limerick and Waterford are vital to ensure that they can become and remain robust social, cultural and economic

centres outside of the Greater Dublin Area, such a distribution of growth must not result in an incoherent diffusion of investment and economic activity to the detriment of the Greater Dublin Area, as the State's leading urban region and international competitor.

It is accepted that focused regional development in the cities will have the potential to protect rural areas and prevent the emergence of sprawl that has negatively affected parts of the outer Eastern and Midland Region in recent decades. However, it is important to recognise the importance of successful and self-reliant towns in accommodating population growth in sustainable way. Many of the GDA's settlements remain heavily reliant on key infrastructural provision in order to unlock their considerable potential.

The Draft NPF correctly remarks that "...it is necessary to learn from the past experiences and set out a new way forward that can channel future growth to drive our longer-term national development objectives and vision" (Draft NPF p. 29). The hierarchical ordering of Irish cities is reflective of Ireland's status as a small island country and the limitations that this can have when competing internationally for investment. Having a single, large urban settlement that can compete on the world stage is vital for such countries.

### **3.2 Growth, Scale and Investment: Delivering an Efficient GDA and Securing Effective Regional Performance**

Despite recognising the importance of strengthening the regional cities of Cork, Galway, Limerick and Waterford, they should not be prioritised in lieu of the Greater Dublin Area. The targeting of higher proportional population growth in these four cities and approximately average rates to Dublin may have the potential of undermining this Region's competitiveness and international edge. In considering alternative approaches, such a concern is raised as a possibility in the Draft NPF:

**"Seeking to grow the Northern and Western and Southern regions significantly more than the Eastern and Midlands region would demand some level of constraint on the growth of Dublin.**

**This, together with the comparatively much smaller size of regional cities, could result in diminishing the scale of overall national development"** (Draft NPF p. 34).

However, the selected population targets and growth rates (National Policy Objectives 1b and 1c, below) for Ireland's future can easily be considered as being 'significant' for the Northern and Western and Southern regions when compared with Dublin. This is particularly worrying having acknowledged the potential impact that this may have on Dublin and Ireland.

## National Policy Objective 1b

Eastern and Midland Region: a targeted 475,000 - 500,000 (0.475-0.5m) additional people, i.e. a population of around 2.8 million;

Northern and Western Region: a targeted 150,000 - 175,000 (0.15-0.175m) additional people, i.e. a population of around 1 million;

Southern Region: a targeted 350,000 - 375,000 (0.35-375m) additional people, i.e. a population of almost 2 million. (Draft NPF p. 35)

## National Policy Objective 1c

Eastern and Midland Region: around 330,000 (0.33m) additional jobs, i.e. at least 1.33 million in total;

The Northern and Western Region: around 110,000 (0.11m) additional jobs, i.e. at least 450,000 (0.45m) in total;

The Southern Region: around 220,000 (0.22m) additional jobs, i.e. at least 880,000 (0.88m) in total (Draft NPF p.35).

Cairn wishes to express a serious concern in relation to National Policy Objective 8 and the associated Table 3.1, detailed below. According to the Policy Objective, if the cities of Cork, Galway, Limerick and Waterford fail to grow at the rates envisaged, Dublin's growth may have to be curtailed so as to remain "proportionate" to these cities. This implies that a restriction would be placed on Dublin and Cairn strongly opposes any such necessity and even its conception. Therefore, the Final NPF should be amended to remove any reference to the growth of each city (particularly that of Dublin) having to be "proportionate" to the other cities.

## National Policy Objective 8

Ensure that the targeted pattern of population growth of Ireland's cities and large towns to 2040 is proportionate, in accordance with the targets set out in Table 3.1 (Draft NPF p. 47).

City	Population 2016	Population Growth to 2040		Target Population 2040
		% Range	People	
Dublin - City and Suburbs	1,173,000	20-25%	264,000	1,437,000
Cork - City and Suburbs	209,000	50-60%	115,000	324,000
Limerick - City and Suburbs	94,000	50-60%	52,000	146,000
Galway - City and Suburbs	80,000	50-60%	44,000	124,000
Waterford - City and Suburbs	54,000	50-60%	29,000	83,000

Fundamentally, Dublin will continue to be attractive for inward foreign direct investment and infrastructure must be delivered to serve demand. If necessary attention, efforts and investment is diverted away from the Greater Dublin Area it may leave the region exposed, as other countries focus on the expansion and improvement of their city regions. An inward-looking national perspective that simply focuses on Ireland's own growth could blind the country from what is happening elsewhere in the competitive global economy. This is particularly important because although Dublin and the Greater Dublin Area is significantly larger than Ireland's other cities and scaled enough to allow it to compete internationally, it is still markedly smaller than many of its international competitors.



