Research Series Report RSR01

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Brownfield Land Activation

Oifig an Rialaitheora Pleanála
Office of the Planning Regulator

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Acronym List

Acronym	Explanation
ACA	Architectural Conservation Area
AHB	Approved Housing Body
AHF	Affordable Housing Fund
BER	Building Energy Rating
BHIS	Built Heritage Investment Scheme
BID	Business Improvement District
CABERNET	Concerted Action on Brownfield and Economic Regeneration Network
CAP24	Climate Action Plan 2024
CARO	Climate Action Regional Office
CDPs	County/City Development Plans
CIE	Córas Iompair Éireann
CLARINET	Contaminated Land Rehabilitation Network for Environmental Technologies in Europe
CORINE	Coordination of Information on the Environment
CPO	Compulsory Purchase Order
CREL	Cost Rental Equity Loan
DFHERIS	Department of Further and Higher Education, Research, Innovation and Science
DMURS	Design Manual for Urban Roads and Streets
EEA	European Environment Agency
EPA	Environmental Protection Agency
ERDF	European Regional Development Fund
ESB	Electricity Supply Board
ESPON	European Spatial Planning Observation Network
FCM	Federation of Canadian Municipalities
GDA	Greater Dublin Area
GIS	Geographic Information Systems
HFA	Housing Finance Agency
HSE	Health Service Executive
HSF	Historic Structures Fund
HTB	Help to Buy
JT	Just Transition
LCI	Living City Initiative
LDA	Land Development Agency

Acronym	Explanation
LiBRe	Leadership in Brownfield Renewal Programme
NDP	National Development Plan
NGO	Non-governmental Organisation
NMS	National Monuments Service
NOAG	National Oversight and Advisory Group
NPA	National Policy on Architecture
NPF	National Planning Framework
NPO	National Policy Objective
NSO	National Strategic Outcome
OECD	Organisation for Economic Co-operation and Development
OPR	Office of the Planning Regulator
OPW	Office of Public Works
PPN	Public Participation Network
PPP	Public-Private Partnership
RRDF	Rural Regeneration and Development Fund
RLS	Repair and Leasing Scheme
RSES	Regional Spatial and Economic Strategy
RSR	Research Series Report
RZLT	Residential Zoned Land Tax
SAC	Special Area of Conservation
SCSI	Society of Chartered Surveyors Ireland
SDRA	Strategic Development Regeneration Area
SDZ	Strategic Development Zone
SPA	Special Protection Area
STAR	Secure Tenancy Affordable Rental Investment Scheme
TCF	Town Centre First
TCP	Town Centre Partnership
TVRS	Town and Village Renewal Scheme
UDZ	Urban Development Zone
URDF	Urban Regeneration and Development Fund
VAT	Value Added Tax
VHT	Vacant Homes Tax
WHS	Warmer Homes Scheme

Section 1.0
Introduction

1.0 Introduction

Activating brownfield land offers a powerful opportunity to address urban development challenges while promoting environmental sustainability. By repurposing previously used or contaminated sites there is an opportunity to avoid urban sprawl, preserve green spaces, and reduce the environmental impacts associated with new greenfield development. Brownfield development can help to foster communities where people live, work and enjoy recreational space in an enhanced local environment.

1.1 Purpose of the Report

This report is the first Research Series Report published by the OPR and it focuses on the topic of *'Brownfield Land Activation Measures'*. Research Series Reports are defined in the OPR's **Planning Research Framework** as discrete publications on a particular topic/issue that reflect the format of more conventional research reports found in professional journals or academic periodicals.

This particular research project was identified as a *'Strand One - Planning Issues'* project in the OPR's **Strategic Planning Research Programme 2023 – 2025**. The research focuses on completed and ongoing brownfield urban regeneration and compact growth sites. It provides an insight into the key planning and wider conditions essential to delivering more compact growth. The report also identifies the enablers, barriers and opportunities that are experienced when the regeneration of a site is being considered and outlines potential actions to promote brownfield land activation.

1.2 Research Objectives

The research objectives are to:

- Create an evidence base of the key drivers and enablers of brownfield development;
- Identify the challenges, obstacles faced and opportunities;
- Identify best practice from lessons learned in case studies to inform potential policy development; and
- Outline findings and potential actions to promote brownfield land activation.

The scope of the research is solely focused on brownfield land activation and identifying the associated enablers and barriers associated with this type of development. This area of research is one of many areas which sit under the wider concept of compact growth. Other areas such as the cost of urban sprawl, infrastructure, environmental impact, sustainability, etc. are outside the scope of this research.

Section 2.0

National Policy Context and Proposed Policy and Legislative Amendments

2.0 National Policy Context and Proposed Policy and Legislative Amendments

2.1 The Current National Policy Context

The focus of this section is to examine the current strategic planning and policy context for brownfield land activation. Due to interwoven public policy issues in relation to delivering housing, sustainable development, promoting economic investment in run-down urban areas and supporting sustainable urban communities, there has been a strong shift towards supporting brownfield development in the current strategic planning and policy context as set out below.

In 2018, the government published Project Ireland 2040, comprising the **National Planning Framework** (NPF) which is a 20-year strategic plan for shaping the future growth and development of Ireland, and the **National Development Plan** (NDP) which is the public capital investment strategy to support implementation of the NPF. The delivery of compact growth, activation of strategic sites, achievement of effective density and consolidation, rather than urban sprawl, is identified in the NPF.

A key feature of both the NPF and NDP is that they share a common set of ten National Strategic Outcomes (NSOs) or strategic goals for co-ordinated planning and investment to secure long-term sustainable and balanced regional development.

NSO 1 relating to Compact Growth points out that in relation to potential development areas within the central areas of many urban settlements:

"Activating these strategic areas and achieving effective density and consolidation rather than more sprawl of urban development, is a top priority".

Compact growth is a concept that has gained significant recognition in recent decades. It has contributed to *"increases in productivity due to agglomeration economies; travel time savings due to shorter trips; and a smaller ecological footprint due to lower energy and land consumption".*[1] One of the components of compact growth is enhancing the sustainability of urban development patterns by the activation of more brownfield development opportunities. Another component is recognising the higher demand that urban sprawl creates for new infrastructure and services and the resultant heavy financial burden on the state.[2]

[1] Ahlfeldt, G., Pietrostefani, E., Schumann A., Matsumoto, T., OECD Regional Development Working Papers, 2018/03- Demystifying Compact Urban Growth: Evidence from 300 Studies from Across the World (2018).

[2] Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (2024).

In order to support compact growth, a greater focus on the re-use of existing buildings and previously developed land is required. Traditionally, urban centres in Ireland have developed along low-rise, low-density models that depend on private (mainly car-based) transport for a significant level of transport needs. This model for development creates challenges for the achievement of certain NPF objectives including a transition to a low carbon economy and climate resilient society.[3]

The NPF seeks to secure a more compact pattern of physical and spatial development in and around urban centres in Ireland, particularly the key cities and larger towns (with a population of 20,000 and over).

The NSOs in the NPF are further developed into National Policy Objectives (NPOs) which set out more specifics on the importance of renewal and development of existing urban areas rather than their continuous expansion by urban sprawl.

To give effect to the NSO for compact growth, NSO 1, National Policy Objective 3a (NPO3a)[4] requires that nationally at least 40% of all new homes must be delivered within the built-up footprint of existing settlements, including brownfield lands, but not exclusive of greenfield locations. The five cities, Dublin, Cork, Limerick, Galway and Waterford, are required to deliver at least 50% of all new homes[5] and the requirement for delivery of new homes in other settlements is 30%.[6] Regional and local tier plans are required to demonstrate consistency with the national level policy objectives.

2.2 Measures to Support Implementation of the NPF

Implementation of the NPF is supported by specific funding measures under the Urban Regeneration and Development Fund (URDF) and the Rural Regeneration and Development Fund (RRDF). The establishment of the Land Development Agency (LDA) also contributed to mobilising the development of key urban state lands and other sites. In May 2023, the LDA launched its first report on the potential of state-owned land to deliver housing into the future and the register of relevant lands.[7] The register serves as a strategic mapping tool, supporting land management and helping to build an understanding of the extent and location of public lands. It can also support spatial planning and urban rejuvenation and enhance transparency regarding public land interests.

The legislation underpinning the NPF also provided for the establishment of the OPR,[8] which has responsibility for monitoring implementation of the NPF.[9] One of the focus areas of the OPR's plan evaluation work is ensuring that plans and policies avoid urban sprawl. In the performance of its duties, the recommendations[10] issued by the OPR in relation to land-use zoning, seek to ensure a sequential approach to development is applied to achieve a compact growth pattern within settlements.

3 National Strategic Outcome 8, National Planning Framework, 2018.

4 National Policy Objective 3a, National Planning Framework, 2018.

5 National Policy Objective 3b, National Planning Framework, 2018.

6 National Policy Objective 3c, National Planning Framework, 2018.

7 As required under the LDA Act 2021.

8 Planning and Development (Amendment) Act 2018.

9 Page 12, National Planning Framework, 2018.

10 Section 31AM of the Planning and Development Act 2000, as amended.

The OPR has, to date, recommended the issuance of 13 Ministerial Final Directions that related, in full or in part, to an insufficient focus on the achievement of the compact growth requirements of the NPF.[11]

2.3 Challenges Faced with the Implementation of the NPF

The NPF and, in particular, the identification of the NSO for compact growth was an important step forward, however, various factors have challenged and delayed the progress of embedding the NPF in policy-making and decision-making processes, since its publication in 2018.[12] An expert group, tasked with reviewing the NPF in advance of the next revision, identified the exceptional changes brought on by the evolution of working practices associated with COVID-19 and the acute shortage of specific skills (such as planning, economic and project management) as the main barriers to the implementation of the NPF to date.

Given the increase in population, with an accelerating growth rate of 8.1% between 2016 and 2022[13] and forecasts of continued population increases, it is important that this growth is planned for and accommodated in a sustainable way. Renewal and redevelopment within existing settlements will be required rather than continual expansion and sprawl of cities and towns into the countryside. Along with achieving the goal to deliver compact growth identified in the NPF, planned and sustainable growth will assist in fulfilling a number of the NSOs.

2.4 Implementation of the NPF at a Local Level

Most local authorities have recently reviewed their county or city development plans (CDPs), and to varying degrees have embedded the compact growth principles set out in the NPF and translated this down to the local levels.[14] This review process is largely complete and will ultimately, in time, influence the location and form of development, which takes place across the country. Through a balanced densification, oriented towards brownfield re-use, negative impacts such as soil sealing, loss of agricultural land, higher costs of infrastructure and transport-related emissions can be mitigated.[15] This will assist in the delivery of government policy, compliance with legal requirements of EU Directives and commitments under international law, particularly in respect of climate action.

In tandem with the review of the CDPs local authorities have also been working to implement the government's Town Centre First (TCF) policy, launched in February 2022, which aims to tackle vacancy, combat dereliction and breathe new life into town centres. Under TCF, a National Town Centre First Office, was established supporting a network of local Town Regeneration Officers (appointed in 26 local authorities). Other TCF policies include mapping data for towns to provide an on-going evidence base, development of a national toolkit to support implementation of the policy, engagement with Approved Housing Bodies (AHBs) to develop suitable accommodation in town centres, working with the LDA and the development of a dedicated and on-going research and evidence base platform.

[11] Recommendations made by the OPR to the Minister.

[12] Report of Expert Group for the First Revision of the National Planning Framework (2023).

[13] Population at each Census.

[14] Project Ireland 2040: Annual Report 2022 (2023).

[15] ESPON- Final Report: Ensure: Slovakia Spin-off: Challenges and Opportunities for Urban Brownfield Regeneration (2022).

2.5 Forthcoming Amendments to Government Policy and Planning and Development Legislation

In June 2023, the government approved commencement of the process of reviewing the NPF. As noted in Section 2.3 above, an expert group was established to undertake a high-level review and to scope out potential revisions to the NPF. In their report of August 2023,[16] one of the key recommendations (Recommendation 2) related to the current targets for compact growth where the expert group recommended that these should be stronger and more ambitious.

In addition to the review of the NPF, the government has also undertaken a review of the existing planning and development legislation. Aspects of the Planning and Development Bill 2023 (the Bill) published in November 2023 are also relevant to the evolving urban development policy context. For example, in relation to regeneration and achievement of compact growth, the Bill proposes Urban Development Zones (UDZs) which:

"...will empower local authorities to designate areas with significant potential for development, including housing, as Candidate Urban Development Zones and for the Government to designate such areas as Urban Development Zones. These areas will be a focus of State investment in key enabling infrastructure in order to ensure the potential for development can be realised in a timely manner".

2.6 Climate Action and Brownfield Development

The third annual update to Ireland's Climate Action Plan was approved by government in December 2023. The **Climate Action Plan 2024** (CAP24) aims to close the emissions gap and provide the roadmap for delivering on Ireland's climate action ambitions. It identifies a wide range of actions that need to be rapidly and fully implemented. The Climate Change Advisory Council's recommendations, that were a key input to CAP24, refer specifically to compact growth and brownfield/infill development. In particular, they highlighted that compact growth targets in the NPF are insufficiently ambitious and that economic incentives for urban brownfield/infill development need to be addressed to limit urban sprawl.

2.7 In Summary

The measures combined demonstrate a clear ambition from government to support development on brownfield lands and to encourage compact growth. Through the NDP, Housing for All, planning reform and related initiatives aimed at urban regeneration and brownfield development, government is seeking to secure the NSOs identified in the NPF and NDP (see Section 5). However, at the same time this research identifies a range of organisational and operational challenges that present systemic barriers to the realisation of the government's ambition above.

[16] Report of Expert Group for the First Revision of the National Planning Framework (2023).

Section 3.0

What is Brownfield Development and Urban Sprawl?

3.0 What is Brownfield Development and Urban Sprawl?

3.1 Brownfield Development

Activating urban infill and brownfield sites is a key component, and requirement, necessary for the delivery of the government's Project Ireland 2040 plan to support the future development and regeneration of urban areas across the country. The term *'brownfield'* can mean different things in different jurisdictions. For the purposes of this research report, the following definition of brownfield lands has been adopted. *'Brownfield'* lands, which may be defined as:

"...land which has been subjected to building, engineering or other operations, excluding temporary uses or urban green spaces, generally comprising of redundant industrial lands or docks but may also include former barracks, hospitals or even occasionally, obsolete housing areas".[17]

In this report, the term brownfield lands is an umbrella term which is used to describe a wide range of sites including: abandoned sites, infill sites, vacant and derelict properties and partially complete structures. These lands can have real or perceived contamination problems and issues. In some European jurisdictions the presence of contamination is included in the description of brownfield lands.[18] Brownfield lands can range from small infill urban sites to significant plots of dis-used lands from a previous use (i.e. industrial, railway, residential, etc.).

In Ireland, there is no formal national register of brownfield lands, however, local authorities are required to maintain vacant site[19] and derelict site[20] registers. These registers record the sites that fall into one of these two categories. There is a general consensus that these registers do not capture the real quantity of derelict and vacant sites across Ireland. For example, in January 2024, there were 11 local authorities with either no vacant site register (on their website) or who had a register with no entries. Of the remaining 20 local authorities, 12 had ten or less vacant sites on their register.

Ever-changing demographics and changes to the business world are factors that contribute to dereliction in urban centres. This is particularly evident in smaller towns and villages. Research shows that the existence of brownfield lands is mainly attributable to economic change and business closures. A report published by the Society of Chartered Surveyors Ireland (SCSI) identified, through a number of case studies, key trends and barriers to successfully rejuvenating derelict and vacant properties.[21]

[17] Sustainable Residential Development and Compact Settlements: Guidelines for Planning Authorities (2024): Appendix A: Glossary of Terms.

[18] CABERNET- Sustainable Brownfield Regeneration: CABERNET Network Report (2006).

[19] Urban Regeneration and Housing Act 2015.

[20] Derelict Sites Act, 1990.

[21] SCSI- Real Cost of Renovation Report: Vacant and Derelict Properties for Residential Use (2023).

Critical success factors needed to stimulate the redevelopment of vacant and derelict sites were also identified. Brownfield lands, characterised by their previous use, hold significant potential for redevelopment and sustainable urban transformation. Activating brownfield lands, regenerating unused, underused or abandoned areas and buildings not only addresses the challenge of urban sprawl but also contributes to environmental conservation by repurposing underutilised spaces. The term *'stranded asset'* is a common term used in real estate in recent years. It refers to the early obsolescence of properties due to the inability to meet future regulatory standards and market expectations on sustainability. The national stock of underused and, vacant or derelict sites are in effect *'stranded'*.

3.2 Urban Sprawl

Whilst there is no universal definition of *'sprawl'*, it is generally understood to be the expansion of our cities and towns, using low-density residential housing and one-off houses in rural areas, with increased reliance on private car-based transport. Urban sprawl occurs when the rate of land use conversion and consumption for urban uses exceeds the rate of population growth for a given area over a specified period. The European Environment Agency (EEA) highlighted urban sprawl as one of the major common challenges facing urban Europe today.[22]

The type of development contributing to urban sprawl includes either dispersed, leapfrogging or ribbon suburban forms with over-developed road networks, low mix of uses and a lack of local public amenities. See Section 6 for further consideration of the concept of urban sprawl.

[22] EEA- Urban Sprawl in Europe: The Ignored Challenge (2006).

Section 4.0
Methodology

4.0 Methodology

4.1 Rationale

Activating brownfield land involves converting underutilised or abandoned sites, into productive and sustainable spaces. There are information gaps on the factors that influence the activation of brownfield land and the reasons why certain projects have progressed where others have not. In order to effectively understand the range of factors involved in successful brownfield land activation, a systematic approach and methodology involving detailed case study analysis with a qualitative investigative approach was adopted for the purposes of this research project.

4.2 Methodology

The methodology is grounded on the gathering of information and data to generate an in-depth understanding of the issues associated with activating brownfield land from a range of perspectives. There are four strands including:

- A literature review with an analysis of relevant policy and research literature;
- Case studies and analysis;
- In-depth interviews; and
- A cost comparison exercise using the industry experience of construction consultants, Mitchell McDermott.

4.2.1 Literature Review

The literature review consisted of a review of relevant national policies, guidelines, regulations and funding programmes all of which combined provide the context and current backdrop to brownfield development in Ireland, including how this has evolved over time.

In addition, a review of international research literature was undertaken relating to brownfield development. This review focused on specific countries that are implementing strategies to target brownfield redevelopment.

4.2.2 Case Study and Analysis

A case study analysis methodology was adopted in order to gain an in-depth understanding of enablers and barriers as well as the conditions under which brownfield redevelopments are progressed in Ireland. For the purposes of the research, four typologies were identified which are typically the most common types of brownfield sites in Ireland. It should be noted that the research does not focus on sites of a sensitive nature i.e. those sites that contain heritage or protected structures. While three of the four case studies contain a protected structure or similar, this report does not explore the nuances of this specialist area.

