

CONSTRUCTION INDUSTRY FEDERATION

CORK BRANCH SOUTHERN REGION

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The Director
Southern Assembly
Assembly House
Waterford
X91 F8PC

11 October 2019

Re: Submission to Proposed Material Amendments to the Draft Regional Spatial & Economic Strategy for the Southern Region

Dear Sir / Madam,

As Regional Director of the Construction Industry Federation (CIF), I am delighted to make this submission to the proposed material amendments of the draft Regional Spatial and Economic Strategy (RSES) for the Southern Region on behalf of the Cork Branch CIF.

The Cork Branch CIF submission to the draft RSES of 5 March 2019 highlighted several concerns in relation to the following issues:

- Infrastructure Priorities;
- Compact Growth;
- Zoning;
- Strategic Land Reserves; and
- Implementation.

We are pleased that some of our concerns have been addressed within the proposed material amendments, specifically additional reference to Strategic Land Reserves and clearer statements on implementation process, to provide robust structures for the delivery of the strategy and the MASPs and consultation with relevant stakeholders. We welcome these commitments and again express our views that, within the implementation structure, there is a need to provide a summary list of all infrastructure requirements by area, with an estimate capital cost, timeline for delivery, source of funding and estimate of how much employment and residential growth potential could be facilitated by the infrastructure investment.

However, our more substantive concerns in relation to compact growth proposals have not been addressed. Further, there are amendments proposed which undermine the strategic vision of the RSES and contradict the National Planning Framework, and the proposed modification in relation to the Land Development Agency requires further clarification / consideration. This submission is structured to address these issues in turn, as follows:

1. Compact Growth
2. Strategic Vision
3. Land Development Agency



1 Compact Growth

In our submission to the draft RSES we laid out the CIF's concerns regarding implementation of objectives to achieve a target of a minimum 50% of all new homes within the existing built up footprint in Cork and 30% in other metropolitan settlements; and to promote the "appropriate level of density and scale of development relative to the settlement scale and location..." (p. 30 draft RSES).

We noted that it was inappropriate to set ambitious targets without evidence of the local demographic need for housing types in suburban areas and towns, and that it was foolhardy to base a policy for compact growth on infill and brownfield sites, without a clear roadmap which establishes:

- How much land is available and potential yield on these lands; and
- How such sites can be made viable.

Taking account of these concerns, we requested that a transitional target be developed which would:

- Allow a database on infill / brownfield sites to be established;
- Allow viability initiatives to be progressed; and
- Allow implementation to be evaluated before the ambitious targets of 50% and 30% infill / brownfield development were set as prescriptive targets.

We are alarmed that the proposed amendments have not taken these concerns on board and instead material amendment 27 proposes to revise RPO 32 requiring:

(b) Development Plans shall state a minimum requirement to deliver at least half (50%) of all new homes that are targeted in the region's three Cities and suburbs of Cork, Limerick and Waterford within their existing built up footprints (brownfield and greenfield) in accordance with NPF National Policy Objective 3b.

(c) Development Plans shall state that a minimum requirement to deliver at least 30% of all new homes that are targeted in settlements other than the cities and suburbs within their existing built-up footprints (brownfield and greenfield) in accordance with NPF National Policy Objective 3c.

The proposed amendment to RPO 32 does not allow for transitional arrangements, does not allow for any qualitative assessment related to local demographic analysis; nor does it allow for any flexibility to respond at a local level to potential higher population growth rates than projected by the National Planning Framework (NPF).

Demographic growth over the last two years has been at the upper level of the population projections provided within the NPF Implementation Roadmap, on which the draft RSES is based. The NPF Roadmap projects growth averaging around 47,450 people each year to 2040. The transitional arrangements envisage a higher growth in the years 2016 to 2026, allowing a range from 52,860 to 66,460 people per year.

The Population and Migration Estimates for the year April 2018 to April 2019 (published in August 2019) indicate that, for the second consecutive year, population growth was around 64,500 people. While this is within the range of the NPF's transitional growth provisions, it is very much at the upper end. Experience has proven that strong population growth, coupled with constrained land supply will lead to rising land prices. Given the continued restrictions on mortgage lending and development finance these conditions are likely to lead to a lack of viability for the housebuilding market, further constraining housing supply.

The Cork Branch CIF recognise that RSES is based on the population projections provided by the NPF and does not have flexibility to revise these populations at a regional level. However, the RSES must



allow for flexibility of response at a local level. The statutory planning process is, by its nature, a lengthy one. This can result in planning policies being out of sync with the needs at a local level and unable to respond to macro impacts, such as a continued strong population growth. It is therefore necessary to allow flexibility in the development plan stage, to respond to growth pressures that might outstrip national level projections.

As referenced in our original submission, we also noted the draft RSES included a statement that:

*“...the level of change required by the NPF cannot be implemented immediately. It will take several RSES / Development Plan cycles to change long terms patterns of development... and to implement the long-term change required by the NPF.”
(p.8)*

The proposed amendment to RPO 32, requiring all development plans to apply minimum targets of 50% and 30% for compact growth policies, without any provision for transitional arrangements contradicts this statement. It will require development plans to implement provisions for 50% and 30% of growth within existing footprints, and does not allow the flexibility for additional lands to be zoned should growth rates continue to be strong, and / or lands within the existing footprint of settlements are not brought forward for development, or prove to be unviable.