### 3.2.1 Growth in Ireland's Towns

As with Ireland's cities, the Draft NPF has targeted inconsistent rates of growth for Ireland's large towns (>10,000 population):

**“Within both the Eastern and Midland and Southern Regional Assembly areas, overall targeted population growth for large towns with >10,000 population in 2016 should generally be 20-25%, which is ahead of projected national average growth. The purpose of this is to accommodate focused and proportionate growth while preventing excessive levels of city generated overspill development in certain locations.**

**In recognition of a significantly weaker urban structure in the north and west of Ireland, overall targeted population growth for large towns with >10,000 population in 2016 within the Northern and Western Regional Assembly area, should generally be 40%, or almost twice projected national average growth” (Draft NPF p. 48).**

This is of concern to Cairn as the towns within the Eastern and Midland Region are already acting in an existing supportive and complementary role within, and as an integral part of, the Greater Dublin Area. They are generally adequately zoned and serviced, with established transportation links with and within the region. As with the potential restriction on Dublin City's growth, prioritising other large towns to the possible detriment of those in the Greater Dublin Area should not occur. Future investment and growth in the towns of the Eastern and Midland and Southern Regions (particularly the former) will result in a superior return on investment, greater efficiencies and enhanced sustainability. Consequently, the Final NPF should reflect this and amend references in the NPF that may restrict growth; notably commentary relating to “proportionate” growth, which implies the possibility of restrictions being placed on the growth of the Eastern and Midland and Southern regions' towns should the towns in the Northern and Western region not grow at the targeted rate.

Aside from the settlements within the City Council, South Dublin and Dun-Laoghaire Rathdown areas, relevant towns in the rest of the Greater Dublin Area include:

<b>Fingal</b>	Swords, Balbriggan, Blanchardstown, Rush/Lusk and Donabate
<b>Meath</b>	Navan, Kells, Trim, Ashbourne, Dunshaughlin, Dunboyne, Ratoath and Drogheda.
<b>Kildare</b>	Naas, Maynooth, Newbridge, Leixlip, Celbridge, Kildare, Monasterevin, Athy, and Kilcullen
<b>Wicklow</b>	Bray, Greystones, Wicklow, Arklow, Blessington and Newtownmountkennedy

It is prudent to note that the current Regional Planning Guidelines generally seek approximately 70% of all growth to be directed to designated growth towns, and it will be important for the NPF to clearly articulate how a sustainable approach to the continued development of these settlements is best achieved, rather than any assertion that the growth in population within these designated settlements was excessive or ill-conceived.

Cairn fully acknowledge that it will be important to address infrastructural bottlenecks, improve connectivity/accessibility and citizens' quality of life, and to increase housing supply in the right locations, but the idea of stemming metropolitan growth within settlements which are wholly suited to and capable of facilitating new homes for a growing population, is unjustified.



### 3.2.2 Opportunities for the Future of the Greater Dublin Area

Nonetheless, there are numerous encouraging statements regarding prospects for the Greater Dublin Area, such as: **“Supporting the continued growth and success of Dublin as Ireland’s leading global city of scale and principal economic driver, by better managing Dublin’s growth to ensure that more of it can be accommodated within and close to the City”** (Draft NPF p. 31).

The perception that growth in the Greater Dublin Area is a sprawl from Dublin City should not be perpetuated in the NPF. While the Draft NPF readily alludes to the (over-)dominance of Dublin and perceived unsustainable pressures therein, **its existing size and scale (spatial, demographic and economic) are the assets that should be seized as key opportunities. They provide critical mass and efficiencies - vital for successful “compact, smart growth”** (Draft NPF p. 123) - that simply cannot be matched elsewhere. The growth of Dublin, and indeed the Greater Dublin Area, can and should be sustainably harnessed through stronger local and national government commitments and investments in public transport and services, as well as other vital infrastructure. The pressures of Dublin and the Greater Dublin Area will only be exacerbated if efforts are not made to maximise the opportunity that they present.