The four typologies, used as the basis for selecting the case studies, are summarised in Table 1 below. It is recognised that the size and scale of redevelopment can vary significantly within these four typologies.

Typology	Description	Reference Image
Type 1 - Vacant Site	Vacant site where the previous use/structure has been abandoned and the remains of the structure/use still exist.	
Type 2 - Vacant Building	Vacant mixed-use property where there was a variety of uses including retail/ commercial at ground floor level and residential above.	
Type 3 - Derelict Site	Existing vacant dwellings which have become derelict and structurally unstable and are unsafe.	
Type 4 - Conversion	Existing building with opportunity to repurpose or convert to alternative use.	

Table 1: The Four Typologies Used to Select the Case Studies.

The case studies range in scale from small infill sites to large regeneration projects. They showcase regeneration projects on brownfield lands where work is currently underway and where specific enablers have facilitated development and barriers have been or are being managed.

It was agreed from the outset that the case studies should be geographically diverse. Selection of the case studies required consideration of various factors to ensure the case studies were relevant, informative and conducive to the research. The case study selection matrix considered a range of factors including: relevance to research questions, variation and diversity, practical significance, and access to information. A range of organisations and individuals were contacted to participate in the research.

An initial list of case studies was drawn up that represented medium to large-scale brownfield redevelopment type projects. The final list of case studies is included in Table 2 below. These are reviewed in detail in Section 7.

Each case study was reviewed individually as each project is unique and of varying scale and complexity. As part of the case study analysis, a review was undertaken of all available project documentation. A representative from the project team for each case study was identified and a meeting was arranged to explain the nature of the research and the purpose of the case study analysis. An in-depth interview was conducted with the representative from the project team which provided a detailed overview of the project. Subsequent to this, a template with a series of headings and questions seeking further information was shared with the project team representative. The same template was shared with the representative for each project team across each of the four case study projects to ensure similar information was captured. These templates were completed and returned and supplied additional critical information.

Each case study was reviewed under three main headings including:

- Legal and Regulatory;
- Economic and Financial; and
- Social and Cultural.

Under each heading, a series of questions was responded to which allowed a greater understanding of how the project has reached its current status.

Typology	Project	Sponsor/Developer	Location
Type 1 - Vacant Site	Emmet Road Redevelopment	Dublin City Council	Inchicore, Dublin 8
Type 2 - Vacant Building	15 Richmond Avenue	Focus Housing Association	Fairview, Dublin 3
Type 3 - Derelict Site	St. Kevin's Redevelopment	Land Development Agency	Shanakiel, Cork
Type 4 - Conversion	City Library - Mayfair Hall	Kilkenny County Council	Abbey Quarter, Kilkenny

Table 2: The Four Selected Case Studies.

4.2.3 In-depth Interviews

The in-depth interviews provided a platform to capture the rich, context-specific knowledge held by experienced professionals who navigate the intricacies of brownfield redevelopment. Selecting interviewees for this qualitative research involved careful consideration of several factors. The rationale for choosing specific individuals was based on the research objectives and the expertise needed to address the research questions. The criteria for selection included: relevance to research questions, depth of knowledge, diversity of perspectives, practical experience, credibility and recognition, and interdisciplinary insights.

Following consideration of the research objectives, an initial long list of 15 interviewees was created. The long list captured a mix of roles and disciplines as well as a diversity across the public and private sector. Due to various reasons, three interviewees were unavailable to participate which ultimately reduced the final list to 12 interviewees. A list of the interviewees is included in Appendix A. In two instances, more than one individual from the same organisation was interviewed. This was on the basis that the particular individuals provided alternative viewpoints based on their respective disciplines, specialist areas and previous experience.

The interviews were semi-structured and were conducted over a period of two months from October 2023 to November 2023. In advance of each interview, the interviewee was provided with an overview of the research project and the interview questions. To maintain confidentiality, all interviewees were advised that comments would not be attributable to individuals, and that views would be presented in an anonymised format. Interviews ranged in duration from 60 to 90 minutes.

The semi-structured interviews were organised around four key themes. These were: non-physical challenges, physical challenges, barriers to redevelopment, and suggested solutions. The information collated from the interviews was examined to identify common issues, experiences and transferable examples of best practice. The interviewees provided views on the main themes by way of anecdotal reference to particular projects. This has been anonymously documented in Section 8.

Information from both the interviews and case studies was examined collectively to cross-reference issues that were common to both. It is important to note that although similarities and differences are considered across the four case studies, the research is not intended as a comparative analysis as each case study represents a different typology as identified in Section 4.2.2.

4.2.4 Cost Comparison – Direct and Indirect Costs

To further enhance the research and build on the insights arising from the qualitative research, a cost comparison exercise was undertaken. This exercise provides a quantifiable analysis of a residential development on brownfield lands, that encountered some of the challenges and issues discussed in the case studies and interviews, and this was compared to a similar development on a hypothetical greenfield site.

A *'live'* residential project, that is currently at construction stage, was selected for the analysis. Due to commercial sensitivity the project is anonymised but the site is located in the Greater Dublin Area (GDA). The project consists of the redevelopment of a brownfield site into a six-storey block accommodating 110 residential units. The project was selected due to the characteristics of the existing site and the challenges that the project has encountered to date. For the purposes of the comparison, it is assumed the same six-storey block with 110 residential units is developed on a hypothetical greenfield site. The details of the hypothetical site are provided in Section 9.

The analysis includes total direct development costs which includes hard costs i.e. construction costs and soft costs i.e. professional fees, statutory contributions, VAT, etc. As per previous cost studies, published by the SCSI, hard costs account for approximately 50% only of the total development costs.[23] For the purposes of the hard costs and soft costs of both brownfield and greenfield projects, a combination of publicly available information, market norms and expert input has been used to derive the total development costs on a cost per residential unit (i.e. standard two bed apartment) basis.

A series of scenarios are presented on greenfield and brownfield development appraisals which identify the level of subvention required for each scenario. The scenarios are modelled to understand the impact on viability of different challenges that brownfield developments may encounter. The level of subvention required to make the projects viable is subsequently reviewed and discussed in the light of the indirect costs of sprawl which is not part of the scope of this report but is useful for context.

All costs are baselined to the third quarter 2023 pricing levels in the GDA and include Value Added Tax (VAT).

[23] SCSI- The Real Costs of New Apartment Delivery: Analysis of Apartment Development Costs and Viability (2021).

4.3 Research Limitations and Scope

The qualitative methodology for the research using semi-structured interviews and case studies offers valuable, in-depth insights into brownfield land activation, however, it is important to recognise the limitations.

For the interviews and case studies, while efforts were made to ensure that a range of perspectives, experiences and geographic contexts were captured, the small sample of case studies selected cannot adequately represent a full range of perspectives from relevant stakeholders. The findings from the interviews and case studies cannot therefore be generalised. Projects which weighted heavily with heritage elements or protected structures were not considered.

The literature review is a focused review of a selection of countries with published policies, reports and analysis on brownfield land activation as well as relevant policies and reports providing the Irish context. It is acknowledged that although the research has inherent limitations the combination of literature reviews, case studies, expert interviews, industry experience and cost analysis provides diverse and objective findings on brownfield land activation.

Section 5.0

Fiscal and Taxation Measures Facilitating the Development of Brownfield Lands

5.0 Fiscal and Taxation Measures Facilitating the Development of Brownfield Lands

This section provides an overview of initiatives and subventions available to stimulate brownfield activation and promote compact growth. Figure 1 below highlights some notable state initiatives over the last ten years to bring forward the reuse of existing urban areas.

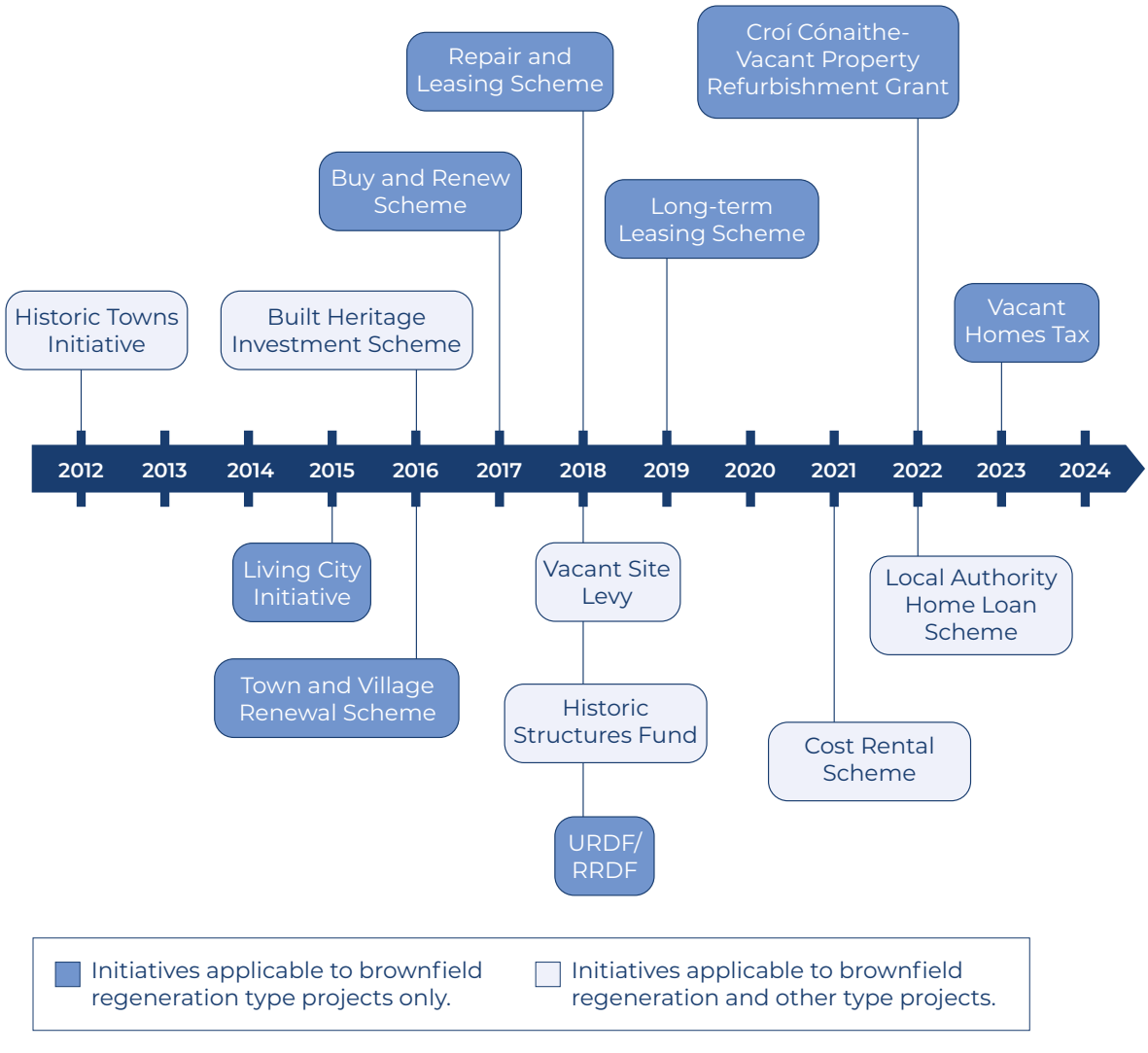

Figure 1: State Initiatives to Promote Reuse of Existing Urban Areas (2012 to 2023).

Prior to the above, the Derelict Sites Act, 1990 (the Act) enabled local authorities to address derelict sites, which are defined as any land that *"detracts, or is likely to detract, to a material degree from the amenity, character or appearance of land in the neighbourhood of the land in question..."*. All local authorities must maintain a derelict sites register and can prosecute owners who do not comply with notices served under the Act. The Act allows local authorities to purchase a derelict site either by agreement with the owner or by compulsory purchase. Owners of urban land that has been entered into the derelict sites register must pay an annual levy to the local authority. The levy is currently 7%[24] of the market value of the land. Data from the Department of Housing, Local Government and Heritage showed that only 17% of levies were collected in 2022.

The Town and Village Renewal Scheme (TVRS), initiated in 2016, is designed to revitalise and regenerate rural towns and villages, having supported over 1,700 projects with over €154 million[25] of approved funding. The TVRS focuses on tackling vacancy and dereliction and supporting local authorities to acquire land for town regeneration. In addition to the TVRS scheme, the Building Acquisition Measure was launched in 2022 in recognition of the urgent need to transform and regenerate town centres.

The Vacant Site Levy was introduced in 2018 to stimulate development of housing on vacant sites and reduce the hoarding of land. The levy was implemented through the Urban Regeneration and Housing Act 2015 (as amended). The levy is an annual charge, payable retrospectively. It was initially set at 3% of the market value of the vacant site but was increased to 7% in 2019. The levy is administered by local authorities who maintain a *'live'* register of vacant sites and must notify owners of their intention to include a site on the register.

To date, the enforcement of the levy has encountered issues due to varying interpretations of what constitutes a *'vacant site'* and especially the provisions in the legislation which state a site must be *"empty or unoccupied"* and *"not in use"*. In May 2023, it was noted that almost 1.4%[26] of the total levy for 2021 was paid with a total of €5.51 million of unpaid levies for 2021 alone.

In June 2022, the government launched a new Residential Zoned Land Tax (RZLT). It is intended that this tax will replace the vacant site levy over the coming years. The primary purpose of the tax is to incentivise residential development focusing on strategic underused key sites in cities, towns and villages. Lands subject to the tax have been identified through a local authority-led mapping exercise, associated consultation and an appeal mechanism through An Bord Pleanála. The liability date for the RZLT is 1 February 2025.

Furthermore, in December 2022 the government approved the updated General Scheme for the Land Value Sharing and Urban Development Zones Bill. The scheme made provision for local authorities to secure a proportion of the increase in land values arising from decisions to zone land or lands subject to an Urban Development Zone (UDZ) designation (referred to in Section 2.5 above).

In May 2022 the government announced the establishment of a Housing for All initiative called the Croí Cónaithe fund. This fund seeks to provide new accommodation in vacant properties in cities, towns and villages with two strands including a Vacant Property Refurbishment Grant and a Ready to Build Scheme. The Vacant Property Refurbishment Grant supports people seeking to refurbish a vacant house or building. The Ready to Build Scheme allows local authorities to make serviced sites available in towns and villages at discounted rates to individuals to build their principal private residence. The fund is available to the general public and there are specific conditions allowing a clawback if the applicant sells the property or otherwise.

[24] The Journal- Most Local Authorities Didn't Collect any of the Derelict Sites Levy in 2022 (27 July 2023).

[25] Our Rural Future: Minister Humphreys launches 2023 Town and Village Renewal Scheme (21 July 2023).

[26] Irish Times- Only 1% of Vacant Site Levies Collected in 2021 (8 May 2023).

Various other initiatives and schemes exist which seek to support the redevelopment of brownfield lands in urban areas. It is worth highlighting that some of these initiatives are also available to greenfield developments and are not limited solely to brownfield lands. These schemes are a mixture of local authority-led applications and private owner/landlord. (see Table 3 below and Appendix B).

Category	Initiative	Brownfield Only
Public	Urban Regeneration and Development Fund (URDF)	Yes
Public	Rural Regeneration and Development Fund (RRDF)	Yes
Public	Buy and Renew Scheme	Yes
Public	Cost Rental Equity Loan (CREL) Scheme	No
Public	Town and Village Renewal Scheme (TVRS)	Yes
Public	Historic Towns Initiative	Yes

Category	Initiative	Brownfield Only
Private	Croí Cónaithe (Towns) Fund- Vacant Property Refurbishment Grant	Yes
Private	Repair and Leasing Scheme	Yes
Private	National Home Energy Upgrade Loan Scheme/One Stop Shop Service	Yes
Private	Better Energy Homes Scheme	Yes
Private	Better Energy Warmer Homes Scheme (WHS)	Yes
Private	Living City Initiative (LCI)	Yes
Private	Long-term Leasing Scheme	No
Private	Local Authority Home Loan Scheme	No
Private	Built Heritage Investment Scheme (BHIS)	No
Private	Historic Structures Fund (HSF)	No
Private	Temporary Development Contribution Waiver Scheme	No
Private	Secure Tenancy Affordable Rental (STAR) Investment Scheme	No
Private	Croí Cónaithe (Cities) Scheme	No
Private	Project Tosaigh	No

Category	Initiative	Brownfield Only
Private	Vacant Homes Tax (VHT)	Yes
Private	Vacant Site Levy	No
Private	Derelict Site Levy	Yes

Table 3: Details of Initiatives and Schemes to Support the Redevelopment of Brownfield Lands.

Section 6.0

Lessons from the International Context

6.0 Lessons from the International Context

6.1 The Concept of Urban Sprawl

A comprehensive definition of urban sprawl from the EEA is as follows:

"Urban sprawl is commonly used to describe physically expanding urban areas. The EEA has described sprawl as the physical pattern of low-density expansion of large urban areas, under market conditions, mainly into the surrounding agricultural areas. Sprawl is the leading edge of urban growth and implies little planning control of land subdivision. Development is patchy, scattered and strung out, with a tendency for discontinuity. It leap-frogs over areas, leaving agricultural enclaves. Sprawling cities are the opposite of compact cities — full of empty spaces that indicate the inefficiencies in development and highlight the consequences of uncontrolled growth". [27]

The CORINE (Coordination of Information on the Environment) land map data published by the Environmental Protection Agency (EPA), shows the extent of sprawl in Ireland. This data is part of the overall COPERNICUS pan-European land cover data series. The CORINE is an inventory of European land cover split into 44 different land cover classes and shows the changes between classes over four periods since 1990. Both land cover and land cover change are shown at high resolution on a cartographic map. The CORINE database is produced in cooperation with European countries.

