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31st March 2017

NPF Submissions,

Forward Planning Section,
Department of Housing, Planning,
Community and Local Government,
Custom House,
Dublin D01 W6X0

Dear Sir/Madam,

Submission on the Preparation of Ireland 2040 Our Plan – National Planning Framework

Introduction

We wish to make a submission on the preparation of Ireland 2040 Our Plan – National Planning Framework. As a document which will be put on a statutory footing and form the capstone of a new hierarchy of Regional, County and Local Plans, it is important that this opportunity is taken to positively influence the spatial and economic development of the country going forward.

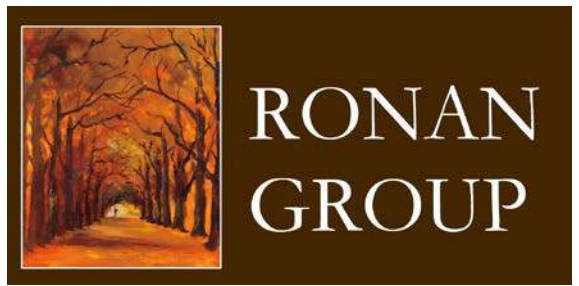
Dart Underground

While page 47 of the Issues and Choices paper acknowledges the fact that the National Planning Framework will not dictate macroeconomic decision making with regard to capital expenditure, the paper acknowledges that investment decisions between specific projects will *'be considered against the background of the NPF'*.

In this context, it is submitted that the key piece of infrastructure for the Dublin Region which must be highlighted in the NPF is the DART Underground (in order to create the right 'background' against which future expenditure decisions will be made).

It is considered that DART Underground is the key, *'nationally important transport infrastructure'* project which will allow Dublin to compete on a European and global stage where locational decisions by business and employers are made based on hard factors – including the availability of sufficient transport infrastructure and housing for employees- as well as soft factors such as levels of education. The need to enhance the competitiveness of Dublin via the improvement of its city centre public transport network is also all the more urgent with the advent of Britain's exit from the EU.

The DART Underground is therefore seen to be a nationally strategic infrastructure priority which has the potential for enormous returns in terms of employment creation, sustainable transport use and economic prosperity for the Dublin region. The fostering of critical mass and increased intensity in urban areas highlighted in the issues and choices paper are worthwhile objectives in the pursuit of a more sustainable modal split and lower carbon footprints amongst city dwellers, however for this land use / transport policy direction to bear fruit, concurrent investment in high quality public transport infrastructure is needed.



It is submitted that Dart Underground is just such an investment which would bring returns both economically and in terms of sustainability.

Increasing Densities in Urban Areas and around Transport Nodes

The promotion of density and critical mass around transport nodes must be a key objective in the National Planning Framework. It is considered that a direct link should be made going forward between the accessibility profile of sites and their development potential, with higher densities encouraged of residential and employment uses provided for in locations adjacent to public transport.

A renewed effort must be made to influence population distribution with cognisance of transport and mobility in order to counter the outward sprawl of cities identified in the Issues and Choices Document and ensure reduced dependence on the private motor vehicle while encouraging public transport use and other such environmentally sustainable modes of transport.

While previously published planning policy documents, including the NSS, RPGs and Development Plans highlight the need for critical mass in order to support transport infrastructure, it is submitted that not enough has been done to influence development patterns densities in a meaningful way in practice.

It is submitted that strategic locations, and in particular the Docklands in Dublin presents a key opportunity for development at much higher densities than currently permitted, while also ensuring the amenity of future residents and without negatively impacting on surrounding areas. It is submitted that the NPF should further highlight the need to consolidate population and increase densities around transport nodes, this may be achieved through increases in allowable building heights, changes to parking requirements.

For example, in Dublin Docklands, heights and densities are restricted by the very conservative height limits prescribed by the North Lotts and Grand Canal Docks Planning Scheme, which generally only allows for residential developments of 6-7 storeys in height. The maximum heights for apartment development in the Docklands are lower than the rest of the city centre notwithstanding that the Docklands is identified as the principle location for high buildings over 50 metres in the City Development Plan. This is directly contrary to all objectives for the sustainable development of housing in the Dublin Region.

Promoting Residential Development in Inner City Areas

Following on from the above, it is considered that immediate steps should be taken to address the cost imbalance between greenfield, outer suburban or rural housing development and residential development on brownfield, inner urban sites. In any case, without positive measures to incentivise inner urban development, the easier and less costly option of greenfield sprawl will remain the dominant trend.

The Department of Housing, Planning, Community and Local Government's Monthly Housing Activity Report, February 2017, reveals that 31 percent of all commencement notices for residential units in the 12 months to the end of January 2017 were for one off dwellings, highlighting the continued proliferation of rural housing development in a manner which cannot purport to be sustainable.

On page 25 of the Issues and Choices Paper, the question is raised; *"How might we develop an urban policy that distinguishes between development within the existing built up areas of cities and towns and greenfield development sites?"*

The key differentiator which encourages development on greenfield sites over and above development in urban areas is the cost differential in terms of site assembly, site preparation, construction costs, development levies (including levies under Section 49 of the Act which relate to public transport projects). These additional costs all constitute strong push factors which discourage development in inner urban areas, particularly in an industry wherein final yields are strongly influenced by build costs and levies.

In order to promote infill development in inner urban areas in a manner which distinguishes between inner urban and greenfield outer urban and rural development, it is submitted that an appropriate policy response would be to reduce VAT on residential developments in city centre locations for a set time – i.e. 3 years for



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example. This pilot period could then be extended if it was proven to yield a shift in development patterns away from urban expansion and sprawl and towards urban consolidation and a compact urban form.

The stimulation of urban infill residential development through a VAT reduction incentive would have the medium-term effect of increasing supply in the areas of the country under the greatest pressure and housing need in a highly sustainable manner while counteracting outward sprawl and meeting housing needs.

Prioritising urban development via VAT reduction will furthermore lead to a more sustainable and environmentally friendly development pattern, particularly when combined with appropriate investment in high quality public transport infrastructure as set out above. Plan-led urban consolidation and intensification is more likely to be a success if complementary incentives are introduced which will play a role in influencing the viability of infill developments and reducing pressure on greenfield and rural settings which have heretofore accommodated unsustainable development.

Offshore Wind Energy

The Issues and Choices Paper highlights the importance of the interaction between marine and land based spatial planning. One of the key questions in this section asks what the future might be of Ireland's coastline, islands and offshore.

It is submitted that one of the key marine based industries going forward will be that of offshore wind energy production. The National Planning Framework must deal with offshore renewable energy and provide a framework for its development over the lifetime of the plan. This would provide an element of certainty for potential investors that offshore wind energy is on the planning agenda and might hasten the transition towards offshore wind as an alternative to fossil fuels.

Ireland is uniquely strategically located to capitalise on investment in offshore renewables due to its geographic location. An investment at this stage in planning for such development would potentially pay dividends and ensure that the roll-out of this green industry takes place in a plan-led manner.

There is a huge opportunity for Ireland to exploit this unique resource which will attract very substantial capital investment from world-wide players, create new industry (on a par with the agricultural industry in scale) and create thousands of jobs – both directly and in spin-off sectors. This opportunity should be grasped now.

Conclusion

The above submissions are made in respect of the preparation of the National Planning Framework 2040.

I trust that these submissions will be taken into consideration in the formulation of the National Planning Framework.

Yours sincerely,

Ronan Group Real Estate