Promoting a strong focus on the Greater Dublin Area as a population and employment centre of scale is vital and efforts such as that espoused by National Policy Objective 46 are vital; “In co-operation with relevant Departments in Northern Ireland, to further support and promote the sustainable economic potential of the Dublin-Belfast Corridor and enhance its international visibility” (Draft NPF p. 101). Yet to successfully secure this, the Greater Dublin Area must not be hindered or deprioritised, with investment delivered in conjunction with attaining critical mass.



**its existing size and scale (spatial, demographic and economic) are the assets that should be seized as key opportunities. They provide critical mass and efficiencies - vital for successful “compact, smart growth” - that simply cannot be matched elsewhere.**



The “future growth enablers for Dublin” (Draft NPF p. 53) will have a significant, positive impacts on the growth of the Greater Dublin Area. Investment in public and active transport (Metro, Luas, DART, bus, cycle, etc.) are amongst these enablers, and will support greater population growth in the future. They will both require and justify higher residential and employment densities, resulting in greater efficiencies and urban sustainability. These large investments will not be viable without the populations necessary to sustain them and will be more successful with the considered identification and targeting of key development locations. Importantly, this infrastructure will also connect with the towns of the Greater Dublin Area to create a world class “City Region”.

**Such infrastructure, combined with the Greater Dublin Area’s size (including Dublin City), will have the capacity to cater for a substantial portion of the 550,000 homes estimated by the Draft NPF as being needed nationally between 2017 and 2040(c. 24,000 per annum). Cairn wishes to reiterate that Dublin’s potential growth should not be restricted to be proportionate to the other cities, as it can accommodate significant population and employment increases<sup>1</sup>. The Final NPF should be amended to remove references to proportional growth.**

<sup>1</sup>See the former Department of Environment, Community and Local Government’s (2014) Residential Land Availability Survey and SCSi’s (2014) Housing Supply Capacity study.

# 4 Implementation of the NPF

The successful implementation of the NPF will provide Ireland with an opportunity to redefine itself for the future. The Draft NPF's confirmation of a statutory footing is to be welcomed as this provides Cairn with greater certainty in its operations. However, the application of the Draft NPF's vision and objectives and their adoption in the forthcoming Regional Spatial and Economic Strategies (RSESs) will be vital and should be done with considered and coherent approaches. The RSESs must guide strategic planning and reaffirm the role of individual Development Plans and Local Area Plans to prescribe development management standards and to affect the desired sustainable approach to planning and development.

Cairn wishes to stress the need to ensure that as a country we learn from both the shortcomings of the NSS and the decisions made that ultimately undermined its purpose and potential for success. In this regard, it is submitted that the establishment of the Office of the Planning Regulator as an intendent monitoring body is a positive and progressive action. Local and Central Government must heed the realities and directions of the Office if the NPF is to be delivered as prescribed.

## 4.1 Delivering Quality Housing and Communities

As one of Ireland's premier homebuilders, Cairn is passionate about delivering high-quality housing and the creation of vibrant communities and support National Policy Objective 33, targeting the construction of 550,000 new homes up to 2040. Cairn agree that **"the long term vision for Ireland's housing future [should] aim...to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, town, villages and rural areas good plans to live now and in the future"** (Draft NPF p. 85).



**Ireland's future homes will... be delivered in our cities and larger towns (where large scale housing demand exists), where homes and the appropriate supporting services can be delivered more efficiently and effectively at less cost to the State in the long-run (Draft NPF p. 86).**



Allied to this is delivering housing in the correct **"locations where people have the best opportunities to access a high standard of life"** (Draft NPF p. 86). National Policy Objective 34 - **"Prioritise the provision of new homes at sustainable locations and at an appropriate scale relative to location"** (Draft NPF p. 86) - should be adhered to and is inherently linked to transport and other infrastructure and services, development density and quality. This infrastructure and these services must be provided and adequately funded, as discussed below.