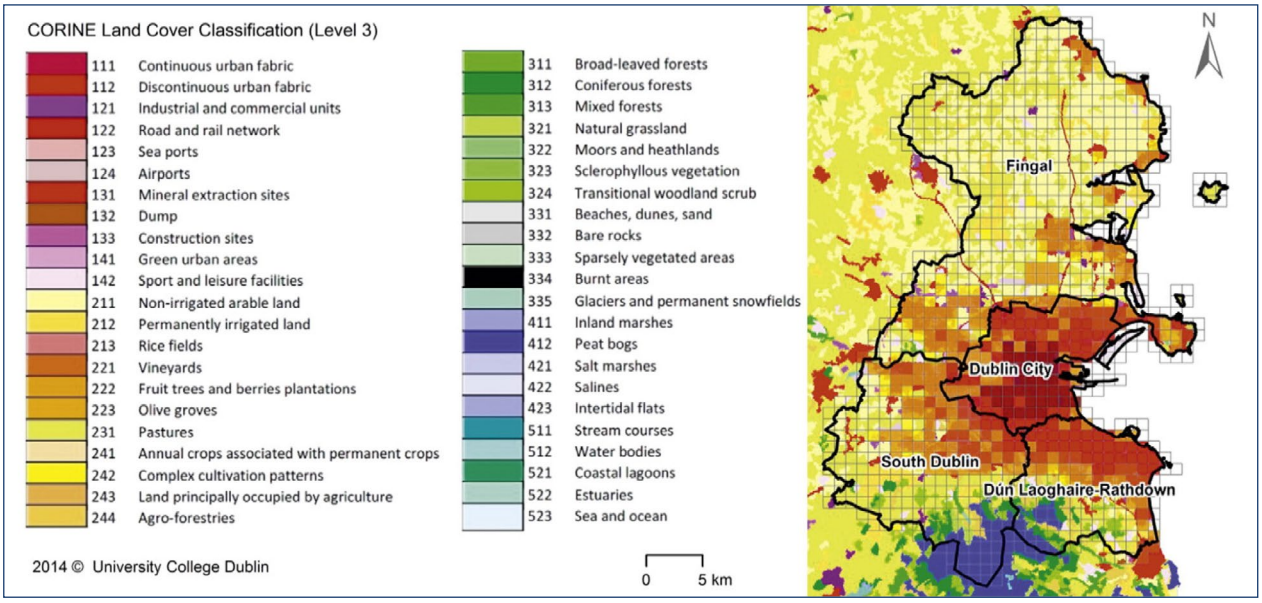

Figure 2: Land Use in the Dublin Region – Sourced from Measuring Urban Form at Community Scales: Case Study of Dublin, Ireland, Nedovic-Budic. Z. et al./ Cities 55, Pages 148-164, 2016.

[27] Joint EEA/FOEN Report no. 11/2016- Urban Sprawl in Europe (2016).

This useful resource shows the change in land use across four separate time periods (1990-2000, 2000-2006, 2006-2012 and 2012-2018) where new development types can be tracked across city suburbs, towns and villages.

Overall, there is initial evidence that Europe is prone to sprawl and potentially affected by the related inefficient consumption of natural resources and energy and impacts in terms of environmental, economic, and social dynamics.[28] In 2006, Dublin was used by the EEA as a *"worst-case scenario"* of urban planning so that newer EU member states such as Poland might avoid making the same mistakes.

In its report, the EEA highlighted Dublin, Madrid and Istanbul as case studies to show what can happen when development is allowed to run out of control and expressed their surprise with the timeline maps, because they showed *"that sprawl was so extensive in a country where the geography is not designed for such a thing"*.

There is a significant body of international research on urban sprawl, but very little carried out in Ireland. Canada, Australia and the US have completed useful scientific studies with accompanying data analysis on the cost of sprawl but less so in Europe with limited research on the actual cost of sprawl. The Organisation for Economic Co-operation and Development (OECD) also published a report on the nature of urban sprawl, its causes and environmental, social and economic consequences in 2018.[29]

One of the most useful studies in an Irish context, *'Measuring Urban Form at Community Scale: Case Study of Dublin, Ireland'* conducted by Z. Nedovic-Budic et al. adapted the scientific approach used by Knaap et al. (2007) and applied it to the data available in Ireland. They divided the GDA into a 1km x 1km grid and assessed the changes in land use over five periods (before 1950, 1950-1966, 1966-1980, 1980-2000 and 2000-2006). They noted that post the 1980s recession, Ireland experienced unprecedented growth from the early 1990s, assisted by EU structural funds and commented that over the course of 17 years from early 1990 to 2007, the GDA, specifically Dublin, experienced the greatest urban redevelopment and new growth. During this time, the GDA gained an additional 250,000 people and received significant investment in road infrastructure, including the M50 motorway, the Dublin Port Tunnel and upgraded arterial roads. Figure 3 opposite shows the extent of growth since before 1950.

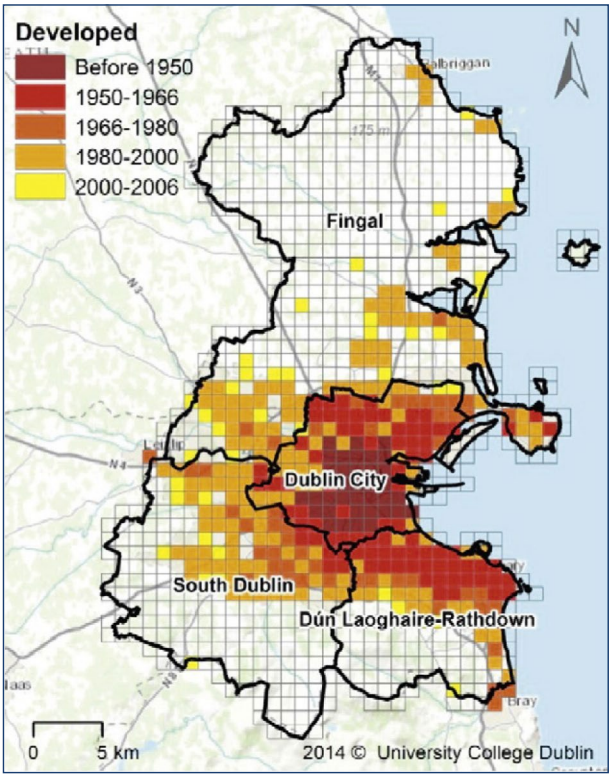

Figure 3: Land Use in the Dublin Region From Before 1950 to 2006 – Sourced from Measuring Urban Form at Community Scales: Case Study of Dublin, Ireland, Nedovic-Budic. Z. et al./ Cities 55, Pages 148-164, 2016.

[28] EEA- Urban Sprawl in Europe: The Ignored Challenge (2006).

[29] OECD- Rethinking Urban Sprawl: Moving Towards Sustainable Cities (2018).

A report by Sustainable Prosperity, a national research and policy network, based at the University of Ottawa, Canada, entitled, *'Suburban Sprawl: Exposing Hidden Costs, Identifying Innovations* (2013)'[30] provides useful evidence on the cost of urban sprawl. It examined the direct capital and operational costs of urban sprawl, which showed that the additional public cost of maintaining a suburban household was 244% higher than an urban household. See Figure 4 below for more details.

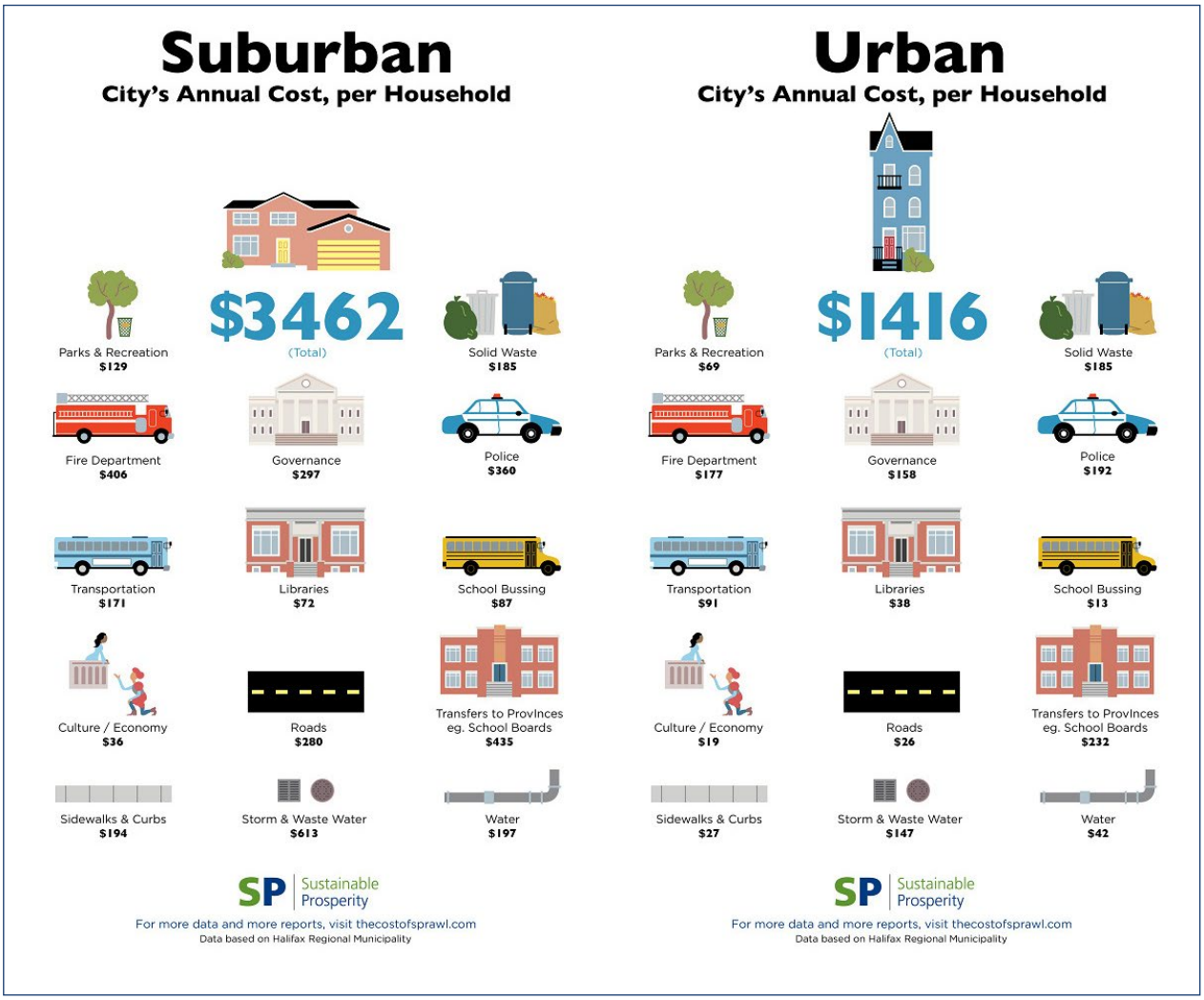

Figure 4: Infographics entitled the 'Cost of Sprawl: Suburban Development' and the 'Cost of Sprawl: Urban Development' – Sustainable Prosperity.

[30] Sustainable Prosperity, Thompson, D.- Suburban Sprawl: Exposing Hidden Costs, Identifying Innovations (2013).

6.2 EU CABERNET Network

The growing presence of brownfield lands and the challenges around the activation of these lands are not unique to Ireland. At European level, there is an increasing interest in brownfield regeneration as a driver of sustainable urbanisation. The Concerted Action on Brownfield and Economic Regeneration Network (CABERNET) was established in 2002 and is a European multi-stakeholder network that focuses on the complex issues that are raised by brownfield regeneration. In a report published in 2006, CABERNET stated that *"swift wide scale dereliction in some areas and slow decline elsewhere"* over the previous 50 years has left Europe with *"a significant legacy of brownfield sites"*.[31] Unsustainable land management has led to *"urban decay, deprivation and social conflicts"* and CABERNET goes onto state the *"...persistence and distribution of brownfield sites represents a significant trans-European urban management problem"*. The report called for concerted action at local, national and EU level and has developed models to understand and address the dynamics of brownfield development. These are discussed further in this section.

The graph shown in Figure 5 below presents the extent of brownfield lands and contaminated sites in various European countries. The data gathered by the Contaminated Land Rehabilitation Network for Environmental Technologies in Europe (CLARINET)[32] in 2002 showed that only a few countries have undertaken surveys or similar to understand the extent of the brownfield problem in terms of total size of land. For example, in Germany 128,000 hectares of land is classified as brownfield and there are 362,000 potential contaminated sites. Ireland is estimated to have 2,300 contaminated sites with no data available on the land area of brownfield lands. Austria, Denmark, Finland, Greece, Norway, Portugal and Spain have no or limited information for their respective jurisdictions. It should be noted that there is no European or international definition of brownfield lands with each country adopting their own meaning.

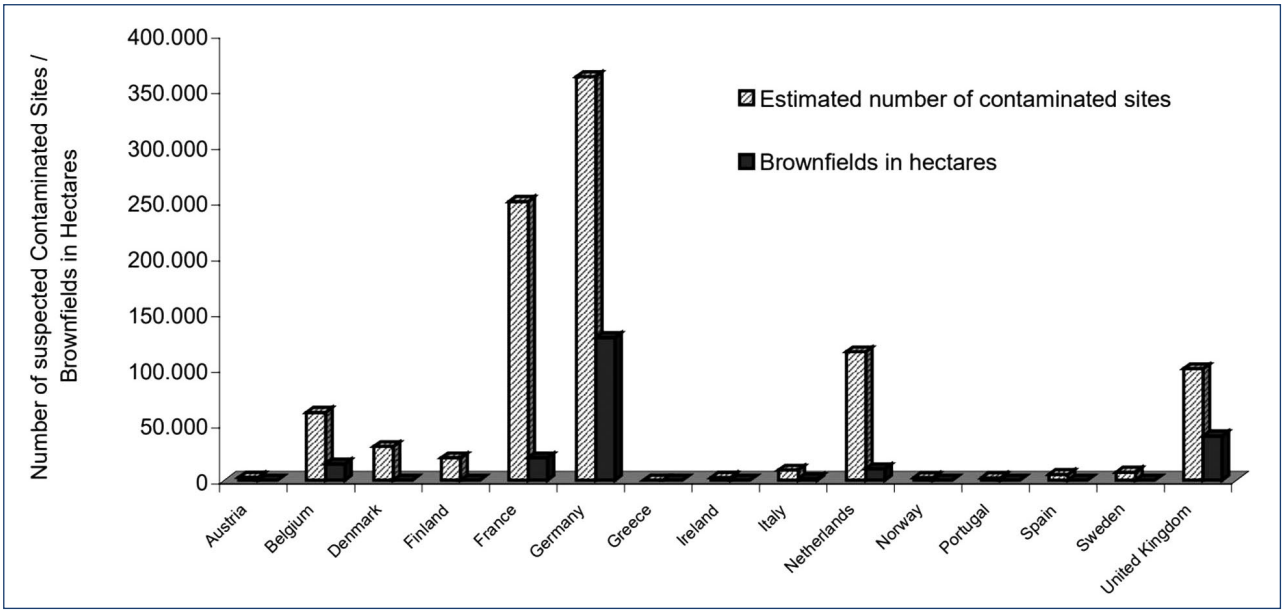

Figure 5: The Extent of Brownfield and Contaminated Sites in Various European Countries – Sourced from the data gathered by CLARINET.

[31] CABERNET- Sustainable Brownfield Regeneration: CABERNET Network Report (2006).

[32] CLARINET- Brownfields and Redevelopment of Urban Areas (2002).

More recently, many jurisdictions across Europe have taken different approaches to address excessive vacant properties.[33] For example in the UK, authorities have the power to increase council tax on properties that have been *'unoccupied and substantially unfurnished'* for a long period of time. In Scotland the council tax can be doubled if the property has been unoccupied for more than 12 months and in the rest of the UK the amount to pay depends on the length of time the property has been empty for, with the option to charge four times the normal council tax if the property has been empty for over ten years. Similar to the vacant homes tax in Ireland, in Denmark, a complex system for property ownership and use effectively ensures that no home is vacant for longer than 180 days per annum. Property owners are obligated to either live there or rent it out as a permanent residence.

6.3 Slovakia

In Slovakia, the ENSURE/Slovakia project was set-up to renew focus on brownfield land activation and establish a link between the European recommendations which set a target for no net land take by 2050 and further policies in Slovakia.[34] The report identified several challenges with institutional and legislative barriers cited as the most urgent. These challenges range from macro level (market) down to micro (local planning) and the report details the need for integrated policies and planning methods.

6.4 Canada

There are tens of thousands of brownfield sites across Canada with up to 25% of the urban landscape contaminated by previous uses.[35] Many of these sites are stated to be in prime locations, however, in many instances they sit idle for years due to a complicated redevelopment pathway. Following analysis of successful projects, it is reported that brownfield redevelopment generates significant benefits and that failing to take action comes with considerable risk. It recognises that redevelopment measures are required to *"...level the playing field between brownfields and other available sites"*.

The Federation of Canadian Municipalities (FCM), an advocacy group representing over 2,000 Canadian municipalities, has developed a guidebook under their Leadership in Brownfield Renewal Programme (LiBRe) framework.

Figure 6: Risks and Benefits - Extract from Federation of Canadian Municipalities Guidebook (2015) – Getting started on your brownfield sites: Committing to action.

[33] SCSI- Real Cost of Renovation Report: Vacant and Derelict Properties for Residential Use (2023).

[34] EPSON- Final Report: Ensure: Slovakia Spin-off: Challenges and Opportunities for Urban Brownfield Regeneration (2022).

[35] Federation of Canadian Municipalities- Getting Started on your Brownfield Sites: Committing to Action (2015).

The guidebook, part of a series of reports, provides basic concepts that are important to understand before tackling the problem and sets out the reasons and ways to support brownfield redevelopment. The guidebook is based on practices which have been successfully implemented in various municipalities. It states that brownfield strategies should be developed by individual municipalities that identify priority sites, outline obstacles to redevelopment and recommends measures to overcome them.

6.5 Models Developed to Explain the Dynamics of Brownfield Sites

Similar to FCM, CABERNET has developed various models to help firstly, understand the dynamics of brownfield and secondly, suggest some steps that can be taken to help to address it. The *'Bath Model'* (see Figure 7 below) highlights the dynamics of regeneration i.e. *'emptying the bath'* and wider land-use issues which continue to *'fill the bath'*.

The CABERNET Bath Model demonstrates that as long as the bath continues to *'refill'*, due to the creation of brownfield lands, towns and cities will always have brownfield lands. If the rate of *'refill'* outpaces the rate of regeneration, then the overall area of brownfield lands will increase. The red *'sludge'* at the bottom of the bath depicts the least attractive sites that are generally of low economic value. These sites remain disused or vacant brownfield for an extended period and require some degree of intervention.

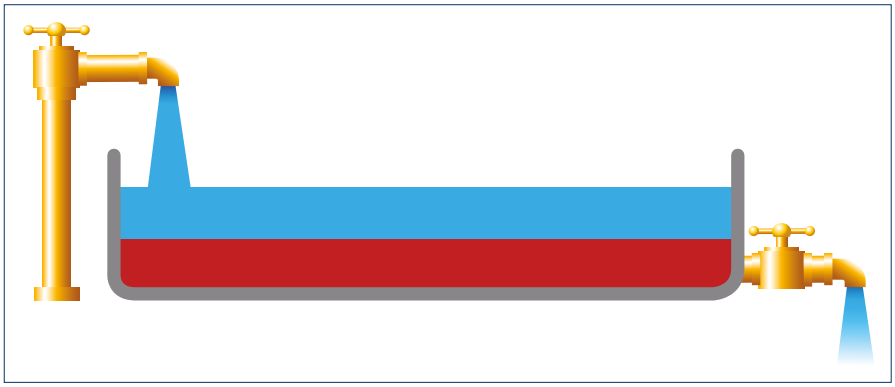

Figure 7: The CABERNET Brownfield Bath Model taken from the Sustainable Brownfield Regeneration – CABERNET Network Report, 2006 (Figure 4.1) – Showing the filling and emptying of the bath.

CABERNET suggest that there will always be a flow of new brownfield lands as sites change use, however, the overall cycle should be such that there is a steady flow of sites into and out of the bath in equal volumes.

