



NPF Submissions
Forward Planning Section
Department of Housing, Planning, Community and Local Government
Custom House
Dublin 1 W6X0

Ireland 2040: National Planning Framework 2040

To whom it may concern,

I refer to the position paper *Issues and Choices Ireland 2040: Our Plan, the National Planning Framework* (NPF) issued by the Minister for Housing, Planning, Community and Local Government in February. The City Council welcomes the opportunity to participate in and contribute towards setting the strategic planning context for the nation over the coming decades.

As requested by the Minister, the NPF Issues Paper was presented to both the Planning and Property Development Strategic Policy Committee and the Full City Council for consideration. The views of both the SPC and the City Council are incorporated in this submission.

The provision of a strategic, statutory national planning framework that will inform strategic spatial and investment decisions is welcomed by the City Council. There is a clear need for strong and clear strategic guidance in relation to the future development of the country and it is considered that the National Planning Framework has the potential to support the further successful development of the Dublin City region and, consequently the economic and social future of the nation.

Notwithstanding the significant recent economic downturn, there have been considerable achievements for the city in recent times, some of which continued to be implemented despite the recession. With the aid of the strong economy up to 2008, new urban quarters were created in Heuston and the Docklands, extending the City Core to the east and west. A new Strategic Development Zone (SDZ) was designated for the Grand Canal Dock and North Lotts, which has the potential to provide employment for up to 20,000 people and 2,600 new homes. A further SDZ scheme is under preparation for Poolbeg West to provide approximately 3,000 much needed new homes in the city close to major employment centres. In a similar vein, an SDZ was designated at Grangegorman for the creation of a new third level educational and health campus, as part of the regeneration of the North Inner City. The new National Children's Hospital under way for the Saint James Hospital Campus, which will in turn greatly enhance the rejuvenation of the South West of the inner city.

Extensive new neighbourhoods are being created at Pelletstown, Clongriffin – Belmayne, and Ballymun, with the support of an updated suite of Local Area Plans.

On the public transportation front, the new Luas Cross City line is progressing, as are the premier cycle tracks, whilst plans to enhance the city centre public realm are advancing.

Whilst much has been delivered, it is also acknowledged that the legacy of the recession, particularly in the area of housing construction, may take time to turn around. The proposals of the Government-backed Housing Task Force to expedite the supply of the right housing in the right place is being actively pursued by the City Council.

The Vacant site levy, in conjunction with an Active Land Management Unit within the Council will ensure that underutilised land is identified and, where barriers exist that can be addressed, will be aided in their redevelopment.

As stated in the Dublin Economic Monitor:

“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”¹.

Having reviewed the NPF issues paper, the City Council has the following comments to make across 6 themes, which are interlinked.

Role of the Dublin City region

Although the Issues Paper identifies the importance of Dublin to the State, it is considered that the key strategic importance of supporting the continued success and development of the city region does not appear to be adequately translated through the document.

Williams et al, in a 2012 report on Dublin’s role in the national economy state:

“With regard to regional income contribution and the distribution of resources Morgenroth (2010) demonstrated that the Dublin and South-West Regions are substantial net contributors in terms of resource generation, tax take and subsequent redistribution. The Irish fiscal system and central government acts to reduce regional disparities transferring resources from income surplus regions to regions requiring income transfer. Based on the most recent published evidence this research found that Dublin and the South-West contributed just over €2000 per person in 2004 while the Midlands received €3,000. Just over €3 billion was transferred from the ‘net surplus regions’ Dublin, South-West and Mid-West to the other regions in 2004”².

¹ Dublin Economic Monitor, Spring 2015

² Williams, B, Foley, W, Cudden, J & Shahumyan, H, 2012, *Dublin's Role in the Irish and Global Economy 2012: Working Paper Report 4* Prepared for Dublin Regional Authority

It is clear that the Dublin city region is a net contributor in economic terms to the nation and it is vitally important that this role is supported and not restricted or hampered. There appears to be a view in the Issues Paper that the success of the Dublin City region, and its portion of national population and GDP, is of concern in relation to the rest of the county and that this needs to be addressed through more regional development. The City Council considers that the country as a whole would benefit from improved regional development but that this should not be at the expense of development in Dublin. The success of the Dublin city region is not based merely on scale but rather is due to a subtle combination of, inter alia, accessibility factors, critical mass, provision of a skilled labour force, social and community infrastructure and housing provision. The NPF should ensure that strategic goals being proposed to 2040 ensure the continuation of, and consolidation and improvement of, such factors in order to copper fasten the city region's, and Ireland's, ability to compete on an international stage. It is therefore of serious concern that section 4.1.5 states "... *the objective of achieving more effective regional development elsewhere in Ireland makes it difficult to prioritise the needs of the Capital and our other cities*"