While the cities, and Dublin in particular, should be prioritised as the optimal locations for housing delivery due to their existing scale, infrastructure and services, their supporting towns should be supported as self-sustaining places in which to live, work and visit. For the Greater Dublin Area, this includes the towns listed in Table 1 above. The Draft NPF (p. 86) accepts this as being appropriate: **Ireland's future homes will... be delivered in our cities and larger towns (where large scale housing demand exists), where homes and the appropriate supporting services can be delivered more efficiently and effectively at less cost to the State in the long-run.**

Cairn also recognises that quality of life is an inherent part of the Draft NPF. In many respects, quality of life starts at home and 'Material Living Conditions' are the first of nine "elements supporting quality of life" as identified by the Draft NPF (p. 74).

Cairn is dedicated to building high-quality homes and recognise that the creation of high-quality built environments and enhanced liveability are broader, but related considerations. The details of appropriate development management standards are and should remain contained within and integral to Development Plans and Local Area Plans.



## 4.2 Urbanisation and Densities

National Policy Objective 10 – “There will be a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate planning standards and achieving targeted growth” (Draft NPF p. 51) – is an important point from which to commence. Low density urban and suburban development densities have been a characteristic of recent decades in Ireland’s cities and towns, resulting in urban sprawl. The Draft NPF (p. 38) describes the consequence of this as follows:

- “a constant process of infrastructure and services catch-up in building new roads, new schools, services and amenities and a struggle to bring jobs and homes together, meaning also that there are remarkably high levels of car dependence and that it is difficult to provide good public transport;
- a gradual process of run-down of city and town centre and established suburban areas as jobs, retail and housing move out, leaving behind declining school enrolments, empty buildings and a lack of sufficient people to create strong and vibrant places, both day and night; and
- most development takes the form of greenfield sprawl that extends the physical footprint of our urban areas, and when it is the principal form of development, works against the creation of attractive, liveable, high quality urban places in which people are increasingly choosing to live, work and invest.”

The Draft NPF recognises this and “**analysis in preparing Ireland 2040 shows that more than anything else, getting the physical form and location of future development right offers the best prospects to unlock regional potential**” and to realise “**compact or smart development**” (Draft NPF p. 38). Correctly, the Draft NPF (p. 87) states that:

“**well designed and located higher density housing will assist: Fast-growing urban areas to achieve much needed scale; medium-sized urban areas to find a route to quality in a new competitive framework; all urban areas to increase vibrancy and vitality; Increased efficiency and sustainability in the use of energy and sustainability in the use of energy and public infrastructure**”.

Cairn agrees with the need to increase urban and suburban densities “**...in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights**”, per **National Policy Objective 37** (Draft NPF. 87). The development boundaries of existing settlements have been defined during Development Plan and Local Area Plan preparations, informed by evidence-based approaches. The targeting of future development within the built-up envelopes (see National Policy Objectives 3a, 3b and 3c, below) will require future analysis that will be necessary as part of the proposed tiered approach to land zoning and the prioritisation of development lands. However, Cairn is concerned about these two new approaches inhibiting the availability of residential land and the delivery of housing. (see section 4.3).

### National Policy Objective 3a

“Deliver at least 40% of all new homes nationally, within the built-up envelope of existing urban settlements” (Draft NPF p. 38).

### National Policy Objective 3b

“At least half (50%) of all new homes in the five Cities and immediately adjoining suburban areas of Dublin, Cork, Limerick, Galway and Waterford would be delivered within the built-up envelope of existing urban settlements” (Draft NPF p. 39).

### National Policy Objective 3c

“In areas other than the five City and suburban areas of Dublin, Cork, Limerick, Galway and Waterford, at least 30% of all new homes would be delivered within the built-up envelope of existing urban settlements” (Draft NPF p. 39).

Cairn suggests that as per the UK's National Planning Policy Framework (NPPF); **“policies...should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay”**<sup>2</sup>. On this basis, high-density developments should be supported in principle where there is good-quality infrastructure, thereby reducing the pressures and delays associated with ex-urban, greenfield development and uncoordinated sprawl.

Conversely, while the Draft NPF has sought to promote higher densities it has not addressed low-density residential designations often prescribed by local authorities. In some instances, local authorities have retained lower densities in areas where existing high-quality public transport, retail and service provision is available and where lands are proximate to town centre locations. Such an approach to planning and development is not sustainable, efficient or supportive of vibrant and viable towns and cities. The Final NPF should actively seek to harness the most efficient use of urban land and to oppose unsustainable densities.

