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Clúid Housing - submission on Draft First Revision to the National Planning Framework

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Observations:

1. The Vision

Chapter: 1. The
Vision

Clúid Housing - submission on Draft First Revision to the National Planning Framework

Clúid Housing welcomes the opportunity to offer input into the **Draft First Revision to the National Planning Framework**.

Clúid Housing is an independent, not-for-profit charity, and is one of the largest approved housing bodies (AHBs) or housing associations in Ireland. Established in 1994, Clúid leads the way in providing high quality, affordable rented homes to people in housing need. We work in partnership with local authorities to provide housing to those on social housing waiting lists. Clúid owns and manages over 12,000 properties providing a home to over 31,000 people.

The National Planning Framework, in our view, is vital to a proactive, strategic and successful approach to the development of our cities, town and countryside in Ireland. The relative independence and autonomy of local authorities and municipalities is important and should be retained. However, we believe that, in order for Ireland to be successful, from a social and economic perspective, it is essential that all stakeholders are working towards a common goal, using a common blueprint. The existence of a National Planning Framework is key to this.

Clúid is supportive of the broad thrust of the Draft First Revision to the National Planning Framework. In comparison to its first iteration, in 2018, we welcome the updated population projections and housing targets, a greater focus on sustainability, and more defined requirements in relation to implementation. We are conscious, however, that much of the content of the Framework directly mirrors that of the 2018 publication. This, alone, is not a cause for concern, given that, as a country, many of the same challenges persist and many of the same objectives are still held. Nonetheless, the question with regard to the degree to which the 2018 Framework was adopted should be addressed. On this basis, it is our view that the implementation of the new National Planning Framework should incorporate a review of the Framework measures adopted by local authorities and municipalities across the country, and of any challenges identified by such stakeholders in meeting the requirements and objectives of the Framework.

Our more specific observations are set out below, on a chapter-by-chapter basis:

Chapter 1

Given both the scale of the challenge and the time horizon involved, the National Planning Framework is by necessity a framework document; it cannot determine every detail now, as to do so would limit our flexibility to adapt as circumstances change, as well as our ambition in the face of such change.

We are in agreement with the degree of flexibility demonstrated in this statement. As we have seen in recent months, projections regarding migration, household size, carbon reduction etc. are and should be in a state of almost constant flux, and thus the Framework should not be overly prescriptive.

Too often in the past our policies and actions have sought to elevate one idea over another; they have even in some instances pitted one area against the other. Our ambition is to create a single vision, a shared set of goals for every community across the country.

This, in our view, is a positive statement and demonstrates a desire to move away from an often-siloed approach to planning and development in Ireland. It also alludes to the oft referred to urban/rural divide in Ireland. Both approaches or perspectives fail to encompass the need for an open, collaborative, and honest approach, for a successful society and economy in Ireland.

In the context of the overall management of the development potential of State lands to support implementation of the National Planning Framework, the Land Development Agency has been established to work with local authorities, public bodies and the business community, to harness public lands as catalysts to stimulate regeneration and wider investment.

We are in agreement with this statement and believe that the core function of the Land Development Agency should be that of a proactive land management actor, establishing public and private land banks in order to facilitate, as priority, the large-scale delivery of affordable housing by AHBs and local authorities.

The planning legislation underpinning the National Planning Framework also led to the creation of an independent Office of the Planning Regulator (OPR) in 2019, which is responsible for monitoring implementation of the NPF

The establishment of the Office of the Planning Regulator (OPR), in 2019, was a positive step forward to respect to improving the planning system in Ireland and ensuring that the Framework and planning legislation is adhered to. However, in order allow the OPR to function as effectively as possible, the relationship between local authorities and the OPR may merit review. For example, the 2022 case of legal proceedings of Cork County Council against a recommendation of the OPR is particularly concerning - Planning regulator was 'rattled' by local authority's legal action – The Irish Times

Overall, the Group recommended that the NPF revision could strengthen the Strategy in three broad respects:

Compact growth targets should be more ambitious and more clearly defined;

The roles of the bodies involved in its implementation should be clarified and strengthened (particularly in relation to the Metropolitan Area Strategic Plans) and mechanisms put in place for more detailed measurement and monitoring of its progress; and

There should be greater coordination at whole of government level across all infrastructure projects (including the NDP) and new efforts made to generate broader support for national spatial planning across all of society

We are in agreement with the statements above – more clearly defined compact growth targets, roles of stakeholders, and measurement and monitoring tools, as well as a more whole-of-government approach to national spatial planning, would undoubtedly assist in the success of the Framework.