The issues paper further states in section 4.1.6 that "*Dublin's success as a city-region is a double edged sword. It has enabled Ireland to compete in an international context but such success has also given rise to pressures in areas such as housing, transport and infrastructural requirements, which affect competitiveness*"

Rather than the success of the city region of Dublin resulting in problems with pressures relating to housing, transport and infrastructural requirements as seems to be implied by this statement, it is the underfunding of infrastructure and public transport and over-reliance on the private sector for delivery of housing that has resulted in the significant pressures facing the Dublin city region. It is acknowledged that undersupply of housing and inefficient transport networks in the Dublin city region are of concern in relation to the continued competitiveness of the City region. This has been picked up in international discussions as demonstrated by an article on the provision of housing in Ireland published in the Financial Times, identifying housing shortage as a threat to Ireland's recovering economy³. The NPF is ideally placed to address such underfunding by ensuring that there is an alignment between core strategic growth areas and the necessary physical and social infrastructure to ensure those places become successful neighbourhoods from the outset.

It is crucial that the NPF ensures that Dublin, as a capital city and city region, is planned for in such a way that it can continue to play its vital international role. The Dublin city region is not large compared to other successful city regions in Europe. Jobs lost to Dublin are likely to go to other European city regions. Ireland needs a city metropolitan area with the critical mass to act competitively with cities internationally while being complemented by the next tier cities and their regions. The future growth of Dublin must not be allowed to become a double-edged sword, whereby success will result in overheating pressures which will affect competitiveness. Rather, it is vital that the NPF provides the framework for addressing these pressures, for the benefit of the whole island, rather than restricting Dublin.

³ Financial Times, June 21 2016 <https://www.ft.com/content/ba41c19e-3478-11e6-ad39-3fee5ffe5b5b>

The perceived dominance of Dublin in a national context is compared with Copenhagen, Auckland, Glasgow and Helsinki in the Issues Paper and indicated as being of concern due to the lack of comparable lower tier cities.

However, it is considered that the pre-eminence of Dublin in a national context is related to a legacy of the traditional, and specific, Irish settlement pattern and to the extremely high performance of the city region in recent decades. Such performance is over and above what might be expected of a relatively small city region by world standards (Dublin city being ranked only 106th largest city in Europe and 26th largest capital city⁴). The Dublin Economic Monitor identifies how Dublin ranks on international benchmarks and states:

“The FDI Global Cities of the Future ranking for 2016/2017 lists Dublin as the third best city in the world for attracting FDI

Dublin city also improved its ranking in The Reputation Agency’s City Reprtrak Study, which focuses on a city’s reputation as a destination to visit, work, live and invest. Dublin rose two places to its highest ever ranking of 20th worldwide

The Capital ranked highly in the first Global Talent Competitiveness Index which assesses cities on their ability to grow, attract and retain talent. Dublin was ranked as the tenth best city from a group of 46 leading international cities worldwide

Dublin rated highly in both the 2016 CBRE European Tech Rankings (6th) and the 2016 European Digital City Index (8th).

Dublin also retained its position as one of Europe’s most attractive cities for property development and investment in the 2017 PwC Emerging Trends in Real Estate report. Joanne Kelly of PwC noted:

“With an economy performing well over the average EU GDP level, a young fast-growing population, the most business friendly tax regime in Europe and many multinationals based here, Dublin remains a highly regarded location.”⁵

Williams et al (2012) studied the role of Dublin in the Irish and global economy and state:

“Capital city regions in small and medium sized European states such as Ireland, Denmark and Netherlands often play a dominant role as economic drivers of their respective national economies. ...Dublin and its functional area in this regard is similar to other global cities and its primacy and contribution to the national economy is critical with the OECD Stat Extract indicating that the Dublin city region alone¹⁴ contributes 40 per cent of national GDP (OECD, 2012).

Debate as to their future growth and role often includes the need for balanced regional development. In recent decades this debate internationally has moved away from a deliberate deflection of development from urban growth areas to exploring the

⁴ www.citymayors.com, www.nationsonline.org

⁵ Dublin Economic Monitor, Issue 8, January 2017

maximization of their benefits nationally. The alternative of capitalising on the international gateway status of such regions while enhancing the functional specializations and strengths of complementary urban regions is now the norm.

*The consequences of not using any States primary international gateway to full advantage (whether it be Dublin, Copenhagen, the Randstad or other similar regions) would be a potential reduction in national income and benefits. Enterprise and economic development activities which are increasingly internationally mobile may be simply deflected out of the region to areas with weaker infrastructure assets or out of state to international competing urban regions”.*⁶

Ireland is viewed as an extremely competitive economy internationally, being ranked 7th in the world in the 2016 IMD World Competitiveness Index⁷. It is therefore considered that the key strategic role that the Dublin city region plays, and will need to continue to play over the next 20 years if Ireland is to be a successful place to live and work into the future, needs to be explicitly addressed in the NPF in a much more detailed and comprehensive manner than would appear to be indicated from the discussion in the Issues Paper.