Beyond housing and accommodating population growth, densification also relates to employment, and its integration with public transport is key for creating vibrant, viable and successful urban centres. Cairn supports the inclusion of National Policy Objective 2a; **“Population and jobs growth will generally be aligned to occur within the same functional area, whether a city or town catchment or all or part of one or more adjoining local authority area(s), on a coordinated basis through the Regional Spatial and Economic Strategy (RSES) and City and County Development processes”** (Draft NPF p. 37). With regard to this, the delivery of the RSESs to appropriately plan for economic development and employment locations will be crucial to effectively deliver National Policy Objective 2b;

**“At least half (50%) of future population and jobs growth will be focused in the five Cities and their immediately adjoining suburbs with a target of around two-thirds (66%) to be focused in the cities and their suburbs together with a number of large regionally distributed towns and their environs to be identified through the Regional Spatial and Economic Strategy (RSES) process”** (Draft NPF p. 37).

The successful application of higher urban densities will be contingent on securing National Policy Objective 28 which is to “ensure the integration of

safe and convenient alternatives to the car into the design of our communities, by integrating physical activity facilities for all ages, particularly prioritising walking and cycling accessibility to both existing and proposed future development, in all settlements” (Draft NPF p. 79). This will also positively impact public health by facilitating active modes of transport and integration with public transport, in line with National Policy Objectives 26 and 61, outlined below. However, to achieve this, infrastructural investment must be forthcoming and appropriately geared towards addressing these needs.

“**policies...should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay.**”

”

### National Policy Objective 26

“Support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan, through integrating such policies, where appropriate and at the applicable scale, with planning policy” (Draft NPF p. 79).

### National Policy Objective 61

“Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, green infrastructure planning and innovative design solutions” (Draft NPF p. 120).

<sup>1</sup> Communities and Local Government (UK) (2012) National Planning Policy Framework.

### 4.3 Tiered Zoning and Prioritisation of Development Lands

As mentioned above, Cairn has reservations with regard to the newly proposed 'Tiered' approach to land use zoning and 'Prioritisation' of development lands. There is little clarity in the NPF with regard to the types of zoning that these approaches will be applied to, but it is assumed that they will relate to residential lands only. Appended methodologies outline these new approaches, while National Policy Objectives 67 and 68, make provision for them:

#### National Policy Objective 67

"Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is available for development, ii) zoned land that requires further specified investment in basic infrastructural services for development to be realised and iii) zoned land unlikely to be serviced within the life of the relevant plan.

When considering zoning land for development purposes that requires further investment in basic infrastructural services, planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and identify the responsible delivery agency(ies);

When considering zoning land for development purposes that is unlikely to be serviced within the life of the relevant plan, planning authorities will review the status of such lands" (Draft NPF p. 128).

#### National Policy Objective 68

"When zoning land for development, planning authorities will apply a specified standardised approach in establishing an order of priority for development of land taking account of proper

planning and sustainable development, and in the case of adjoining interdependent landholdings, evidence of landholder commitment to necessary cooperation to release lands for development.

Planning authorities will use compulsory purchase powers to facilitate the delivery of enabling infrastructure to prioritised zoned lands, to accommodate planned growth.

Infrastructure delivery agencies will focus on the timely delivery of enabling infrastructure to priority zoned lands in order to deliver planned growth and development" (Draft NPF p. 129).

Of importance to the tiered zoning of land is that lands designated as 2 and 3 are not unnecessarily prejudiced, as might happen, particularly to Tier 2. Tier 2 zoned lands should be deemed as being free and acceptable for development and the local authority should make every effort to support same. Similarly, if a developer, either independently or in conjunction with a local authority, can demonstrate their ability to service lands prescribed with Tier 3 zoning during the lifetime of the existing plan then the local authority should be amenable to allowing their development.

This is where the prioritisation of lands will be important as it will consider more than just serviceability. However, the process is very prescriptive and the blunt application of a 33%-33%-33% split (first half of requirement during the lifetime of a plan, plus second half of requirement during lifetime of a plan, plus c. 50% headroom) may prejudice some lands. For example, it is unclear if Priority 2 lands will not be permissible for development until all Priority 1 lands are developed. Nonetheless, Cairn believes that the process of prioritising lands will be difficult. It will need to account for unquantifiable aspects that are not considered as part of the tiered approach, such as land ownership issues, willingness and ability of owners to develop, etc. Again, Cairn wishes to express concern that the prioritisation of lands may prejudice some sites and create uncertainty in relation to the potential of lands to be developed. The designation of lands as Priority 3 may be sufficient enough to deter investors, investment and consequently development. Cairn wishes to assert that any lands that are zoned for development should be fairly treated, assuming the requisite infrastructure and services can be provided. Accordingly, we urge the Government to review the principle of prioritising development lands and accept a single prioritisation zoning standard.