This will give rise to a need for approximately 50,000 additional households per annum to 2040.

In total, this would amount to 800,000 homes between 2024 and 2040, which contrasts with the 2018 figure of ‘a need for at least an additional half a million new homes by 2040’. It is positive to see this figure updated in line with updated projections, and indeed, doubled since the 2018 report recommended an ‘average output of at least 25,000 new homes’.

However, we believe that it would be important to ensure that this figure includes unmet or ‘pent-up’ demand, with the recent Housing Commission report estimating this at between 15,000 and 25,000 new homes a year.

In addition, in relation to population, according to Planning & Development Consultants, John Spain Associates, if the growth rates between 2016 and 2022 were to continue, the population in 2040 would be approximately 411,000 people higher than estimated in the ESRI report referenced within the Framework.

On the basis of the above, we believe the figure in the Framework may need to be revised upwards.

As part of the preparation of the first Revision to the National Planning Framework, a number of environmental assessments are being carried out. These include Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and also Strategic Flood Risk Appraisal (SFRA)

We welcome the inclusion of environmental assessments in the Framework, given its absence from the 2018 publication. It is vital that, as a country, we meet all requirements of the Strategic Environmental Assessment Directive 2001/42/EC (the SEA Directive).

Chapter 2

The four cities and Dublin are geographically distributed, but their influence does not extend to all parts of Ireland, in particular the North-Western and Midland regions. It is critical that those regions also are served by accessible centres of employment and services that can be a focal point for investment and have the widest possible regional influence

While this was referenced in the 2018 document, the recognition that our major cities are not evenly distributed across the country, and that, therefore, our major towns should be carefully considered as part of our national approach to planning and development, is welcome and helpful.

Notwithstanding these considerations, it is emphasised that a settlement that is not specifically identified or for which specific targets are not set in this national Framework, is by no means precluded from future growth or investment. This must be considered at a regional and local scale, for which statutory planning processes exist, taking account of the general context set by the NPF.

It is positive, in our view, that the Framework does not seek to halt growth in settlements beyond the scope of the Framework. However, from an environmental and strategic (in terms of rapid delivery of housing) point of view, it will be important that focus remains on our major cities and towns – i.e. that the Framework, in retaining flexibility, does not become meaningless.

Recognising the impact of digitalisation in terms of city vibrancy, including changed shopping and working patterns, and to promote a responsive policy approach where needed.

We welcome the recognition of the impact of digitalisation on working patterns. Indeed, given recent Census figures indicating an increase in remote working, alongside an increase in average commuting time, further research on the impact of remote working on housing requirements is, in our view, required.

To account for the possibility of higher net in migration over the period to 2040, an allowance is made in the NPF to enable ambition and flexibility in planning for future growth.

We are in agreement with this approach, to allow for ambition and flexibility. However, given a similar statement was included in the 2018 Framework, yet Ireland has experienced major challenges in accommodating International Protection applicants in recent years, has retained significant social housing waiting lists and has reached record homelessness levels, it would appear that this flexibility or capacity is not yet present within the system.

Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up area of the five cities or a metropolitan town.

The addition of a reference to Transport Orientated Development (TOD) within the Framework is positive. We would be hopeful that this may serve to address the 'chicken and egg' situation of housing vs. transport/amenities – i.e. the relative difficulties in securing planning permission in locations absent of adequate public transport links, and the concurrent difficulties in advocating for the construction of transport infrastructure without the required level of housing in the locality.