Figure 8: The CABERNET Brownfield Bath Model taken from the Sustainable Brownfield Regeneration – CABERNET Network Report, 2006 (Figure 4.4) – Showing optimal brownfield flow.

Based on the literature reviewed for this report, there are many examples of countries and interested bodies who have implemented measures to address their brownfield challenges. These informed the report findings and conclusions in this report (see Sections 10 and 11).

Section 7.0

Case Study Analysis

7.0 Case Study Analysis

7.1 Case Studies

This section presents analysis of the four case studies selected as outlined in Section 4 – Methodology. Each case study is reviewed individually without comparisons or reconciliations as each project is unique and of varying scales and complexity. An identical approach is adopted for each whereby an overview of the project is provided along with the project's key characteristics. Each case study is reviewed under three main headings, which are:

- Legal and Regulatory;
- Economic and Financial; and
- Social and Cultural.

Under each heading, a series of questions was responded to which allows a greater understanding of how the project has reached its current status. Each section concludes with a narrative on any other factors, findings and learnings.

7.2 Case Study 1 Emmet Road Redevelopment

The project known as the Emmet Road redevelopment is a circa 3.8 hectare site located in Dublin 8. The site is the location of the former St. Michael's Estate housing development, which was constructed in the 1970s and subsequently demolished in the late 2000s. Since completion of the demolition, the site has remained largely a vacant brownfield site with some social and community facilities to the north of the site, that are yet to be demolished, forming part of the redevelopment. In addition, the Inchicore Community Sports Centre, which will remain in place, is located on the eastern edge of the site.

The proposed mixed-use development includes 578 apartments (282no. one bed, 250no. two bed and 46no. three bed), community facilities, community library, crèche, supermarket, smaller retail units and a public plaza. The project received planning consent in July 2023 with construction works expected to commence in late 2024/early 2025.

7.2.1 Site Characteristics

The site is relatively flat and is surrounded on three sides by public roadways and Goldenbridge Cemetery to the south.

The site originally formed part of the Richmond Barracks (since 1814) before it was handed over to Dublin Corporation (now Dublin City Council). The north-western corner of the site is delineated by a section of historic walling which previously formed the boundary of the barracks. This wall is a protected structure.

Based on initial surveys, contaminated soil has been identified on the site. The nature and full extent remain unknown until further surveys and soil testing are carried out at a later date.

The site has a combination of constraints, which were a consideration during the pre-planning design stages. These constraints have been factored into the final design, programme and budget and will be managed as the project moves forward to detailed design and construction. A summary of the site characteristics is provided below.

Case Study 1 - Emmet Road Development

Site Characteristics	
Type of site:	Brownfield/Urban regeneration.
Site area (hectares):	4.6 hectares including Uisce Éireann watermain upgrade (3.8 hectares excluding Uisce Éireann mains).
Brief description of existing site condition:	There is a mixture of single storey existing buildings, existing hard landscaped areas and existing brownfield space. The site was the location of the former St. Michael's Estate (Dublin City Council social housing accommodation) to the south, now demolished. Existing social and community facilities to the north of the site were/are to be demolished. The site is generally flat with no major level changes.
Brief description of existing structures (if applicable):	Historic stone boundary wall to north and northwest perimeter to be partially removed and re-built. Community centre- to be demolished. Health Service Executive (HSE) Health Centre- to be demolished. Existing sports community building- to be retained.
Are any existing structures retained?	Historic stone boundary wall along the north and north-west perimeter is a protected structure to be retained and the existing sports community building will also be retained.
Site constraints (other than noted above):	Richmond Barracks to the east of the site is a protected structure not to be impacted by the project. Goldenbridge Cemetery to the south of the site.
Site abnormals (other than noted above):	Extensive soil contamination on the site. Off site public watermain upgrade, circa 200m.
Any built or natural heritage elements?	Heritage stone wall noted above.
Any other notes on the site condition?	None.

7.2.2 Legal and Regulatory

A summary of the legal and regulatory environment applicable to the site is set out hereunder.

Case Study 1 - Emmet Road Development

Legal and Regulatory	Does the existence of masterplans or development briefs within development plans/Local Area Plans hinder or help the development moving forward?	When the planning design was being developed, the current Dublin City Development Plan was in draft. The planning design complied with the Strategic Development Regeneration Area (SDRA) regeneration objectives for these lands as set out in the 2016 Dublin City Development Plan (the relevant plan at the time).
	Does the site have any zoning objectives or specific policies?	The site is zoned Z14 i.e. to seek social, economic and physical development and/or regeneration of an area with mixed use, of which residential would be the prominent use.
	Did Section 28 policy guidance or local level policy impact and/or influence the development? Example - requirement for a crèche, car parking standards, active street frontage, etc.	Yes. The SDRA regeneration objective required: - a mixed-use urban quarter; - active street frontage; - an extension of the village eastwards; - strong permeability north-south and east-west with active streetscapes on both routes; - to highlight through design the adjoining heritage buildings; - to provide community and sports facilities; and - inclusion of senior citizen housing.
	Did the Development Contribution Scheme (S48) and Special Contribution Scheme (S49) help or hinder in activating the site?	The project is not subject to Section 48 Contributions as it falls into the Social and Affordable Housing category.
	Has the project been subject to any legal barriers (i.e. land ownership, boundaries, Right of Way, etc.)?	Not to date. Letters of consent were obtained prior to the submission of the planning application.
	If so, what level of impact did these issues have on the time, cost and quality?	Not applicable.
	Did any policy differentiate this site from a typical greenfield site (i.e. what was different compared to if this project was built on a greenfield site)?	Yes, the 2016 Dublin City Development Plan specifically designated this location as a Strategic Development Regeneration Area (SDRA). The brownfield nature of the development means it benefits from proximity to public services, shops, public transport etc. in an already established community.

Case Study 1 - Emmet Road Development		
Legal and Regulatory	Example of how existing policy benefitted the project to get to its current stage:	The SDRAs are defined as areas that are capable of delivering a significant quantum of redevelopment, giving policy support and recognition that this area was suitable for sustainable compact urban development.
	Did state bodies help/ hinder the delivery of the project including the various statutory consultees in the planning application process and/or at pre-planning, land-ownership, funding or utilities?	No. The new development requires an upgrade to an Uisce Éireann watermain outside the site boundary.
	Any other legal/regulatory challenges and/or enablers on this project?	No.

7.2.3 Economic and Financial

The economic and financial performance of any project is heavily influenced by internal factors (site characteristics, design, etc.) and external factors (material and labour costs, interest rates, funding, etc.). The development budget for this redevelopment project has to account for a number of site specific considerations including: contamination on the site and the upgrade of an Uisce Éireann watermain outside the site boundary. As this is a cost rental residential development, the project benefits from financial subvention under the Cost Rental Subvention Fund without which the project would not be viable. Section 48 Development Contributions are also waived as the project is classified as Social and Affordable (Purchase and Cost Rental) housing under the Dublin City Council Development Plan.

Case Study 1 - Emmet Road Development		
Economic and Financial	What are the biggest project abnormals on a financial level?	Ground contamination. Uisce Éireann watermain upgrade circa 200m from the site boundary.
	Does the project sponsor/ developer benefit from any subsidy to assist with this?	No.
	Does the project benefit from any subsidies/incentives?	This is a cost rental development which benefits from Affordable Housing Fund (AHF) local authority cost rental subvention.
	If so, would the project be viable without these subsidies?	No.
	Does the project benefit from any financial subsidy or incentive which would not be applicable to an equivalent greenfield site?	No. (Note- No Section 48 development contributions will be paid; but this applies to any development by an Approved Housing Body (AHB) - whether on green or brownfield site).
	If so, please explain:	Not applicable.

7.2.4 Social and Cultural

The site plays an important social and cultural role in the local community. Retaining and enhancing local community facilities is a key aspect of the redevelopment. The provision of a new community library will complement the existing community sports building. The site has been subject to anti-social behaviour and the intention is that the new development will address this issue and provide a catalyst for the regeneration of neighbouring areas.

Case Study 1 - Emmet Road Development		
Social and Cultural	Did the brownfield site/adjacent lands have any social issues prior to this development?	Yes, the site is subject to high levels of anti-social behaviour.
	To what degree will the project impact on the immediate area in a social or cultural sense? (Low, Medium, High). Please explain:	High and positive impact. New public amenities will be provided for new residents and the existing local community.
	Did the project incorporate any special community engagement mechanisms to assist in the delivery?	Stakeholder engagement took place with a local group i.e. Inchicore Regenerative Consultative Forum.
	Was this required/should this be mandatory and what was the impact on delivery (positive/ negative experience)?	This was not mandatory but it was encouraged. It allowed the group feed into the design at an early stage. The project is still in the detailed design stage hence any impact on the construction stage remains to be seen.
	Generally is the local community in support of the project or otherwise?	Yes they are supportive.
	Please elaborate:	The site has been idle for many years and the redevelopment will provide a stimulus to the local community with supermarket, library and other community amenities being provided, together with much needed affordable housing.

7.2.5 Further Considerations

Aside from the current redevelopment, demolition works were completed on the site in the late 2000s. A Public/Private Partnership (PPP) arrangement with a private developer was in place with works due to commence in 2008. The market-led nature of the PPP model rendered the regeneration of the site dependent on housing market projections. Due to the global financial crash and the fall in property values, the project did not progress.

After remaining dormant for a number of years, Dublin City Council decided to progress with the project directly. This was against the backdrop of a post-recession recovery and a growing demand for quality affordable housing. The current redevelopment received planning consent in July 2023 and is currently progressing through detailed design.

7.2.6 Summary of Findings

The proposed redevelopment of the former St. Michael's Estate site on Emmett Road is a large urban brownfield land activation project. The site has many challenges which vary from existing buildings, soil contamination, heritage (protected) structures as well as the requirement for off-site infrastructure improvements. Many of these challenges come at a time and financial premium, which together with risks associated with inflation, must be factored into the project from the outset. These challenges, coupled with external factors such as the global financial crash, have resulted in this site remaining undeveloped for nearly 20 years. The project is a cost rental scheme and qualifies for the Affordable Housing Fund (AHF) subvention which is critical to the project viability. This subvention would not be directly available to a private sector developer.

The new development will provide a social and economic stimulus to the local community by the creation of a vibrant and sustainable community in what was previously a location which experienced significant anti-social behaviour. The site is well serviced and fits within the existing local community services and infrastructure.

7.3 Case Study 2
Richmond Avenue

This site at 15 Richmond Avenue, Dublin 3 was the location of a car repair facility. It was an underused site comprising a two storey warehouse and low quality shed buildings.

This is a development which has been undertaken by an Approved Housing Body (AHB), Focus Housing Association, and includes the construction of 35 residential apartments comprising 19 one bedroom and 16 two bedroom homes, split across two blocks. The development also includes 224m^2 of communal open space and associated hard and soft landscaping. The total site area is circa 914m^2. Construction works are currently on-going with a target completion in early 2025.

7.3.1 Site Characteristics

The site is a tight urban location which is surrounded on three sides by other properties with access only from Richmond Avenue. The proximity of adjoining properties, particularly the proximity of foundations, was a key consideration during the initial feasibility stages.

Until recently the site was used as a car repair facility with a mix of existing warehouse and smaller shed buildings. The existing warehouse covered the majority of the site and was constructed of a combination of in-situ and precast concrete. The roof was single sheet asbestos on steel purlins. All existing structures were demolished to facilitate the redevelopment. There was contaminated soil on the site, which was largely related to the underground oil tanks.

Construction logistics, including the flow of construction traffic and the location of the site compound and cabins were considered as part of the design development process.

Case Study 2 - Richmond Avenue

Site Characteristics

Type of site:	Brownfield site previously used as a car repair garage.
Site area (hectares):	0.09 hectares.
Brief description of existing site condition:	Two storey warehouse and shed buildings. The soil conditions consisted of made ground with fill which is underpinned by layers of gravel on clay.
Brief description of existing structures (if applicable):	The structures used as a motor repair garage covered the majority of the site and were constructed of a precast concrete portal frame with an in-situ concrete ground floor slab and precast first floor. The roof was single sheet asbestos on steel purlins.
Are any existing structures retained?	No existing structures were retained.
Site constraints (other than noted above):	The site is constrained for construction traffic with restricted public road access for concrete trucks and deliveries on Richmond Avenue. The site is also constrained for a builders compound and site cabins. An unused adjoining site has been used by the main contractor.
Site abnormals (other than noted above):	Contaminated soil in the made ground and Japanese knotweed to be removed from the site.
Any built or natural heritage elements?	No built or natural heritage elements on the site.
Any other notes on the site condition?	Due to the brownfield nature of the site at the edge of the inner city, adjoining buildings restrict construction activities. Particularly regarding proximity of foundations with underpinning of existing adjoining structures and boundaries potentially required.

7.3.2 Legal and Regulatory

The site was zoned Z10 in the Dublin City Development Plan 2016-2022. This zoning objective supports residential development. Private car parking was not a requirement and does not form part of the proposed development. To date, no legal or regulatory issues have been experienced.

Case Study 2 - Richmond Avenue

Legal and Regulatory

Does the existence of masterplans or development briefs within development plans/Local Area Plans hinder or help the development moving forward?	The site was not subject to a Local Area Plan or Masterplan but the redevelopment was supported by the applicable zoning objective in the Dublin City Development Plan.
Does the site have any zoning objectives or specific policies?	The site is zoned Z10 which is to: *"consolidate and facilitate the development of inner city and inner suburban sites for mixed-uses, with residential the predominant use in suburban locations, and office/retail/residential the predominant uses in inner city areas".*
Did Section 28 policy guidance or local level policy impact and/or influence the development? Example - requirement for a crèche, car parking standards, active street frontage, etc.	Due to Richmond Avenue not being a commercial street, commercial uses or active street frontage were not planning requirements. Likewise, the policy did not require on-site car parking provision, which allowed for increased residential development on the site.
Did the Development Contribution Scheme (S48) and Special Contribution Scheme (S49) help or hinder in activating the site?	No. Because it is an Approved Housing Body development Section 48 and Section 49 Development Contributions are waived by the local authority.
Has the project been subject to any legal barriers (i.e. land ownership, boundaries, Right of Way, etc.)?	No.
If so, what level of impact did these issues have on the time, cost and quality?	Not applicable.
Did any policy differentiate this site from a typical greenfield site (i.e. what was different compared to if this project was built on a greenfield site)?	The brownfield nature of the development means it benefits from proximity to public services, shops, public transport etc. in the already established community of Fairview.
Example of how existing policy benefitted the project to get to its current stage:	The planners were very supportive of the development given the re-use of a brownfield site and the fact that it complies with the zoning objective.

Case Study 2 - Richmond Avenue		
Legal and Regulatory	Did state bodies help/hinder the delivery of the project including the various statutory consultees in the planning application process and/or at pre-planning, land-ownership, funding or utilities?	There was extensive pre-application consultation with the Planning Department in the local authority that resolved the significant issues prior to lodgement of the planning application. A clear and directive additional information request was dealt with swiftly and led to an uncontentious grant of planning permission. The local authority's Housing Department was proactive and supported the AHB to provide social housing enabling it to obtain the required funding from the Housing Finance Agency (HFA).
	Any other legal/regulatory challenges and/or enablers on this project?	No.

7.3.3 Economic and Financial

There were financial risks associated with this project, which had to be considered in the context of the overall project viability. Whilst the project does not benefit from any particular state initiative or subsidy, it does benefit from government funding, as the site is being developed by Focus Housing Association. The housing association is an Approved Housing Body and could therefore avail of Housing Finance Agency Funding to develop the site which ensured the viability of the project. In addition, the project is exempt from development contributions.

Case Study 2 - Richmond Avenue		
Economic and Financial	What are the biggest project abnormals on a financial level?	Contaminated soil to be disposed of and treatment of Japanese knotweed.
	Does the project sponsor/ developer benefit from any subsidy to assist with this?	No.
	Does the project benefit from any subsidies/incentives?	No.
	If so, would the project be viable without these subsidies?	Not applicable.
	Does the project benefit from any financial subsidy or incentive which would not be applicable to an equivalent greenfield site?	No.
	If so, please explain:	Not applicable.

7.3.4 Social and Cultural

Whilst part of the site was in use until recently, the immediate area has experienced dereliction in recent years. The development is expected to reduce the volume of car movements in the area, provide a modern vibrant building to the community together with much needed residential units. Overall, the local community were in support of the development.

Case Study 2 - Richmond Avenue

Social and Cultural	
Did the brownfield site/adjacent lands have any social issues prior to this development?	No. The site was in use until recently. However, some adjoining/adjacent sites, in this predominantly residential area, have suffered from dereliction over many years.
To what degree will the project impact on the immediate area in a social or cultural sense? (Low, Medium, High). Please explain:	The development will have a high social benefit to the area, with the planning gain of developing a new modern apartment building to replace a poor quality motor repair garage building located in a residential area. The development reduces car/vehicle movements and on-street parking that were created by the motor repair garage use and will add an additional sense of community to Richmond Avenue.
Did the project incorporate any special community engagement mechanisms to assist in the delivery?	No.
Was this required/should this be mandatory and what was the impact on delivery (positive/ negative experience)?	Not applicable.
Generally is the local community in support of the project or otherwise?	Yes.
Please elaborate:	The local community is supportive of the development which can be demonstrated by the fact that no observations/objections were submitted on the planning application file.

7.3.5 Summary of Findings

The site at 15 Richmond Avenue is representative of the nature and scale of many underused brownfield sites which exist across Ireland's towns and villages. Albeit in use until recently, the existing structures were coming to the end of their useful lifespan.

The permitted development faced some challenges to meet all of the development standards in terms of site coverage and daylight/sunlight requirements. However, as described above, the development team had positive engagement with the local planning department which took account of the challenges and constraints of the tight urban site.

Through engagement at the pre-application stage, the site constraints, design rationale and mitigation measures were understood and agreed, with the planning authority. The time invested at that stage enabled the application process to be streamlined.

With the location being predominately residential, there was a strong case for developing a modern apartment building, that enhances the streetscape aesthetics and sense of community. The site fits into the existing physical infrastructure and community services.

Public engagement, in this instance, was limited to the standard planning application process which can be sufficient for smaller scale developments, however, proportionality is key. On larger developments, like Emmet Road, there is a need for early community engagement to limit the risk of issues arising at a later date.

There was proactive and positive engagement with the local authority in the pre-application stages. There was also strong policy support for this type of development in the development plan.

Similar to Emmet Road, the development benefited from state financial intervention through the Approved Housing Body. Without this financial support, issues with the viability of the project would have arisen.

7.4 Case Study 3
St. Kevin's Redevelopment

The St. Kevin's redevelopment involves the urban regeneration of a landmark site located circa 2.5km west of Cork City centre on a prominent site. The St. Kevin's Hospital and associated buildings were part of a campus known as Our Lady's Hospital, which was a mental health institution built in the 1840s.