Thorough engagement by the various local authorities will be required to ensure that the tiered zoning and prioritisation of development land approaches are correctly implemented; notably in relation to the latter where individual sites and land parcels have unique histories and characteristics. Consequently, time and resources will need to be extended to local authorities to undertake these exercises and any processes should be transparent and fair to mitigate unfavourable, questionable outcomes.

**The importance of the proposed Housing Need Demand Assessment (HNDA) (National Policy Objective 39) should be used to guide appropriate and sustainable development. Its incorporation into the tiered land and prioritisation of development land processes should be considered as a means to statutorily back the need for an evidence-based approach to development.**

#### 4.4 Investment and Infrastructure

The reality of successfully delivering the NPF is premised on sufficient investment and infrastructure being allocated to Ireland's future development. For example, new infrastructure and capacity enhancements will be vital if densities are to be increased. As the Draft NPF asserts; **"infrastructure provision is both influenced by and influences spatial development. Infrastructure can be provided in areas where demand already exists or is predicted to increase"** (Draft NPF p. 130). Therefore, investment in infrastructure must be made available if National Policy Objective 5 is to be secured; "Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth and investment" (Draft NPF p. 105). Consequently, National Policy Objective 7a to develop a National Smart Growth initiative to support development and leverage investment. Cairn looks forward to reviewing the details of this further in conjunction with the National Investment Plan (NIP).

Cairn wishes to stress the importance of investment in the infrastructure and services that society and the economy require. This investment must be at two levels: locally to secure the servicing and accessibility of sites (which will enable quality residential developments to be brought forward, in existing communities) and regionally/nationally to secure large projects such as public transport, strategic roads, digital connectivity, energy, etc. Importantly, the scales of investment must reflect the potential benefits in terms of populations served, economic gain attained and environmental protection and enhancement - i.e. funding provided must align with strongest returns on investment and efficiencies harnessed. The Dublin Chamber notably illustrates the investment disparities between Luas Cross City and more rural projects such as the New Ross and Enniscorthy bypasses, the latter of which will serve smaller populations<sup>3</sup>. The Draft NPF agrees with this principle; **"the higher the density of the population in an area, the easier it is to spread the fixed costs of an infrastructure project and to ensure that delivery of infrastructure is viable"** (Draft NPF p. 130).

At a local level, initiatives such as the Local Infrastructure Housing Activation Fund (LIHAF) have been beneficial in assisting local developments. Adequate investment in infrastructure will also be vital to guarantee that Tier 2 and 2a lands (should the Government proceed with the tiered approach to land zoning) become serviced during the lifetimes of the relevant plans.

However, it is the larger projects that, while dependent on critical mass to create viability, also facilitate and promote higher densities and sustainable living, commuting and working practices. A perfect example of this is the content of the Greater Dublin Area Transport Strategy 2016-2035. Considerable effort and resources have been expended producing the Strategy and its statutory grounding bestows it with authority and certainty. For the Greater Dublin Area, this is what must be implemented as it has the potential to be the agent to secure the Dublin's, and indeed the Greater Dublin Area's, future growth.

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<sup>3</sup>Dublin Chamber (2017) Submission on Ireland 2040 - National Planning Framework.

The Draft NPF (p. 130) must not just “strongly inform” the forthcoming NIP, it should be used to define it. For the NPF to achieve its objectives and reach its vision it must be bolstered by requisite investment, as well as by political and social will. Of particular importance to Cairn and the wider delivery of housing in Ireland are that the NIP, as informed by the Draft NPF (p. 131), will:

- “Deliver a stable profile of public investment yielding greater certainty to the infrastructure delivery and investment sector”.
- “Address existing critical infrastructure deficits”.
- “Invest to maintain the quality and performance of existing public infrastructure”.

Amongst the foregoing include sufficient funding being made available for water, electricity, gas and broadband services to ensure that bottlenecks to the delivery of housing and economic development are minimised.