As noted in our original submission, the CIF support policy objectives to promote compact growth, but would urge the RSES to set a clear direction in recognising the distinctiveness of the Southern region in terms of its demographic profile with a higher proportion of larger household sizes; the importance of viability in achieving growth targets; and how ‘transitional change’ is to be managed. We also reiterate our submission that it is imperative that adequate lands remain zoned to ensure a sufficient supply of affordable lands are available to the market, and that the RSES should be explicit that there is no requirement for a policy of de-zoning land to promote compact growth.

We therefore request the following revisions to proposed amendment 27:

(b) Development Plans shall ~~state~~ set out a transitional ‘road map’ to require a minimum requirement to deliver at least half (50%) of all new homes that are targeted in the region’s three Cities and suburbs of Cork, Limerick and Waterford within their existing built up footprints (brownfield and greenfield) in accordance with NPF National Policy Objective 3b. The road map shall be based on evidence of the availability and viability of lands within existing built up footprints, demographic analysis and the economic context. Development Plans shall monitor implementation of these targets to ensure that there no shortage of land availability.

(c) Development Plans shall ~~state~~ set out a road map to require that a minimum requirement to deliver at least 30% of all new homes that are targeted in settlements other than the cities and suburbs within their existing built-up footprints (brownfield and greenfield) in accordance with NPF National Policy Objective 3c. The road map shall be based on evidence of the availability and viability of lands within existing built up footprints, demographic analysis and the economic context. Development Plans shall monitor implementation of these targets to ensure that there no shortage of land availability.



2 Strategic Vision

A strategic vision of the NPF is to

“Enable the four cities to be regional drivers and to lead in partnership with each other and as partners in regional / inter-regional networks as viable alternatives to Dublin.”

We welcome the proposed amendment 4 to insert a new RPO promoting collaboration between Metropolitan Areas within the southern region. However, we note that the proposed amendment includes as a final sentence that *“Central to the success of this collaborative approach is the early delivery of the M24”*.

We note that the M24 is not specifically mentioned in the National Planning Framework or the National Development Plan and while we welcome all investment in infrastructure, we strongly object to the inclusion of this sentence in the proposed amendment 4. Such a strong statement in the Regional Spatial and Economic Strategy that only one road project is named as being the key to greater collaboration could be deemed prejudicial to the current route selection process for the M20. It is also counter-productive to specify one individual road project as being central to collaboration. This is particularly the case when the M24 project is not an objective of the NPF or the National Development Plan (NDP) and has the potential to undermine the importance of the M20 and N25 (Euroroute E30) in progressing the collaborative approach between Cork, Waterford and Limerick. It must also be pointed out the importance of the N25/Euroroute E30 in the context of European strategic planning and the importance of access to the nations Ports in Rosslare, Waterford and Cork that are closer to continental Europe in the context of Brexit.

We submit that proposed amendment 4 should be revised to delete the final sentence or to include the M20 and N25:

It is an objective to establish a collaborative approach between Metropolitan Areas of Cork, Limerick / Shannon, and Waterford (together with Galway): that they lead in partnership with each other to harness their combined potential as viable alternatives to Dublin The Southern Region’s Metropolitan Areas should be prioritised for focused and long-term investment as the region’s most significant economic engines to ensure regional parity (together with Galway) and to act as an effective counter-balance to the unbalanced growth of Dublin. ~~Central to the success of this collaborative approach is the early delivery of the M24.~~

3 Land Development Agency

We note that proposed amendment 28 expands the text in respect of the role of the Land Development Agency, noting their role to open-up key sites. The Cork Branch CIF welcome this additional text but are concerned that the final sentence in relation to environmental criteria could be interpreted as a Land Development Agency policy not to be involved in the selection of sites where there are environmental issues, such as land contamination. Given the need to unlock brownfield sites in urban areas, it is submitted that this text should be revised to focus on delivering appropriate mitigation measures on sites which may have environmental sensitivities. We therefore submit that material amendment 28 should be revised as follows:

It is an objective to support the role collaboration and delivery of actions in the Regional through initiatives of the Land Development Agency which include co-ordinating appropriate State lands for regeneration and development, opening up key sites which are not being used effectively for housing delivery; and driving



strategic land assembly, working with both public and private sector land owners. The co-ordination and selection of sites should be based on a process that examines environmental criteria and sets out appropriate environmental mitigation measures to bring sites forward for development (see also RPO 1).

Summary

The CIF welcome the opportunity to make this submission to the proposed amendments to the draft RSES for the Southern Region and submit the following points:

- The Cork Branch CIF welcome proposed material amendments in relation to providing additional reference to Strategic Land Reserves and clearer statements on implementation process, but are concerned that our more substantive concerns in relation to compact growth have not been addressed.
- We request that revisions are made to proposed amendment 27 to:
 - Highlight the need to provide for transitional arrangements, or a road map, to prescriptive targets in delivering development within the footprint of existing urban areas;
 - Allow for the development of compact growth targets that are evidenced based and subject to review to respond to macro-economic and demographic context.
 - Ensure implementation is monitored and targets review to avoid any shortage in land supply.
- We support text in proposed amendment 4 to promote a collaborative approach between Metropolitan Areas, but request that reference to “...the early delivery of the M24” is deleted from this objective, as it is counter-productive to specify one individual road project in a policy focused on collaboration between the Metropolitan areas. Alternatively this section should also include the N25 (EuroRoute E30) and the M20.
- We welcome additional text in proposed amendment 28 on the role of the Land Development Agency, but request that this text is amended to focus on delivering appropriate mitigation measures on sites which may have environmental sensitivities.

Thank you for the opportunity to comment on the draft RSES and for taking the time to consider this submission.

Yours faithfully



Conor O'Connell
Regional Director, Southern Region
Construction Industry Federation