Strategic Infrastructure Alignment

It is considered that significant emphasis needs to be placed on the issue of increased investment in public transport and other infrastructure such as water and wastewater, together with social infrastructure such as educational and community facilities. The city region is ideally placed to offer significant economic, social, climate change and planning gains in relation to such investment by virtue of the critical mass of existing population, employment and social & community functions that are located within it.

The European Commission report on Ireland notes that investment in transport and housing infrastructure is a key challenge facing Ireland, stating:

“Addressing the shortcomings in transport infrastructure and spatial planning is a growing challenge. To address this growing problem, the Irish authorities face a quadruple challenge: delivering additional transport capacity, finding the right balance between public and private transport, improving the efficiency of transport corridors by means of careful spatial planning, and limiting carbon emissions from transport. Moreover, main urban areas also face large housing supply shortages (Section 4.5.1). The timely and targeted expansion of rail and road networks is crucial to allow for the development of housing projects of sufficient scale. In turn, the strategic positioning of those projects close to public transport corridors again highlights the important role of spatial planning.”

It further states:

“Seven years of sharply reduced government investment have taken a toll on the quality and adequacy of infrastructure. General government spending on infrastructure averaged

⁶ Williams et al (2012), *ibid*

⁷ <http://www.imd.org/uupload/imd.website/wcc/scoreboard.pdf>

EUR 3.8 billion in 2013-2015. However, one can estimate that the annual depreciation of the government capital stock amounts to about EUR 3.0 billion which, at current levels of investment, leaves little room for additions or improvements to infrastructure once maintenance costs are factored in. As a result, pressure points have emerged in a number of areas, also as a result of the resumption of growth. In particular, housing., water services and public transport are facing interconnected challenges.”⁸

It is important that the NPF provides for the alignment and timely provision of critical infrastructure, integrated with planned housing settlement and employment patterns. For Dublin, this means more certainty in relation to public and private investment, particularly in relation to clean water supply and a sustainable public transport network, including rail connectivity with the national airport. As such, future strategic growth areas must be integrated with a robust capital investment programme for infrastructure up to 2040.

It should be noted that the Infrastructure and Capital Investment Programme 2016-2021 produced by the Department of Public Expenditure and Reform sets out the objectives of State investment in infrastructure, stating:

“High-quality infrastructure is an important element of a modern society and economy. It strengthens economic growth through enhancing efficiency, productivity and competitiveness. Investment in infrastructure also underpins social cohesion through providing the facilities for vital services to people in the form of schools, public transport, health care and housing. This Capital Plan reflects the Government’s commitment to supporting strong and sustainable economic growth and raising welfare and living standards for all.”⁹

The delivery of key infrastructure projects for the Dublin city region would tally with the strategic objective as set out.

The Need for Sustainable Urban Density

It is important that the National Planning Framework recognises that the physical consolidation of Dublin, supported by effective land-use policies for the urban area itself, is an essential requirement for a competitive Dublin, and that quality higher density is also required along strategic public transport corridors. The CABE Report (Better Neighbourhoods 2005) indicates, for example, that 60 uph is the minimum density needed for a viable tram service.

The NPF has an important role in ensuring that land-use and transport are critical inter-linked policy tools that need to work together to better realise economic success, environmental protection and quality of life. Good quality, higher density developments such as those at Heuston South Quarter and parts of the Docklands can make a positive contribution to the evolving urban form and structure of the city. If Dublin is to command its due share of scarce public investment then the NPF should have a role in ensuring that higher density development is facilitated.

⁸ European Commission, 2017, *COMMISSION STAFF WORKING DOCUMENT Country Report Ireland*

⁹ Department of Public Expenditure and Reform, 2015, *Building on Recovery: Infrastructure and Capital Investment 2016-2021*

The NPF should also give guidance in relation to appropriate scale and height in metropolitan locations, rather than allowing for an over prescriptive height cap in Development Plans.

This approach would amplify Guidelines for Planning Authorities on Sustainable Urban Development (Cities, Towns and Villages), (Department of Environment, Heritage and Local Government, 2009), and its companion document, Urban Design Manual: A Best Practice Guide.

Housing and place-making

The NPF should place a real emphasis on the value of cities as places to live, in order to make best use of urban land, reduce urban sprawl (and the national carbon footprint), while optimising the use of existing physical and social infrastructure. It is important that the NPF promotes quality higher densities in support of this approach. All new housing areas must be supported by the timely provision of community, healthcare and educational facilities. It is considered that the NPF should have an economic dimension to ensure that the 4,200 – 7,000 homes per annum which Dublin needs, including apartment living, are provided at the right time and in the right place.