#### 4.5 Development Management Standards

Cairn has consistently sought to deliver high-quality housing and in this regard development management standards should not solely be restricted to minimum standards, but must also include and be receptive to creative solutions and quality design and materials.

In some instances, development management standards should allow for flexibility and case-by-case understandings to more cost-effectively deliver affordable housing for society, at higher densities, in optimal locations and to reflect the needs of prospective occupants. Blanket applications of development standards can prejudice some locations, reducing the viability of projects.

Accordingly, Cairn welcomes National Policy Objective 11; **“In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria enabling alternative solutions that seek to achieve well-designed high quality and safe outcomes in order to achieve targeted growth and that protect the environment”** (Draft NPF p. 51).

In many cases, additional investment in infrastructure will reduce the need to apply some standards or at least apply more practical standards to address viability issues without compromising on quality. For example, greater public transport provision in the Greater Dublin Area and Ireland’s other cities will reduce the need for car ownership and warrant higher building heights and urban densities.

While it is accepted that the NPF will be a strategic document, the current Draft NPF fails to consider (and therefore address) the bottlenecks and delays (regularly unnecessary) that beset the planning system. Such delays are costly in terms of time and money and hinder the speedy delivery of additional new homes. Uncertainty and inconsistency also make decision-making processes more difficult. The NPF should recognise these issues and seek to remedy them, albeit leaving the specific detail to be filtered into the RSEs and City/County Development Plans.



**In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria enabling alternative solutions that seek to achieve well-designed high quality and safe outcomes in order to achieve targeted growth and that protect the environment (Draft NPF p. 51).**







# 5 Conclusion

The NPF will give Ireland an opportunity; and this opportunity will be to define its future through sustainable planning and development. It must learn from the outcomes and lesson of the NSS and, given its anticipated statutory grounding, be adhered to create certainty. It is paramount that we plan Ireland's future correctly, now.

Cairn is keen to assert that the Greater Dublin Area must remain prioritised as Ireland's economic driver and largest population centre. While Ireland's other cities and towns need to be developed and promoted, they must not be at the expense of the Greater Dublin Area. Restricting the Region's growth to remain proportionate to that of the regional cities could stymie the economic and social growth of the Greater Dublin Area should they not grow by the targeted 50-60%. This is a primary concern. Investment in Dublin and the wider Greater Dublin Area must be safeguarded to secure infrastructure to make it a greater city region and to support future growth.

The implementation of the NPF and the impact that it will have on the forthcoming RSEs and existing and future Development Plans and Local Area Plans must be carefully considered and undertaken. It is vital that a balance be struck between: increasing urban densities and the application of development management standards, while also seeking to, in the short term, massively improve housing delivery, and sustain this pattern as required by future population growth, and to seek housing quality and urban liveability. In doing so, affordable homes can be delivered to the market. Yet, this is all dependent on the provision of infrastructure and services by Local, Regional and Central Government.

There is no doubt that the Draft NPF is an important and necessary step towards a more unified and coherent plan for the future. However, it must ensure that it supports the creation of that future through funding and political backing.

Cairn hopes that the insights provided in this submission have been beneficial and will be duly considered and reflected in the forthcoming Final NPF. Cairn appreciates the opportunity to have made this submission, and looks forward to reviewing the finalised Framework, associated National Investment Plan and the realisation of related initiatives in the coming months.



## Leading the way.

Quality is at the heart of everything we do at Cairn Homes plc. We choose only the very best locations for our developments, ensuring that residents are surrounded by top-class amenities, facilities and transport links. We then design each development to be the heart of a growing community, both now and for generations to come. We pay close attention to aspects like landscaping, build materials and environmental concerns to ensure our developments fit in with and enhance the location.

When it comes to our homes, only the best will do. We bring together the best craftspeople, the best designers, the best architects and the best builders to bring you quality homes that stand the test of time. Special consideration is given to environmental concerns; we want every home to be a pleasure to live in, cheap to run and kind on our world's resources.

As a public limited company, we are transparent in everything we do, promoting confidence in our activities both at an investment and at a consumer level. Our approach engenders the trust and collaboration of planners, local authorities, regulators and other important stakeholders in the industry. We believe that our existing and future plans for developments are making a meaningful difference to the shortage of new homes in Ireland.