The complex was made up of a number of major buildings, Our Lady's, and St Bridget's -which only closed in the early 1990s. The St. Kevin's Hospital was built in 1893 as an eastern annex to the Our Lady's Hospital complex and originally accommodated 490 patients in dormitories. It is one of the largest remaining structures on the site, and it still dominates the skyline. St. Kevin's Hospital was decommissioned in 2002. The buildings remained in the Health Service Executive (HSE) ownership and have been empty and tending towards dereliction over the last circa 20 years. In 2017, the prominent red-brick structure of St. Kevin's suffered a devastating fire when two thirds of the structure was destroyed.

The site formally transferred to the Land Development Agency (LDA) in 2023 and is being developed as a strategic site for residential development. The new development will provide circa 265 residential units with a crèche and enterprise facility. The regeneration is taking advantage of its south facing steeply sloping topography and views over the River Lee and Cork City. The redevelopment is split into phases. Construction has commenced on Phase One.

7.4.1 Site Characteristics

The south facing site is a prominent feature overlooking Cork City with steeply sloping topography. Extensive Uisce Éireann services traverse the site and Japanese knotweed is also present on the site.

There are over 8,000m^2 of existing buildings on the site including a number of protected structures. All buildings are in a state of disrepair and dilapidation. The exteriors of the buildings that are preserved are secure and intact, but the interiors are significantly neglected. The structures, that are protected and to be retained, include the St. Kevin's Hospital Building, Chapel and Link Corridor.

Case Study 3 - St. Kevin's

Site Characteristics	
Type of site:	Brownfield/Urban regeneration on landmark site located 2.5km west of Cork City centre on a prominent south facing hillside site.
Site area (hectares):	5.7 hectares.
Brief description of existing site condition:	Steeply sloping site topography necessitating the use of retaining walls and split-level architecture; extensive Uisce Eireann services traversing site - serving Cork City; significant amount of Japanese knotweed throughout the site; single access point to the site.
Brief description of existing structures (if applicable):	The notable existing structures include: St. Kevin's Hospital Building (5,503m^2 which is a protected structure RPS Ref. PS620), the Chapel (630m^2), the Link Corridor (320m^2), St. Dympna's Hospital Block (1,129m^2), the former Doctor's House (220m^2), the Mortuary (50m^2) and a number of smaller outbuildings, totalling approximately 8,300m^2. All of the buildings are in a state of disrepair and dilapidation. The exteriors of the buildings that are preserved are secure and intact, but the interiors are significantly neglected.
Are any existing structures retained?	Yes. The existing St. Kevin's hospital building, the Chapel and the Link Corridor walls on the site (all listed structures protected).
Site constraints (other than noted above):	Landscape protection, significant wayleaves and existing internal road network were challenging in terms of incline and Design Manual for Urban Roads and Streets (DMURS) requirements.
Site abnormals (other than noted above):	Not applicable.
Any built or natural heritage elements?	St. Kevin's Hospital, the Chapel and the Link Corridor are protected structures.
Any other notes on the site condition?	Not applicable.

7.4.2 Legal and Regulatory

The site remained largely vacant and derelict for 20 years and is a prominent site overlooking Cork City. In the Cork City Development Plan 2015-2021, the site was zoned as *"Residential, Local Services and Institutional Uses"* with a southern section of the site designated as a *"Landscape Preservation Zone"*. The site is also located in an area that is designated as an *"Area of High Landscape Value"*. The St. Kevin's Hospital is a local landmark with protected views from the south. The zoning requirements were a key consideration in the initial design stages.

Ownership of the site was transferred from the HSE to the LDA and no issues or barriers were encountered. The project has a number of statutory wayleaves, which were accounted for in the site layout.

Case Study 3 - St. Kevin's

Legal and Regulatory	
Does the existence of masterplans or development briefs within development plans/Local Area Plans hinder or help the development moving forward?	The Cork City Development Plan provided the basis on which the local authority set their expectations for the site and helped the LDA to form a development brief which aims to match it with the LDA's aspirations.
Does the site have any zoning objectives or specific policies?	The zoning objectives of the site are *"Institutional Lands"* and a *"Landscape Preservation Zone"*. The Institutional lands are being developed in line with the LDA's mandate to deliver social and affordable homes in Cork City, whilst the Landscape Preservation Zone is being respected and incorporated as public open space within the development.
Did Section 28 policy guidance or local level policy impact and/or influence the development? Example - requirement for a crèche, car parking standards, active street frontage, etc.	Crèche and Enterprise space was incorporated into the scheme.
Did the Development Contribution Scheme (S48) and Special Contribution Scheme (S49) help or hinder in activating the site?	The site is not subject to Section 49 Development Contributions. The temporary waiver of Section 48 Development Contributions, under Circular PL08/2023, was applicable to Phase One (97 homes) and significantly benefitted the scheme. The waiver applied to developments that started between 25 April 2023 and 24 April 2024, and completed not later than 31 December 2025. The Cork City Council 2023-2029 Development Contribution Scheme now exempts lands that are subject to Part 9 of the LDA Act 2021.
Has the project been subject to any legal barriers (i.e. land ownership, boundaries, Right of Way, etc.)?	No legal barriers were identified as part of the LDA's site title review. There exists a number of statutory wayleaves on the site, which have been accommodated in the site layout and roads drawings.
If so, what level of impact did these issues have on the time, cost and quality?	Significant Uisce Éireann infrastructure precluded development on 50% of the site, until such time as upgrade works have been completed. Works on the eastern part of the site can only commence in Q2 2024.

Case Study 3 - St. Kevin's		
Legal and Regulatory	Did any policy differentiate this site from a typical greenfield site (i.e. what was different compared to if this project was built on a greenfield site)?	The extent of project abnormals on the site (e.g. sloping topography, protected structures, invasive species, existing underground service, etc.) and its previous site use (e.g. psychiatric hospital).
	Example of how existing policy benefitted the project to get to its current stage:	Existing policy identified the site for urban regeneration, whilst maintaining protected views of the St. Kevin's Hospital structure, the façade of the fire damaged building had to be incorporated into the new apartment block to be constructed here.
	Did state bodies help/ hinder the delivery of the project including the various statutory consultees in the planning application process and/or at pre-planning, land-ownership, funding or utilities?	Development was a collaborative approach between all key stakeholders to activate this landmark site for much needed homes in Cork City.
	Any other legal/regulatory challenges and/or enablers on this project?	No legal or regulatory challenges or enablers identified as part of this project.

7.4.3 Economic and Financial

The project has a number of abnormals and challenges which are largely identified in the site characteristics detailed in Section 7.4.1 above. Stabilisation and retention of protected structures, repurposing existing structures, treatment of Japanese knotweed, retaining structures and services diversions are the main abnormal financial costs which the project has to account for.

Other factors such as a single point of access and construction activities on a steeply sloping site can present challenges and result in a cost premium.

The project benefits from state funding under the Affordable Housing Fund (AHF) and Secure Tenancy Affordable Rental Investment Scheme. It also benefits from the waiver for Section 48 Development Contributions and would not be viable without these initiatives.

Case Study 3 - St. Kevin's

Economic and Financial	What are the biggest project abnormals on a financial level?	There are a number of financial abnormals in this development. The restabilisation and retention of the St. Kevin's hospital building (RPS Ref. PS620) is the most significant. Other abnormal financial costs include: treatment and disposal of Japanese knotweed; the implementation of retaining structures across the site to provide level development areas; the redirection of existing services across the site (watermain etc); and the detailed repurposing and preservation of other significant existing structures (Chapel and Link Corridor).
	Does the project sponsor/ developer benefit from any subsidy to assist with this?	No.
	Does the project benefit from any subsidies/incentives?	Yes. The project benefits from the Affordable Housing Fund and Secure Tenancy Affordable Rental Investment Scheme.
	If so, would the project be viable without these subsidies?	No. Even taking account of these subsidies/ incentives, the viability of the development is very challenging.
	Does the project benefit from any financial subsidy or incentive which would not be applicable to an equivalent greenfield site?	No.
	If so, please explain:	Not applicable.

7.4.4 Social and Cultural

In the period since the closure of St. Kevin's Hospital in 2002, the site has experienced anti-social behaviour. The combination of activating a prominent derelict site and delivering much-needed affordable homes was generally well received with positive engagement from the local community.

Case Study 3 - St. Kevin's		
Social and Cultural	Did the brownfield site/adjacent lands have any social issues prior to this development?	Yes. Previous use was by HSE for a psychiatric hospital. The site had also experienced anti-social behaviour.
	To what degree will the project impact on the immediate area in a social or cultural sense? (Low, Medium, High). Please explain:	High impact. Delivery of affordable homes on a landmark site overlooking Cork City. The site and associated existing buildings had been in a state of dilapidation prior to acquisition by the LDA.
	Did the project incorporate any special community engagement mechanisms to assist in the delivery?	Yes. Community engagement was carried out with the various stakeholders and local community.
	Was this required/should this be mandatory and what was the impact on delivery (positive/ negative experience)?	Not required but the LDA consider community engagement as a key function/requirement in the delivery of all LDA schemes. Positive impact from Cork community that this landmark site overlooking Cork City will now be regenerated to provide well-needed affordable homes to the community.
	Generally is the local community in support of the project or otherwise?	Yes. Site in existing form was derelict prior to the regeneration of the site into social and affordable homes for Cork City.
	Please elaborate:	As above.

7.4.5 Summary of Findings

St. Kevin's redevelopment is a major brownfield activation that has a range of challenges. These challenges are varied in nature and would have been a factor for the site remaining idle for many years. With large parts of the site sterilised due to the existence of live utilities, the Masterplan required careful planning and consideration. The Affordable Housing Fund subvention is critical to the project viability and one of the main enablers allowing the LDA to progress with the development of the site.

The new development makes the most of existing services within and surrounding the site and thus complements the existing social infrastructure.

The new development is expected to provide a positive social and economic stimulus to the local community by the creation of a vibrant and sustainable community in what was previously a location that experienced anti-social behaviour. The site is positioned on a prominent site overlooking Cork City and will be a major landmark when complete.

7.5 Case Study 4 Mayfair Library

The development of Mayfair Library involved the conversion and extension of the Mayfair Hall on the former Smithwick's Brewery site in Kilkenny City. The building was originally constructed as the Mayfair ballroom, which opened in 1943 and continued until its closure in 1973. The building had a number of subsequent uses with its most recent use being as an office and welfare facilities for the Smithwick's Brewery. The building is located in the former Smithwick's Brewery site, which was purchased by Kilkenny County Council from Diageo when they decided to centralise their production facilities in the St. James' Gate Brewery in Dublin City.

Mayfair Hall is part of the wider Abbey Quarter Masterplan and was renovated and extended for reuse as the City Library. The new City Library, extending to 1,800m^2 was formally opened in April 2024.

7.5.1 Site Characteristics

The Mayfair Hall is located within the City Centre Architectural Conservation Area (ACA) and is within a zone of Archaeological Potential. It is located in close proximity to the City Walls and St. Francis Abbey, both of which are National Monuments. In addition, the site is immediately adjoining the River Nore.

The former industrial use also posed some contamination risks as there was asbestos on the site, which had to be removed.

The works included demolition of portions of the existing building including works in close proximity to the adjoining City Walls which is a national monument, construction of a new two-storey extension of approximately 880m^2 and construction of a public urban square on the site.

Case Study 4 - Mayfair Library

Site Characteristics	
Type of site:	Existing unused building, located within a former brewery (industrial) site.
Site area (hectares):	The building sits within the former brewery site which measures approximately 4.41 hectares.
Brief description of existing site condition:	Former brewery/industrial site. Brewery buildings were demolished as part of the decommissioning of the brewery, with the exception of the Brewhouse (recently renovated for office use) and the Mayfair Hall (offices/welfare) which has been redeveloped for library use. The other buildings were demolished to ground floor slab level. The site also incorporates St. Francis Abbey (a national monument) and the City Walls (also a national monument).
Brief description of existing structures (if applicable):	The Mayfair Hall is an existing building which is largely retained as part of the redevelopment. The wider Abbey Quarter site includes various buildings and structures including a new recently renovated building for office use. As noted above, the site includes St. Francis Abbey and the City Walls, both national monuments, which are in close proximity to the Mayfair Hall.
Are any existing structures retained?	Mayfair Hall is largely retained and the national monuments which are close by are also retained.
Site constraints (other than noted above):	Works to be completed in an existing building which is largely retained. Proximity to River Nore and national monuments.
Site abnormals (other than noted above):	Site is immediately adjoining the River Nore (Special Area of Conservation (SAC)/Special Protection Area (SPA). It is located in a zone of Archaeological Potential. Former industrial use also puts environmental constraints on the site.
Any built or natural heritage elements?	National monuments noted above.
Any other notes on the site condition?	No.

7.5.2 Legal and Regulatory

The initial Masterplan, known as the Abbey Quarter Masterplan, was subject to extensive public consultation prior to its adoption in 2015. The adoption of the Masterplan paved the way to the redevelopment of the site.

The challenges posed related to the proximity of the development to the national monuments and the necessity to engage with the National Monuments Service (NMS). This engagement focused mainly on the proposed works and the adopted construction methodologies.

Case Study 4 - Mayfair Library

Legal and Regulatory	Does the existence of masterplans or development briefs within development plans/Local Area Plans hinder or help the development moving forward?	There was a Masterplan in place for the development i.e. the Abbey Quarter Masterplan. This was a very significant help in advancing the development as it put a structure to the plans for the development of the former brewery site. The Masterplan was the subject of extensive public consultations, with the Masterplan being adopted in 2015. In 2023, the Masterplan was reviewed to bring it up to date with changes in legislation/policy since it was first adopted.
	Does the site have any zoning objectives or specific policies?	The site is zoned for General Business use. The Masterplan has a targeted mix of uses for the site: Commercial 15%; Retail, Food, Beverage 20%; Residential 35% - there is flexibility on the remaining 30%.
	Did Section 28 policy guidance or local level policy impact and/or influence the development? Example - requirement for a crèche, car parking standards, active street frontage, etc.	The Abbey Quarter Masterplan and the associated Urban Design Code supported the idea of a civic cultural facility on the site. The library use is consistent with this objective of the Masterplan. The area was originally called the Abbey Creative Quarter, but the word creative was dropped as it was considered that this was too restrictive in terms of uses, but the policy objective remained to facilitate creative uses such as the library.
	Did the Development Contribution Scheme (S48) and Special Contribution Scheme (S49) help or hinder in activating the site?	Not applicable. The redevelopment of the Mayfair Hall for library use is a local authority development.
	Has the project been subject to any legal barriers (i.e. land ownership, boundaries, Right of Way, etc.)?	No. The lands for the Masterplan were purchased by the local authority.
	If so, what level of impact did these issues have on the time, cost and quality?	Not applicable.
	Did any policy differentiate this site from a typical greenfield site (i.e. what was different compared to if this project was built on a greenfield site)?	No. The preference to redevelop an existing building within the city centre over and above the development of a new building on the periphery of the city aligned with the general policy of Town Centre First (TCF). By bringing library users into the city centre, it increases activity in the city centre, thereby assisting local businesses to survive and hopefully thrive.

Case Study 4 - Mayfair Library		
Legal and Regulatory	Example of how existing policy benefitted the project to get to its current stage:	None.
	Did state bodies help/ hinder the delivery of the project including the various statutory consultees in the planning application process and/or at pre-planning, land-ownership, funding or utilities?	The location of the building, immediately adjoining the City Walls resulted in extensive consultations with the National Monuments Service in relation to the plans for the development and the construction methodologies.
	Any other legal/regulatory challenges and/or enablers on this project?	None.

7.5.3 Economic and Financial

As described in the site characteristics in Section 7.5.1 above, the project had a number of challenges which had a financial impact. In advance of commencing the main works, archaeological surveys and investigations had to be carried out. There was also asbestos in the existing building which had to be managed and disposed of in accordance with the Health and Safety regulations.

The added constraints of the proximity of the development to the River Nore Special Area of Conservation (SAC) and the National Monuments required careful consideration from an initial budgeting perspective.

The project benefitted from state funding under the Libraries Capital Programme and was exempt from development contributions. The wider masterplan benefitted from the URDF and the European Regional Development Fund (ERDF) funding which allowed the supporting infrastructure, including a one hectare public park immediately adjacent, around the Mayfair Library to be progressed.

Case Study 4 - Mayfair Library

Economic and Financial		
	What are the biggest project abnormals on a financial level?	Archaeological requirements at the beginning and dealing with the presence of hazardous materials (i.e. asbestos).
	Does the project sponsor/ developer benefit from any subsidy to assist with this?	Not directly but see below in relation to funding.
	Does the project benefit from any subsidies/incentives?	The project was subject to 70% state funding through the Libraries Capital Programme.
	If so, would the project be viable without these subsidies?	No.
	Does the project benefit from any financial subsidy or incentive which would not be applicable to an equivalent greenfield site?	Yes.
	If so, please explain:	The infrastructure associated with the Masterplan was part-funded through the URDF and ERDF funding through the Designated Urban Grant Scheme, which was targeted at urban regeneration projects.

7.5.4 Social and Cultural

The new library is a small part of the overall Abbey Quarter Masterplan which was dominated by the former brewery use. The new library will bring users into the city centre and will thus increase activity and support local businesses. The Masterplan went through an extensive public consultation process which afforded all members of the public the opportunity to comment and/or put forward proposals. Hence there was a natural community engagement and therefore social cohesion in how the Masterplan was developed. Overall in terms of local support, the project and Masterplan is well received having gone through the public consultation process.

Case Study 4 - Mayfair Library

Social and Cultural	Did the brownfield site/adjacent lands have any social issues prior to this development?	Generally no. The Mayfair Hall is embedded in the Masterplan which had works progressing thus a deterrent for anti-social behaviour.
	To what degree will the project impact on the immediate area in a social or cultural sense? (Low, Medium, High). Please explain:	High. This area of the city was dominated by the former brewery use of the site. The current change in use will generate a greater use of the area by the general public bringing significant footfall to the area. The former brewery site is being redeveloped with a mix of public realm areas and buildings, with the mix of uses intended to generate activity on the site seven days a week. The proposed urban park (1 hectare) that is immediately adjoining the library will generate significant public activity in the area.
	Did the project incorporate any special community engagement mechanisms to assist in the delivery?	Extensive public consultations, in addition to any statutory planning consultations. Informal consultations by way of weekend workshops where members of the public were invited to put forward proposals for how they would like to see the site be developed. There were follow-up workshops with interested parties to advise them of any intended outcomes from previous consultations etc., before they were formalised. All consultations in relation to the development were undertaken through an online public consultation portal where once someone has registered they were automatically advised of any current consultations.
	Was this required/should this be mandatory and what was the impact on delivery (positive/ negative experience)?	Not at this stage. Previously the focus had always been on statutory consultations once plans had been formalised. The current process allows members of the public to engage early in the development process. Generally considered to be a very positive experience.
	Generally is the local community in support of the project or otherwise?	Generally yes.
	Please elaborate:	There was a small number of very vocal objectors in the first stages of the project- this was a spill over from protests in relation to the development of a controversial bridge in the adjoining area. This has now been replaced by general positivity now that the public can see the quality of the overall development.