The issue of affordability of housing, although primarily relating to economic factors, could also be addressed by the NPF as the issue of affordability of housing has implications for social mix, commuting distances and place-making.

The general cost of accommodation also has a significant impact on the competitiveness of Ireland in relation to fostering, attracting and keeping employment, particularly in relation to globalised FDI for which Ireland needs to compete beyond its borders. The EC report on Ireland states:

Upward cost pressures are an emerging challenge for Ireland. A detailed analysis by the National Competitiveness Council (2016) concludes that 'business costs are high and rising slowly' and consumer prices are more than 20 % above the euro area average. Of particular concern are services costs, which are increasing rapidly compared to the euro area average. The rising cost of accommodation (Section 4.5.1) exerts upward pressure on wages, which are the largest cost for businesses in the services sector.¹⁰

In a further development of the theme of place-making, the issue of urbanism and its ability to deliver strong place and identity should be addressed in the NPF, notwithstanding that the detailed principles of urbanism are suited to the lower levels in the planning hierarchy.

Addressing climate change

The EC country report on Ireland states:

"Transport and agriculture are the main drivers of increased greenhouse emissions. The Irish authorities expect transport emissions, representing about 20% of total emissions, to increase by 11% between 2015 and 2020.

¹⁰ European Commission, 2017, ibid

*This increase in transport emissions is largely due to the shortage of mass transit facilities around Dublin — which underlines the importance of additional investments in public transport and spatial planning.*¹¹

The NPF must put in place the framework for making the transition at national level to a low carbon and climate resilient society, and thereby providing greater certainty regarding the type and scale of renewable infrastructure to be provided. The emphasis in the issues paper on the relationship between good spatial planning and healthier lifestyle is welcome, but this needs to be translated into investment in cycling, walking and a high quality, safe public domain.

It is also considered that the provision of adequate transport, energy, social & community and waste infrastructure will enable the further consolidation of the Dublin city region and will help to address climate change issues through the reduction in emissions from private transport and energy distribution.

High-level implementation

Dublin City Council welcomes the recognition that the NPF must be implemented in an entirely different way from the former NSS. It is noted that the Issues Paper states that the NPF will be a strategic document, approved by the Oireachtas, and will be backed by all Government Departments and Agencies. As outlined above, the NPF as a strategic spatial document must be underpinned by an economic dimension, demonstrating the need for an integrated, long-term capital investment programme to provide for the strategic infrastructure which supports sustainable urban growth in Dublin and the city region.

Conclusion

The City Council welcomes the preparation of the National Planning Framework and considers that it has the potential to provide certainty in relation to the future development of the country in a sustainable manner that makes best use of Ireland's natural and social resources to the benefit of future generations. Having reviewed the Issues Paper, it is considered that the fundamental importance of the Dublin city region to the country as a whole may not be adequately understood, addressed and incorporated into the NPF's fundamental structure. It is surprising that only one section of one chapter of a seven chapter document is dedicated to Dublin.

It is hoped that this submission clearly outlines the key strategic importance of the Dublin city region for the national and international ambitions and obligations of the State. The existing city region must be supported, nourished and underpinned by the strategic framework of the NPF, in association with the sustainable development of the other regions in the country.

As the issues paper correctly identifies "If Dublin is underperforming, Ireland is underperforming. Should the Dublin City-Region suffer a loss of competitiveness and become a less attractive place in which to invest as a result of housing and infrastructural bottlenecks, investment and influence will inevitably be attracted to other similar city-regions in Europe or elsewhere".

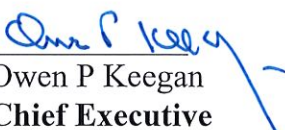
¹¹ ¹¹ European Commission, 2017, ibid

The success of the city region must not be constrained by any policies or objectives in the NPF that identify the continued success of the city region as something with which to be concerned. Rather, the NPF should ensure that the strategic infrastructural requirements of the city region for its continued sustainable development and growth are properly addressed and included in the NPF. Thus, issues relating to transport, energy, water, waste, housing etc. for the city region should be incorporated into the NPF.

It is considered that a successful and vibrant Dublin city region is essential for the future wellbeing of the State and aligns with the Minister's stated aim that *"If we want our country to be the best it can be, we must ensure that development and services are located where all of our people can best be served. In other words, that the right development can take place in the right places, at the right time"*

It is therefore requested that the Department takes on board the concerns of the City Council as set out under the 6 themes identified above in the preparation of the draft NPF. We would welcome the opportunity to further discuss on or expand on the matters raised above, if you so wish.

Yours sincerely,


Owen P Keegan
Chief Executive