7.5.5 Summary of Findings

The Mayfair Hall sits within the former brewery site in Kilkenny. It is one of only two buildings on the 4.41 hectare site which were not demolished and retained for repurposing. Its heritage as a former ballroom and proximity to national monuments and national conservation areas were part of the reason for retaining the existing structure. The aforementioned characteristics as well as the presence of contamination in the building fabric posed challenges to the repurposing.

The site, located in the heart of Kilkenny City, provides a good example of how older buildings can be brought back to life to serve the community. No additional physical infrastructure (i.e. roads, water, power) was required to accommodate the development as it tied into the existing networks. The project benefitted from funding under the Libraries Capital Programme which would have been the case whether on a brownfield or greenfield site.

Section 8.0

In-depth Interviews

8.0 In-depth Interviews

8.1 Introduction

This section details the findings from the in-depth interviews. The interviews offered an opportunity to examine the complicated aspects of brownfield land activation and to facilitate the gathering of detailed information from individuals involved in various stages of brownfield redevelopment. The interviews were semi-structured and the findings are presented under a series of headings. In certain cases, interviewees cited more than one area of interest and this is represented in the graphical summaries.

As outlined in Section 4.2.3, the interviews were conducted with a small number of participants and thus it is recognised that the identification of exact patterns and themes within the findings is more challenging. Nevertheless the information gleaned from these experienced professionals is very insightful and captures their context-specific knowledge regarding brownfield land activation projects.

8.2 Non-physical Challenges

Following discussions with industry professionals it is evident that there are several non-physical challenges that project sponsors, developers, internal project stakeholders and others often encounter in the process of developing brownfield sites. Each site or project is unique but the non-physical challenges can result in the redevelopment of a site being delayed or put on hold. These challenges can significantly impact the design, planning consent, and execution of brownfield redevelopment.

Interviewees cited examples of where projects have been delayed or put on hold due to non-physical challenges. One interviewee cited how a large residential development on a brownfield site was delayed due to fractured ownership.

All interviewees identified planning as a challenge with the majority also citing land ownership as an issue. Other challenging areas cited include community opposition and financial viability. Under planning, many interviewees identified the planning system, in general, as a source of much uncertainty and requiring *'fundamental reform.'* It should be acknowledged that this comment was not solely directed to brownfield redevelopment but was directed more generally at the planning process. Interviewees acknowledged that there is an on-going review of the planning process which looks to address some of the frustrations. Financial viability is examined in more detail in Section 9.

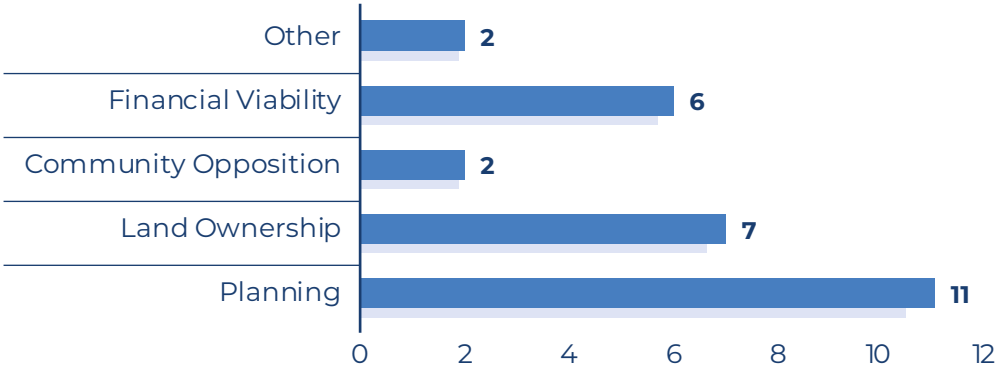

Figure 9: Non-physical Challenges Identified by Interviewees.

8.3 Physical Challenges

Physical challenges associated with brownfield development stem from the historical use of these sites, which may have left them contaminated or burdened with deteriorated infrastructure. Overcoming these physical challenges requires careful planning, environmental assessment, and remediation efforts.

Proximity to primary infrastructure (i.e. water, drainage, power), contamination and geotechnical conditions were cited by six or more of the interviewees as the main physical challenges. Other considerations cited when dealing with brownfield sites included demolition, heritage and archaeology.

Many of these areas are unknowns or risks on a brownfield site, especially at bidding stage, and can be a major deterrent. Feasibility models are based on a certain set of assumptions, which dictate how much someone can spend on the site purchase. These assumptions could prove to be widely incorrect once detailed surveys and investigations are commissioned.

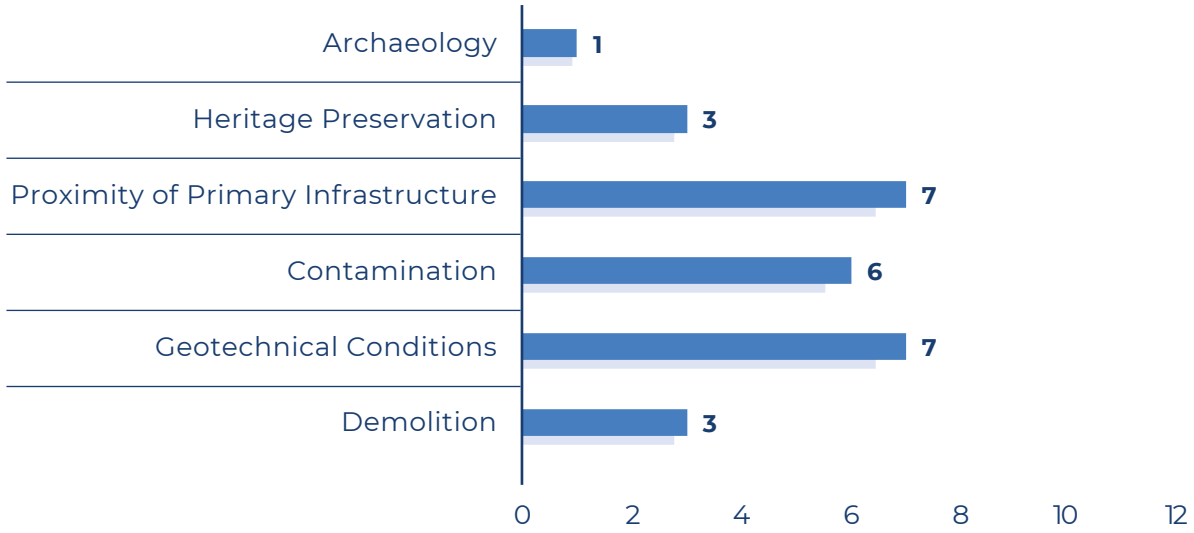

Figure 10: Physical Challenges Identified by Interviewees.

8.4 Barriers to Redevelopment

Aside from the physical and non-physical challenges, there are barriers or obstacles which prevent or delay the development of these types of sites. Barriers predominately consist of factors external to the project and overcoming a barrier may require a different approach whereas a challenge is specific to the project.

We asked each interviewee to identify what they considered to be the main barriers when it comes to brownfield redevelopment and possibly cite examples of how and when these were encountered.

One particular interviewee explained in detail the challenges of repurposing existing derelict buildings. In particular, the practical application and financial premium for complying with fire and disabled access requirements resulted in a particular portion of the city centre project being put on hold while work on the new buildings provided for in the Masterplan proceeded.

Generally, the themes identified are largely consistent with the SCSI 2023 Report on the ***'Real Cost of Renovation'***. Eight of the interviewees identified planning policy as a barrier with a subsequent seven noting bureaucracy in the overall redevelopment process as an issue/ barrier. Access to funding, compliance with building regulations, first mover disadvantage and prescribed authorities were all identified as barriers to varying degrees.

First mover disadvantage is a term used whereby an entity that wishes to develop a site is charged a premium for infrastructure works or the like which will ultimately benefit subsequent developments on/or adjacent to the site. An example might be the requirement to upgrade a nearby wastewater treatment plant which not only provides capacity for the current development but also generates extra capacity for future developments.

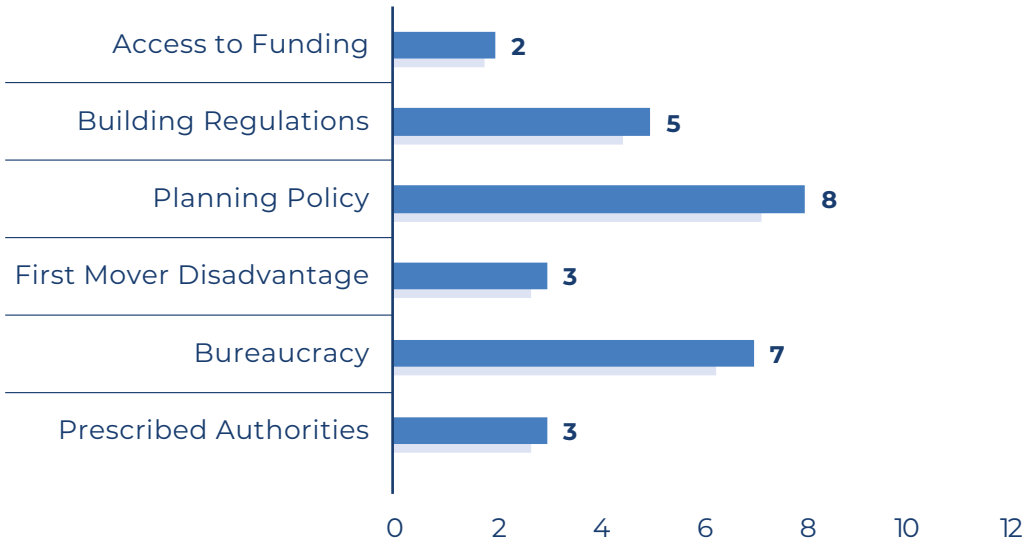

Figure 11: Barriers to the Redevelopment of Brownfield Lands Identified by Interviewees.

8.5 Suggested Solutions

All interviewees acknowledged the complexity of redeveloping brownfield sites and that there is no *'silver bullet'* solution to the problem. As described in the introduction, brownfield sites vary significantly in scale, complexity and characteristics and thus a *'one size fits all'* approach does not suit all sites. This is reflected in the range of initiatives that are in place and described in Section 5.

There was a consistent theme across the interviews for a targeted strategy when it comes to brownfield land activation. All interviewees indicated that strategic focus on the most challenging or least attractive sites is required. The Dublin Docklands development was cited in the majority of the interviews as a good example of how sites were de-risked and made more attractive for developers. The consensus was that this macro level strategy and intervention could be applied to sites peppered across a city with the ultimate goal of de-risking them to promote private sector engagement.

Only two interviewees suggested additional financial incentives as a solution to brownfield land activation. Review of building regulations application, review of the planning system, a dedicated national body and a pragmatic approach to derelict buildings were suggested as potential aids to facilitate redevelopment by more of the interviewees. One interviewee identified local area plans and local authority Compulsory Purchase Order (CPO) powers as mechanisms to activate brownfield sites. It was suggested increased CPO powers for local authorities and the establishment of a *'set of rules'* would be beneficial.

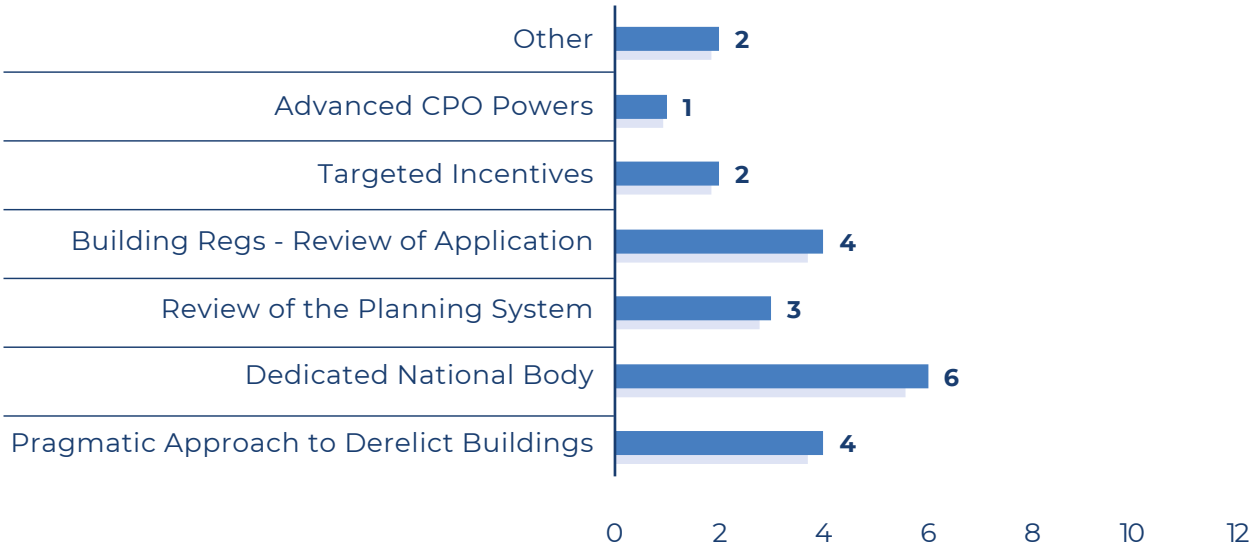

Figure 12: Suggested Solutions to Facilitate Brownfield Redevelopment.

In various interviews, there was an acknowledgment of the role played by the LDA in terms of engaging with other state bodies to identify large urban brownfield sites for redevelopment. The LDA would appear to have a clear approach of assessing individual sites and identifying priority sites which can be developed more readily. In proposing a *'dedicated national body'* the interviewees are suggesting that, either by way of extension of the LDA or another body, this body would be responsible for the redevelopment of small to medium-sized sites in cities, towns and villages. This body would have a dedicated team with the appropriate experience, skills and expertise which would work directly with local authorities to develop brownfield sites.

8.6 Interview Findings

The interviews have provided *'on the ground'* feedback based on actual experiences. The findings of the interviews align with themes and practice identified from the literature review.

Planning was identified as a challenge and a barrier, however, it is important to note that this is understood to be in the broader context of the planning system and not just in relation to brownfield sites. The current review of the planning legislation is likely to address some of the issues identified by the interviewees.

Financial viability was cited as a challenge and this is examined in more detail in Section 9. In particular the additional costs which are due to *'abnormals'* encountered on brownfield sites. Section 9 looks at the direct as well as the indirect costs of brownfield versus greenfield development.

The main barriers identified include compliance with building regulations, planning policy and bureaucracy. Interviewees were able to recount examples of how these barriers have impacted projects.

There is a consensus that no single solution exists but a series of targeted interventions could help to facilitate brownfield redevelopment. The key solution proposed focused on identifying a body that will take ownership of this area including identifying sites, assessing them and put in place strategies to facilitate their redevelopment. It was stated that such an entity or single point of contact could account for sites of all sizes and not just large masterplan scale sites. In addition to this, the application of building regulations, review of the planning system and a pragmatic approach to derelict buildings were noted as areas that need to be addressed and improved to overcome current challenges and barriers.

Section 9.0

Cost Comparison- Direct and Indirect Costs

9.0 Cost Comparison – Direct and Indirect Costs

9.1 Introduction

To complement the qualitative findings from the preceding sections, in this section a quantifiable analysis is provided of a residential development, which encountered some of the challenges discussed in the previous sections. The development costs for an anonymised residential development on a brownfield site is compared to a hypothetical greenfield site.

It should be noted that the data provided here is for illustrative purposes only and should not be applied to other brownfield versus greenfield site comparisons. The figures presented are specific to the particular project and scenarios presented. These costs should not be relied upon for comparison or benchmarking purposes. As detailed in the four case studies described in Section 7, each brownfield site is unique and presents a unique set of challenges that need to be assessed on a case-by-case basis.

9.2 Anonymised Brownfield Project

For the purposes of this cost comparison, the project in question is anonymised due to commercial sensitivity. The project is an on-going residential development in an urban brownfield site. The project was selected for analysis due to the relevance in terms of the issues and challenges it encountered.

9.3 Basis for Cost Comparison

In order to generate a cost comparison, a hypothetical greenfield scenario was developed and this was compared against the brownfield development. Both developments provide 110 residential units albeit in respective brownfield and greenfield locations.

While the majority of the base building design remains largely consistent regardless of the site and location, certain details have been adjusted to reflect a typical greenfield development. For example, the plot area is typically larger in greenfield sites due to cheaper land costs and to accommodate more greenspace and car parking. See Table 4 below for details.

For the purposes of the comparison, we have assumed that all other, outside of what is identified below, aspects of the design and project remain the same across both developments.

	Brownfield Site	Greenfield Site (Hypothetical)
Location:	Brownfield site in urban location on the city centre edge with adjoining buildings on site boundary.	Greenfield suburban site with similar residential buildings on neighbouring sites.
Plot Size (m^2):	3,900m^2.	4,500m^2 (brownfield plot plus 15%).
Site Characteristics:	The urban site is approximately 0.39 hectares on a relatively flat site. The site is a disused car dealership, car garage and filling station. Underground tanks and the like are present on the site. There is asbestos material in the existing building fabric and there is a risk of ground contamination from a previous use. Site access is generally good but the site is tight against adjoining properties/structures.	Relatively flat site with little unknowns.
Proposed Development:	Residential development with 110 units including basement and associated site works.	Residential development with 110 units including basement and associated site works.
Building Design:	Proposed six storey building over basement with a gross floor area of approx. 12,300m^2.	Proposed six storey building over basement with a gross floor area of approx. 12,300m^2.
Other Considerations:	Site access and logistics are constrained with minimal space for storage and site offices on site. Multiple adjoining buildings/structures which need to be considered during the construction phase.	No constraint on site access and ample space for storage, logistics and site offices.
Utilities/Services:	All main utilities are available on the boundary of the site.	All main utilities are available on the boundary of the site.

Table 4: Summary of the Brownfield Site and Hypothetical Greenfield Site Characteristics.

9.4 Development Cost Headings

The costs are analysed under three main headings as follows:

- Site Costs;
- Hard Costs (i.e. construction costs);
- Soft Costs (i.e. fees, statutory development contributions, etc.)

Site costs refer to the cost of purchasing the site. This is usually calculated based on the number of units that can be accommodated on the site. Whilst the actual site costs were not available for the anonymised project, recent datasets were obtained from property experts on typical site purchase costs for urban and suburban sites. A minimum and maximum range is used for each location (i.e. the brownfield and greenfield sites used for this analysis).

Hard costs or construction costs can also sometimes be referred to as bricks and mortar. This includes all direct costs associated with the construction of the building and the associated landscaping or external works. It is typically the costs paid to a builder to complete the works.

For the anonymised project, this is based on live construction costs. By live, this includes the original contract amount agreed with the builder plus any variations that may have occurred during the course of the construction works to date.

For the purposes of this analysis, the site abnormals associated with the brownfield site have been identified separately. These include all works that are unique to the brownfield site and typically would not be encountered on an equivalent greenfield site.

For the greenfield construction costs, actual cost data from over 13,000 new apartments[36] has been used to generate the comparison costs.

Soft costs are sometimes referred to as indirect costs and include a variety of costs associated with the completion of a development. They include, professional fees, statutory contributions, utility fees, sales and marketing, finance costs and contingency. The costs used for this comparison are based on publicly available information and market norms and are set out in Table 5.

[36] Source Mitchell McDermott Internal Cost Database.

Indirect Cost	Source	Calculation
Planning Contributions	Local authority	€/m²
Uisce Éireann	Uisce Éireann	€/unit
Disability Access Certificates	Local authority	€/unit
Part V	Based on site value	20% of the difference between existing use value and market value.
ESB	ESB	€/unit
Telecoms	Telecom providers	€/unit
BER Certificates	Local authority	€/unit
Latent Defects Insurance	Insurance providers	€/unit
Planning Application	Local authority	€/unit and/or €/m²
Fire Safety Certificates	Local authority	€/m²
Professional Fees	Market norms	8% applied
Sales and Marketing	Market norms	1.5% of sales
Finance	Current market rates	One handover assumed for apartments.
Contingency	Market norms	5% across both scenarios. Potential argument for a higher percentage on the brownfield site.

Table 5: Summary of Soft Costs Associated with the Completion of a Development.

9.5 Development Cost Comparison

Table 6 below presents the capital expenditure uplift for developing the same residential development on an urban brownfield site in comparison to a greenfield site. The figures are provided as a range as the greenfield scenario is hypothetical. Every project has some degree of abnormals which can add cost to the overall project.

For the purposes of this comparison, viability is not assessed. However, it is recognised that the finished development on a brownfield site has a potentially higher value due to its urban location and will potentially help offset some of the development costs premium.

It should be stated that Section 48 Development Contribution costs may be subject to reductions or potentially full exemptions for brownfield sites. Greenfield sites are, generally, subject to full contributions as per the relevant local authority requirements and the guidelines.

What is the Additional Capital Cost of Developing on a Brownfield Site Versus a Greenfield Site?

Development Cost Categories	Additional Capex Cost Range	Brownfield	Greenfield
Site Costs:	**€8k/unit - €11k/unit**	Site costs for urban locations tend to be higher due to location and proximity to services.	Greenfield sites, albeit potentially more attractive, tend to have lower land values compared to urban brownfield sites.
Hard Costs - Site Abnormals:	**€9k/unit - €12k/unit**	Existing buildings (car dealership, garage and filling station) to be demolished. Underground tanks and associated structure to be broken out. Asbestos materials in the existing buildings fabric. Contamination in the existing ground which is a cost uplift to dispose. Boundary walls which require a combination of re-building and re-pointing.	Greenfield site- no works. Site clearance/preparation included in construction costs.
Hard Costs - Construction Costs:	**€28k/unit - €37k/unit**	Including apartment and proportional cost for parking and site works. Typically there is a premium for building in urban locations over greenfield sites due to constraints around site access, logistics, proximity of neighbouring properties.	Including apartment and proportional cost for parking and site works.
Soft Costs:	**€13k/unit - €17k/unit**	Including statutory fees and contributions, professional fees, sales and marketing costs, finance and contingency. Majority of these costs are linked to the hard costs.	Including statutory fees and contributions, professional fees, sales and marketing costs, finance and contingency. Majority of these costs are linked to the hard costs.
TOTAL:	**€58k/unit - €77k/unit**	Overall cost uplift range for brownfield versus greenfield based on an actual brownfield site and hypothetical greenfield.	
EXCLUSIONS:		The costs exclude the indirect costs of urban sprawl. See details below.	

Table 6: Details of the Capital Expenditure Uplift for Development on an Urban Brownfield Site Versus a Greenfield Site.

The time cost for the site preparation works associated with the brownfield site (i.e. surveys, soft strip, demolition, decontamination, boundary wall works) is not factored into the above analysis but will add a cost premium.

9.6 Sensitivity Analysis

Following on from the cost comparison provided above, this section includes a sensitivity analysis on the greenfield hypothetical scenario (i.e. base case) and the brownfield development. On the brownfield development various scenarios are generated to provide a wider view on the sensitivity. In order to do this, development appraisals are prepared for each option as well as the scenarios.

The sensitivity is run across a range of figures from Low to High, to provide a wider view of the range of possible outcomes. The sensitivity analysis provides a range to capture some of the situations encountered, but each scheme is specific and, as such, may present a different outcome.

Similar to the SCSI 2021 report on the ***'Real Costs of New Apartment Delivery'***, a 15% (gross profit on cost) hurdle rate has been used to establish if an appraisal is deemed viable or not. This would be seen as a typical industry standard and a common requirement from lending institutions.

The Viability Subvention, where applicable, is the difference required to deliver a 15% gross profit margin on total cost.

Sales prices are based on local sales data gathered from property agents. The sales data is based on Greater Dublin Area (GDA) sales prices as of Q3 2023.

Table 7 shows the development appraisal for the greenfield and brownfield sites and scenarios based on the brownfield project. The scenarios are based around parking ratio, building height/ number of units and development contributions waiver.[37] The purpose of this is to demonstrate the viability sensitivity and the impact these items have on a scheme.

[37] Note the provisions of the Development Contributions, Guidelines for Planning Authorities (2013).

INPUTS	Scenario 1: Base:	Scenario 2: Actual Project:	Scenario 3: 100% Parking:	Scenario 4: 4 Storey Building:	Scenario 5: Dev Cont. Waiver:	Scenario 6: 20% Parking:
Site Type:	Greenfield	Brownfield	Brownfield	Brownfield	Brownfield	Brownfield
Units:	110 units	110 units	110 units	75 units	110 units	110 units
Storeys:	6 storeys	6 storeys	6 storeys	4 storeys	6 storeys	6 storeys
Parking Ratio:	61%	61%	100%	91%	61%	20%
Development Contributions:	Yes	Yes	Yes	Yes	No	Yes
OUTPUTS						
1. Site Costs:	37,000	47,000	47,000	47,000	47,000	47,000
2. Hard Costs:						
2.1 Abnormals:	0	11,000	14,000	16,000	11,000	7,000
2.2 Construction:	238,000	266,000	266,000	266,000	266,000	266,000
2.3 External Works:	19,000	18,000	18,000	27,000	18,000	18,000
2.4 Parking:	29,000	36,000	59,000	54,000	36,000	12,000
3. Soft Costs:	114,000	132,000	138,000	139,000	118,000	123,000
4. Total Cost per unit (inc VAT):	437,000	510,000	542,000	549,000	496,000	473,000
5. Total Sales per unit (inc VAT):	450,000	488,000	488,000	488,000	488,000	488,000
6. Margin/Risk:	13,000 3%	-22,000 -4%	-54,000 -10%	-61,000 -11%	-8,000 -2%	15,000 3%
7. Viability Subvention:	52,550	98,500	135,300	143,350	82,400	55,950

Table 7: Development Appraisal for Greenfield and Brownfield Sites and Differing Scenarios Based on the Brownfield Project.

All scenarios require varying levels of subvention based on the 15% hurdle rate. Scenario 1 is based on the hypothetical greenfield site described in Section 9.3 and provides only a 3% margin which therefore doesn't meet the 15% hurdle rate. It is worth noting that the margin is based on a lower sales value which is linked to the suburban location.

Scenario 2 is based on the actual brownfield project described in Section 9.3 and presents a 4% loss. Scenarios 3 to 6 are different versions of the brownfield project in scenario 2.

Scenario 1 and scenario 6 are the only appraisals which show a margin albeit well below the hurdle rate. Scenario 6 accommodates only 20% parking compared to 61% in scenario 1 but both present a 3% margin.

Using the figures from the development appraisals, we plot the figures against a sliding scale of sales values which provides an indicator on the levels of subvention when the sales value is adjusted (see Table 8). For example, at a sales value of €524,600, scenario 1 requires no subvention but scenarios 2 to 6 require subvention ranging from €19,350 to €106,750.

SENSITIVITY ANALYSIS						
SALES PRICE:	TOTAL DEVELOPMENT COSTS					
	Greenfield	Brownfield	Brownfield	Brownfield	Brownfield	Brownfield
	Scenario 1:	Scenario 6:	Scenario 5:	Scenario 2:	Scenario 3:	Scenario 4:
	437,000	473,000	496,000	510,000	542,000	549,000
450,000	52,550	93,950	120,400	136,500	173,300	181,350
464,762	37,788	79,188	105,638	121,738	158,538	166,588
476,098	26,452	67,852	94,302	110,402	147,202	155,252
488,000	14,550	55,950	82,400	98,500	135,300	143,350
500,200	2,350	43,750	70,200	86,300	123,100	131,150
512,400	n/a	31,550	58,000	74,100	110,900	118,950
524,600	n/a	19,350	45,800	61,900	98,700	106,750

Table 8: Sensitivity Analysis Based on the Development Appraisals and the Sliding Scale of Sales Values for the Greenfield and Brownfield Sites and Differing Scenarios for the Brownfield Project.

Overall, it can be stated that the level of subvention required to make the project viable for the market to deliver is lower for a greenfield site. However, this cost analysis looks at it from a direct project level perspective and not from a strategic policy-making perspective and therefore doesn't account for the indirect costs.

9.7 Indirect Costs

Indirect costs, commonly referred to as the cost of sprawl, should be accounted for when comparing brownfield and greenfield development in the formulation of policy and design of financial subventions. This cost is classified as indirect because it does not impact the development appraisal which is commonly undertaken by a private sector company or the developer (which could be an AHB) that has other priority objectives in developing a site. For private developers there is potentially less concern with the common good, climate agenda, sustainable development and/or the financial burden of the state.

As stated earlier in the report, there is very little research carried out in an Irish (and European) context on the cost of sprawl. As cited in Section 6.1, a report by Sustainable Prosperity examined direct capital and operational costs of urban sprawl which showed that the additional public cost of maintaining a suburban household was 244% higher than an urban household.

Some of the main headings associated with sprawl include the capital and operational cost of:

- Arterial, Regional and Local Roads
- Heavy Rail
- Light Rail
- Bus
- Water
- Wastewater
- ESB
- Telecoms
- Parks
- Fire protection
- Public administration
- Gardaí
- Libraries
- Community buildings
- Culture
- Worship
- Energy costs
- Indirect healthcare costs due to commuting
- Environmental cost
- Inefficient use of land that could be used for farmland/recreation
- Personal cost of travel
- Traffic accidents

It is known from other countries that have carried out empirical research that there is a real cost to urban sprawl both from a capital expenditure point of view and an ongoing operation cost burden. A report recently published by the Housing Commission (Report of the Housing Commission - May 2024) contained an analysis of the cost of urban sprawl. From the scenarios, used for the purpose of that analysis, it was estimated that urban sprawl cost an additional €102,000 to €137,000 per home. These additional costs excluded:

- Land
- Operation costs
- VAT
- Energy
- Healthcare impact
- Resident travel costs
- Metro (if applicable)
- Indirect cost of traffic incidents
- Environmental impact
- Additional cost or inefficiencies associated with social infrastructure (e.g., parks, waste, fire, public admin, Gardaí, libraries, schools, culture etc.)

9.8 Cost Comparison Findings

Analysis of total direct private development costs and the wider public costs in relation to both brownfield and greenfield development demonstrates a deep dilemma for policy-makers.

Looking narrowly at direct developer/development costs, brownfield development is more expensive when compared to greenfield sites. Across six scenarios of one greenfield and five brownfield sites, all scenarios required subvention from €19,350 to €106,750 to achieve a 15% return rate, with greenfield development requiring the least amount of subvention.

However, the tables turn when wider indirect costs are factored in reflecting the fact that greenfield development typically requires more significant public infrastructure investment.

Indirect costs refer to infrastructure costs borne by the state and public sector and ultimately the taxpayer to service new development areas that have not been serviced previously. Such infrastructure includes access (roads, footpaths, cycleways, bus facilities), water services, schools and other necessary public and social infrastructure. The cost of even core spine infrastructure such as access and water services will typically cost a minimum of €100,000 to €150,000 per residential unit more than in the case of a brownfield site. Such costs are before additional costs and operational costs are factored in.

In summary, brownfield and sustainable urban development is more cost effective than greenfield development from a public investment perspective but is more challenging from narrow development viability perspectives to deliver at affordable costs to purchasers and renters.

This has given rise to the phrase that affordable housing, which tends to be more deliverable on greenfield sites, tends not to be as sustainable as brownfield development which tends to be more expensive and therefore less affordable to average income households.

Section 10.0

Summary of Findings

10.0 Summary of Findings

10.1 General Findings

This section presents general findings from the research. It breaks the findings down into a number of themes including:

- Vision and leadership;
- Economic and financial aspects;
- Forward planning and data;
- Land ownership;
- Development management; and
- Building control.

Each theme is examined under three headings including:

- Current challenges and barriers;
- Key learnings; and
- Opportunities that can assist in brownfield land activation.

Exploration of the themes has been driven by the findings set out in the previous sections in this report, including the economic analysis of brownfield versus greenfield development set out in Section 9. A central finding of this research, is that while brownfield development is typically and demonstrably beneficial in a wider societal, environmental and economic context, it is challenging in a narrow project viability sense. It is therefore often difficult to justify brownfield development in terms of a sufficient internal rate of return that is necessary to enable a project to be funded.

This research demonstrates that it is possible to mitigate the challenges associated with the activation of brownfield lands and improve their prospects in terms of viability, by having regard to the following themes.

10.2 Vision and Leadership - Creating Solutions

Current Challenges and Barriers:

- Brownfield lands are invariably complex to regenerate. For example there is frequent fragmentation of roles and responsibilities in terms of land ownership, the local community's sense of what an appropriate regeneration would envisage and wider national and regional policy drivers for reasonable densities of development.
- Creating a strong consensus on a vision for brownfield development requires time and considerable effort, particularly in terms of community engagement.
- The capacity, expertise and resources of local authorities can play a crucial role but frequently such capacity is instead drawn across multiple and competing, even conflicting priorities.

Key Learnings:

- Irish and international experience highlights that a range of state interventions (planning, regulatory, risk management and economic) are vital to ensuring that to the maximum extent the regeneration of brownfield sites can compete with greenfield alternatives.
- Central to such interventions is a plan-led approach to brownfield development built upon the foundation of institutional (local authority, state and NGO bodies), development sector (funding and finance) and community buy-in.

Opportunities that can Assist in Brownfield Land Activation:

- There are both Irish and international examples of plan-led mechanisms that properly work out a vision for regeneration that is both implementable and supported by communities, however, it is acknowledged they are resource intensive to bring about.
- There are also opportunities to build better public and institutional awareness on the imperative of counteracting urban sprawl and promoting compact growth in achieving parallel planning, housing, transport, climate and community development objectives.
- The regulatory and policy framework in Ireland in relation to planning has an increasing focus on the need to secure more brownfield regeneration and activation of key sites through the work of the LDA, NDP supported through the URDF, Town Centre First policy, Vacant Homes Officers, Urban Development Zones (UDZs) with associated networks and structures for engaging with communities.

10.3 Economic and Financial Cost of Brownfield Development

Current Challenges and Barriers:

- The prevailing and predominantly lower-density, extensive and greenfield development model in Ireland, while economically more advantageous for developers to deliver, ultimately costs more to the state and society in the long run in terms of public and societal infrastructure and environmental costs.
- Brownfield development tends not to happen without deliberate planning, prioritisation, problem solving and – on occasion – the application of tailored public funding and economic supports (see Sections 7 and 8).
- There is a lack of consistency in how local authorities use their discretion to reduce development contributions for brownfield sites and increase development contributions payable on greenfield sites as provided for under Section 28 Guidelines relating to the making of local authority Development Contribution Schemes.
- There are a significant number of initiatives and subventions in Ireland that have been launched under different policy frameworks (see Appendix B). Many of these offer the potential to incentivise brownfield development. The complexity of navigating the various schemes together with awareness of the schemes has been identified as a barrier to drawing down or accessing the schemes. The uptake and success of initiatives and schemes has been varied.
- The research has demonstrated that due to their more central locations, brownfield developments encounter higher development costs ranging from €58,000 to €77,000 per residential unit (see Table 6 - Section 9). Additional factors such as the constraints of developing in a tight urban location can add further challenges and costs.

Key Learnings:

- International norms suggest that, on average, greenfield development can cost the state from €100,000 to €150,000 per residential unit in indirect costs, when compared to brownfield development.
- Evidence from other jurisdictions shows that some states de-risk brownfield sites before making them available for delivery. Some use their tax system.
- Across six scenarios which included one greenfield and five brownfield options, each scenario required some level of subvention to meet the 15% return rate (excluding indirect infrastructure costs).

Opportunities that can Assist in Brownfield Land Activation:

- Build awareness of the critical role of local authorities and co-ordinate application of the growing variety of incentives and supports (Croí Cónaithe, Town Centre First, Vacant Homes, Housing for All). This requires clear strategies and resources at local authority level working with wider stakeholders and targeted at key brownfield opportunities.
- Co-ordinate implementation of the range of initiatives of the state including URDF, RRDF, Croí Cónaithe, Town Centre First, vacant housing within the context of the wider policy context for planning in Ireland and at EU level that prioritises regeneration.

- Development of an *'all of government'* approach to the activation of brownfield land, similar to the approach envisaged by the National Oversight and Advisory Group (NOAG) for Town Centre First.
- Development of an online platform, to promote awareness and provide information on the various initiatives and schemes that exist and their applicability in differing circumstances.

10.4 Forward Planning and Data

10.4.1 Forward Planning for Regeneration

Current Challenges and Barriers:

- Brownfield regeneration takes a considerable amount of time whereas current policy priorities, such as housing delivery, can take priority over unlocking complex sites that take longer to deliver than *"ready-to-go"* greenfield locations.
- There is a cultural attachment to lower density and extensive forms of development with some local authorities having to yet deeply embed the concept of compact growth in their statutory plans as evidenced by the number of Directions issued by the Minister for Housing, Local Government and Heritage under Section 31 of the Planning and Development Act 2000, as amended.
- While there is a specific NPF National Policy Objective for compact growth (NPO3), there are no metric policy objectives for brownfield land activation, which negatively impacts on the implementation and monitoring of delivery of brownfield development.

Key Learnings:

- Successful regeneration projects in Ireland and beyond share one key element i.e. a strong focus on both the principles and mechanics (economics) of brownfield land activation at plan-level, allied to effective masterplanning and community engagement.
- Newer development plans, prepared since the publication of the NPF and introduction of the Regional Spatial and Economic Strategies (RSESs) and overseen by the OPR, are significantly stronger and clearer on regeneration and brownfield opportunities but need to be followed up by a focus on implementation.

Opportunities that can Assist in Brownfield Land Activation:

- The ongoing revision of the NPF could strengthen and clarify compact growth targets. Local authorities in turn could be tasked with the activation of brownfield sites to meet an enhanced suite of delivery targets and harness a growing range of economic supports.
- Build on the role of the OPR in conducting education and training programmes for local authority and regional assembly staff and elected members. This could be done specifically, through the delivery of training and knowledge sharing on brownfield land activation including the CPO process.

10.4.2 Data

Current Challenges and Barriers:

- Unlike other EU and international examples, there is no national register or database of brownfield sites in Ireland. Such a register could be used to categorise brownfield sites in a consistent manner having regard to their scale, benefits, complexity and priority for delivery. There is also a lack of consistency across local authorities in the implementation of existing registers such as the derelict sites register.

Key Learnings:

- Lessons from international experience would indicate that there is a need for a central database of brownfield sites based on a consistent methodology to (a) identify and (b) understand the characteristics of each brownfield site.
- Experience from implementation of the RZLT provides lessons in relation to resourcing the compilation of any national brownfield site register.

Opportunities that can Assist in Brownfield land Activation:

- To build on wider datasets and digital mapping (Geographic Information System (GIS)) tools in existence, aligning with plans at county and local level, building on existing IT systems uch as MyPlan and the LDA's Register of Relevant Lands (public lands).

10.5 Land Ownership and Title

Current Challenges and Barriers:

- Land ownership complexities are one of the most significant challenges and barriers to the activation of brownfield sites. Similar constraints are generally not a feature of greenfield sites; thus adding to the imbalance between market delivery and activation of brownfield and greenfield development.

Key Learnings:

- Successful brownfield projects in Ireland and internationally signal that public sector land assembly is a highly effective way of activating brownfield sites because it often de-risks sites to make them more attractive for development.

Opportunities that can Assist in Brownfield Land Activation:

- Enhancing local authorities *'development role'* in combination with that of the LDA thereby building expertise, capacity and an appropriate appetite for risk and risk mitigation.

10.6 Development Management

Current Challenges and Barriers:

- Resourcing of local authorities and the planning system in general is an issue in terms of facilitating its capacity for meaningful pre-application engagement.
- The risk of appeals and/or judicial reviews and their timelines, with their implications for certainty in relation to project delivery, is a key barrier to brownfield land activation.

Key Learnings:

- Planning procedures work to promote brownfield land activation where there has been strong state intervention and a plan-led approach to preparation of masterplans and detailed design of proposals (e.g. Dublin Docklands).
- Where resources have been put in place in terms of staff and long-term funding this results in more brownfield land activation. This has created capacity for meaningful engagement, to address issues arising in pre-application and identify risks.

Opportunities that can Assist in Brownfield Land Activation:

- The Planning and Development Bill 2023, when enacted, will deliver streamlined and enhanced planning consent procedures, more definitive timelines for An Bord Pleanála decision-making, greater emphasis on pre-application stages and better alignment of environmental assessments.
- The preparation and implementation of a Ministerial Action Plan on Planning Resources will assist in the delivery of a more efficient and effective planning service and the long-term funding of the planning process through the reform of planning fees and charges will ensure a reasonable level of cost recovery.

10.7 Building Control

Current Challenges and Barriers:

- Compliance with generic/universal building control requirements can be more challenging especially when adapting existing structures and matching contemporary requirements to existing building fabric. This can create significant costs and uncertainties.

Key Learnings:

- The international literature review signals that building control is not as significant an issue in other administrations given the availability of specific codes that recognise the particular circumstances of adapting existing buildings.

Opportunities that can Assist in Brownfield Land Activation:

- The commitment to establish an independent Building Standards Regulator, combined with additional guidance and potentially specific codes relating to adaptive building re-use could offer significant opportunities to reduce this area of risk.

Section 11.0
Conclusions

11.0 Conclusions

Drawing on the lessons, observations and key findings of this research as outlined in Section 10, a number of suggested action areas to promote the activation of brownfield lands are set out below. These action areas outline opportunities to progress brownfield land activation in the short-term as well as measures that can be developed, in parallel, over the medium-term.

11. 1 Action Areas

11.1.1 Action Area 1 - Assigning Oversight and Responsibility

The preparation of a National Brownfield Land Activation Strategy would give the necessary focus for greater activation of brownfield land. A national strategy would enable:

- The development of a coherent vision for brownfield land activation;
- The establishment of both ambitious but realistic targets for brownfield land activation under the NPF Revision as set out in subsequent action areas;
- The mandating of the local government sector, the LDA and wider stakeholders, including essential infrastructure providers/agencies, to comprehensively and consistently profile and assess strategic brownfield development opportunities across the state; and
- The establishment of appropriate governance and delivery oversight structures, together with the necessary monitoring systems.

Opportunities:

- To support the development of a National Brownfield Land Activation Strategy an implementation and oversight arrangement is necessary. This could be similar to or a complementary part of the various *'Delivery Boards'* that have been put in place in relation to Project Ireland 2040 and the Climate Action Plan.
- To strengthen the structures and expertise developed within the LDA, complemented by the creation of regionalised or shared service type regeneration teams, to support local authorities in the delivery of brownfield development and regeneration.

11.1.2 Action Area 2 - Analysing the Brownfield Development Task - Establishing a Baseline

A key starting point for a National Brownfield Land Activation Strategy is the development of a national integrated database, clearly mapping the key brownfield opportunities across the state over a certain size or scale threshold to make the task manageable.

A database including mapping of brownfield lands, with a description of their key characteristics, opportunities, constraints and feasibility for delivery is necessary. Such a database, developed within an overall grading system, would assist with shaping subsequent short, medium and long-term action plans.

Opportunities:

- In the development of a national database of brownfield lands, build on the wealth of existing mapping datasets, including the National Land Cover, MyPlan, LDA Register of Relevant Lands, RZLT, Derelict Sites Registers and co-ordinate with emerging resources/ datasets such as the Directive on Soil Monitoring and Resilience and EPA data.
- To gain local support, insight and engagement by utilising existing regional and local networks, such as Public Participation Networks (PPNs), Town Centre Partnerships (TCPs) and Business Improvement Districts (BIDs), in the development of a national database.
- To undertake a pilot scheme with relevant stakeholders to establish the relevant datasets and mapping and methodology for the rollout of a national brownfield register.

11.1.3 Action Area 3 - Strengthen the Strategic and Statutory Policy Support for Brownfield Land Activation and Oversight of its Implementation

The approaching revision of the NPF and the enactment of the Planning and Development Bill 2023, present major opportunities. These need to be harnessed to fully strengthen the legislative, regulatory and policy structures for the activation of brownfield land across the state and thereby contribute to the state's climate change commitments.

Opportunities:

- Through the NPF revision establish more ambitious and precise metric requirements or targets for the delivery of compact growth generally and new housing on infill and brownfield lands.
- The prompt and full implementation of the proposed *'Urban Development Zones'* (subject to the enactment of the Planning and Development Bill 2023) is critical to planning the redevelopment of key brownfield sites.
- Through the work being undertaken through the Ministerial Action Plan on Planning Resources, ensure there is a sustainable pipeline of planning and related expertise within local government and the public sector generally[38] to ensure effective plan-making and full use of the tools of the planning legislation in activating brownfield lands.

11.1.4 Action Area 4 - Fiscal Measures for De-risking and Delivery of Brownfield Land Activation

The current NPF, NDP and Housing for All recognise that a range of measures, including economic instruments, are needed to ensure that brownfield lands are activated. It is recognised that left to purely market forces, historical patterns of greenfield development-led urban expansion would intensify. Therefore, through the development of a National Brownfield Land Activation Strategy (Action Area 1) it is imperative to simultaneously identify the fiscal measures that will support brownfield land activation.

Opportunities:

- Research and understanding on the costs of urban sprawl in Ireland can inform ongoing policy and budgetary processes. A significant body of research has been undertaken, in recent months, that can help to inform decisions on fiscal measures to encourage more compact urban and brownfield development. This includes incentivising more efficient land use instead of urban-edge housing construction which tends to be carbon and energy intensive and requires investment in new infrastructure.

[38] This pipeline should include the infrastructure agencies.

- Design fiscal incentives that foster brownfield regeneration and compact growth. There is an opportunity to redesign property taxes to incentivise more efficient land use and discourage low-density housing construction at the periphery of urban areas by adopting a development tax or impact fees that internalise the real cost of sprawl for project sponsors.
- Various grants, tax incentives and subventions should maximise the benefit for brownfield versus greenfield development.
- Ensure that competitions for state funding have a positive discrimination for brownfield development over greenfield, building on the URDF and RRDF approach.
- Implement the Land Value Sharing mechanisms envisaged in the *'Housing for All'* policy.

11.1.5 Action Area 5 - Public Engagement and Awareness

Ensure a plan-led approach continues to be embedded in the planning system and within national strategy on brownfield land activation. This will benefit significantly from enhanced community engagement and public awareness of the role of brownfield land activation, compact growth and prevention of urban sprawl in delivering a sustainable environment and meeting Ireland's climate objectives.

Opportunities:

- To leverage exemplar brownfield development and the creation of sustainable and inclusive projects through effective use of EU funding to support projects; as espoused in the European Green Deal, the New European Bauhaus and through the actions in the National Policy on Architecture (NPA).
- As outlined in the Planning and Development Bill 2023, expand and develop the public awareness role of the OPR.
- To enhance awareness on the various existing brownfield initiatives and schemes, develop an interactive online portal – integrated with brownfield registers as they become available. A one-stop-shop portal approach to demonstrate the eligibility of such areas to the various supports and initiatives for the benefit of landowners, communities and other stakeholders.

11.1.6 Action Area 6 - Streamlining of Wider Codes and Regulatory Frameworks to Support Brownfield Land Activation

Through the adoption of an *'all of government'* approach to brownfield land activation, a comprehensive review of existing codes, regulations and policy frameworks is required to advance measures that promote the activation of brownfield lands. These include, but are not limited to:

(a) Conveyancing and compulsory purchase;

(b) Environmental and waste regulations particularly for addressing construction waste and contaminated lands;

(c) The regulation and management of invasive species; and

(d) Building control systems including access for the mobility impaired, fire safety and conservation.

Opportunities:

- To build on the work currently being undertaken through the County and City Management Association's Housing, Building and Land Use Committee in the examination of conveyancing.
- To build on the work of the review of the building control system and the possible establishment of a new Building Control Regulator's Office.

11.2 Pathway

As outlined above, in order to transform the system to enable the activation of brownfield land and delivery of compact growth, there are several actions, involving many stakeholders, that will require leadership from policy-makers. These actions will necessitate the presence of strong public institutions with a developmental mandate and capacity.

To advance the debate and contribute to the transformation that is required in brownfield land activation, this research identifies a potential pathway based on eight key phases. This pathway is is illustrated in the following potential pathway diagram.

The Potential Pathway Diagram

Appendix A

List of Interviewees

List of Interviewees who Participated in the Research

Name	Role	Organisation
David Conway	Chief Executive Officer	Limerick Twenty Thirty
Peter Coyne	Former Chief Executive Officer	Dublin Docklands Development Authority
Michael Hand	Non-Executive Director Former Chief Executive Officer/Former Director	Dublin Port Company, Eirgrid and J.B. Barry and Partners Limited Grangegorman Development Agency
Brendan McDonagh	Chief Executive Officer Director	National Asset Management Agency National Treasury Management Agency
John McCarthy	Senior Asset Manager	National Asset Management Agency
Deirdre O' Connor	Head of Planning	National Asset Management Agency
Jan Mingle	Director of Property and Housing	Focus Ireland
Martin Donlon	Senior Architect	Dublin City Council
Sandra McAleer	Senior Executive Engineer	Dublin City Council
David Browne	Director	RKD Architects
Tadhg Daly	Planning Project Manager	Land Development Agency
Denis Malone	Acting Director of Services with Responsibility for Planning	Kilkenny County Council

Appendix B

Initiatives

The tables below summarise the range of initiatives that are relevant for brownfield land activation.

1. Applicable to Public Sector Bodies:

Initiative:	Details:	Financial Support:	Brownfield Only:
Urban Regeneration and Development Fund (URDF)	€2 billion fund to promote regeneration and rejuvenation of towns and cities (>10,000 population). Competitive bid based programme open to public sector. €150 million fund for local authorities to acquire vacant or derelict properties.	Up to 75% of total project value with 25% match from other sources.	Yes
Rural Regeneration and Development Fund (RRDF)	€1 billion fund to promote regeneration and rejuvenation of rural towns and villages (<10,000 population).	Up to 80% of total project value with 20% match from other sources.	Yes
Buy and Renew Scheme	Supports local authorities in purchasing and renewing housing units in need of repair and makes them available for social housing use.	No limit. Subject to specific criteria.	Yes
Cost Rental Equity Loan (CREL) Scheme	Housing provided for affordable rented accommodation to people on middle incomes. It is aimed at people who are above the threshold for social housing but have difficulty affording private rented accommodation. Cost rental homes are delivered by Approved Housing Bodies (AHBs), local authorities and the LDA.	Up to €150,000 subvention per unit.	No
Town and Village Renewal Scheme (TVRS)	Measure designed to revitalise and regenerate rural towns and villages. In 2023, the scheme was extended to include projects that bring vacant and derelict buildings and sites back into use as multi-purpose spaces, and projects that bring vacant properties in town centres back into use as Remote Working Hubs, where there is a demonstrable local need.	Ranging from €20,000 to €500,000. Subject to specific criteria.	Yes

Initiative:	Details:	Financial Support:	Brownfield Only:
Historic Towns Initiative	The initiative aims to promote the heritage-led regeneration of Ireland's historic towns. The programme is intended to support a small number of towns each year. Applications under the initiative are only accepted from local authorities. In 2024, a €2 million fund is available for local authorities with particular interest for proposals to bring vacant/underused floor area in historic buildings back into residential use.	Funding is in the region of €150,000 to €200,000 depending on the projects proposed. Maximum award of €350,000 per town.	Yes

2. Applicable to Private Sector Bodies:

Initiative:	Details:	Financial Support:	Brownfield Only:
Croí Cónaithe (Towns) Fund - Vacant Property Refurbishment Grant	A grant available for the refurbishment of vacant properties for occupation as a principal private residence, including the conversion of a property that has not been used as residential previously.	Maximum €50,000 with potential of additional €20,000 if certain criteria are met.	Yes
Repair and Leasing Scheme (RLS)	Brings vacant properties in need of repair, back into use for social housing. The scheme is aimed at owners of vacant properties who cannot afford the repairs needed to bring their property up to the required standard.	Maximum repair cost under the scheme is €80,000 including VAT.	Yes
National Home Energy Upgrade Loan Scheme/One Stop Shop Service	Grants to upgrade the energy efficiency of the property of owner-occupiers. When the work is completed their property should have an energy efficiency rating of B2 or above. Administered by SEAI and delivered by SEAI One Stop Shops.	Various grants ranging in value for different components.	Yes
Better Energy Homes Scheme	Grants to help owners and landlords reduce energy costs and emissions. This scheme is open to property owners for properties built pre-2011. Administered by SEAI.	Various grants ranging in value for different components.	Yes

Initiative:	Details:	Financial Support:	Brownfield Only:
Better Energy Warmer Homes Scheme (WHS)	Free home energy upgrades to homeowners who get certain social welfare payments. These upgrades help improve the energy efficiency and warmth of their home and are administered by the SEAI. Property has to be constructed pre 2006.	No limit - subject to survey and specific conditions.	Yes
Living City Initiative (LCI)	Tax incentive scheme for Special Regeneration Areas (SRAs) in Cork, Dublin, Galway, Kilkenny, Limerick and Waterford. It allows owners and investors to claim tax relief for money spent on refurbishment and/or conversion of residential property.	Cost of the works undertaken are for a minimum of €5,000: no maximum amount.	Yes
Long-term Leasing Scheme	Properties will be leased from the private sector by local authorities and used to accommodate households from the approved waiting list. This scheme is being phased out.	None.	No
Local Authority Home Loan Scheme	A government-backed mortgage for first-time buyers and certain other applicants. Loans are offered at reduced interest rates and can be used to buy new, second-hand properties, build a home and recently extended to buy and renovate derelict and non-habitable homes. This extension is planned for Q2 2024.	Borrow up to 90% of the market value. Market value varies by location.	No
Built Heritage Investment Scheme (BHIS)	Eligible structures include: protected structures, proposed protected structures and structures within Architectural Conservation Areas (ACAs).	Minimum €2,500 up to maximum €15,000. Public funding should not exceed 50% of total project cost.	No
Historic Structures Fund (HSF)	This fund seeks to invest essential capital into the built heritage and help the owners and custodians of historic structures to safeguard them into the future for the benefit of communities and the public.	Stream 1- €20,000 to €50,000 (essential repairs and smaller capital works). Stream 2- €50,000 to €200,000 (larger enhancement, conservation or reuse projects).	No

Initiative:	Details:	Financial Support:	Brownfield Only:
Temporary Development Contribution Waiver Scheme	Work must start between 25 April 2023 and 24 April 2024 and complete by 31 December 2025. Section 48 levies and Uisce Éireann levies only. Applies to all new residential and student accommodation.	Waiver of applicable fees/contributions.	No
Secure Tenancy Affordable Rental (STAR) Investment Scheme	A cost rental viability measure, aimed at addressing viability challenges for developments by providing equity investment to stimulate the creation of cost rental accommodation. Private providers and Approved Housing Bodies (AHBs) can apply to provide cost rental homes under the Scheme and the State will make an equity investment.	Funding of €150,000 to €200,000 per residential unit.	No
Croí Cónaithe (Cities) Scheme	This scheme is a fund to support the building of apartments for sale to owner-occupiers. The Scheme aims to bridge the current *'Viability Gap'* between the cost of building apartments and the market sale price (where the cost of building is greater).	Funding varies depending on viability gap.	No
Project Tosaigh	Initiative to unlock land in private ownership that has planning permission but where delivery has stalled due to financing and other constraints. The mechanism is administered by the LDA, in coordination with its local authority partners, and will be used for cost rental.	Project by project basis.	No

3. Encouragement Initiatives Applicable to Private Sector Entities:

Initiative:	Details:	Levy:	Brownfield Only:
Vacant Homes Tax (VHT)	A new tax introduced in 2023. It is an annual tax that applies to property that: a) can be lived in and b) has been stayed in for less than 30 days in the previous 12 months.	3x the basic rate of Local Property Tax for the property. This increased to 5x the basic rate in Budget 2024.	Yes
Vacant Site Levy	The levy is administered by local authorities who maintain a live register of vacant sites and must notify owners of their intention to include a site on the register. RZLT will replace the levy in 2025.	7% of the market value of the land. Reduce to 3% in 2024 under the new land tax.	No
Derelict Site Levy	The Derelict Sites Act 1990 allows local authorities to use certain powers to clean-up derelict sites. All local authorities must maintain a derelict sites register and can prosecute owners who do not comply with notices. The Act allows local authorities to make compulsory land purchases where there is no engagement from the owner.	7% of the market value of the land. *Note: An owner cannot be levied for both Vacant Site Tax and Derelict Site Tax.*	Yes

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