Chapter 3

The adoption of Regional Spatial and Economic Strategies for the three regional assembly areas, consistent with NPF policy; The adoption of Regional Enterprise Plans; and The publication of the National Smart Specialisation Strategy for Innovation (2022), with a focus on specific regional strengths.... It is clear that a strengthening of institutional and governance arrangements to coordinate implementation of the NPF at national, regional and metropolitan levels, across all stakeholders involved, will be required if the strategy is to be delivered successfully

The introduction of these new 'institutional and policy measures aimed at supporting effective regional development' is positive and suggests that the implementation of the Framework might be strengthened on this occasion.

Chapter 4

The National Planning Framework targets a significant proportion of future urban development on infill/brownfield development sites within the built footprint of existing urban areas.

We very much welcome the references, throughout the document, to the need for infill or brownfield development. Such an approach is consistent with national effort regarding carbon reduction and climate change mitigation, both with respect to the reuse of buildings and in facilitating households to live close to their place of work or study, in towns and cities.

However, access to zoned land is vital to the success of such an approach. A recent report from Goodbody, indicating that there is not, currently, enough zoned land in the Eastern and Midlands area is cause for concern, particularly given that brownfield/infill construction is to be prioritised in Dublin. A full, public audit of all zoned

and serviced residential land, as well as a proactive land management approach, with the Land Development Agency at the helm, will be essential in unlocking the land required. [goodbody_residential-land-availability-report_sept24.pdf](#)

Infill and brownfield development is more challenging to deliver than greenfield development for a variety of reasons, including land management but also the challenge of integrating with existing communities,

To enable brownfield development, planning policies and standards need to be flexible, focusing on design-led and performance-based outcomes, rather than specifying absolute requirements in all cases.

We are in agreement that the development of housing on brownfield or infill sites presents an array of challenges, including soil contamination, that less often apply to greenfield sites. On this basis, we also agree flexibility of planning policies and standards to be important, but we would also posit that funding supports to developers of brownfield sites, in order to somewhat derisk the process, be considered. Without such support, the often less risky and more financially profitable greenfield sites will continue to be prioritised.

Dublin's Docklands, once one of the most disadvantaged and run-down parts of the City, today accommodates many thousands of people working and living in an attractive and desirable area that has been regenerated to a world class standard.

Clúid is a proud member of the Dublin Docklands community, with our main offices located on Sheriff Street. The Docklands has undergone a significant degree of regeneration in recent years. That said, we believe it to be vitally important that access to affordable housing in the Docklands area, and, indeed, any area in Ireland that has been regenerated, is protected. If we wish to retain the vibrancy of Dublin city centre, its pubs, its restaurants, its schools and its hospitals, low to middle-income households, and keyworkers, must be enabled to live here. We would welcome reference to this in the Framework.

Chapter 5

In rural areas elsewhere, facilitate the provision of single housing in the countryside based on siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.

www.gov.ie/pdf/?file=https://assets.gov.ie/297058/2fc8b4f4-96bc-4226-9de7-dbb843b815d0.pdf

We recognise that single, one-off housing is a feature of Ireland's housing system and will likely continue to be for some time. However, while welcoming the distinction made between 'rural areas under urban influence' and 'rural areas elsewhere', as was previously made in the 2018 Framework, we would encourage a balance of this objective with other objectives, including the increase in social and affordable housing and compact growth.

Indeed, this point is made in a recent Government publication on this topic: <https://www.gov.ie/pdf/?file=https://assets.gov.ie/297058/2fc8b4f4-96bc-4226-9de7-dbb843b815d0.pdf>

The paper refers to 'opportunity costs, potential displacement and deadweight from continuing to provide untargeted supports for one-off units' given they are a 'relatively sustainable delivery stream' and thus may not require significant State subsidies. Thus, while one-off housing needs to be accommodated, the delivery of social and affordable housing, in urban areas (cities *and* towns, across Ireland), to meet a very substantial need, must continue to be prioritised.

Housing, education, health and transport are four key areas where social inclusion can be improved; for example, through universal design of buildings to deliver greater accessibility for all, or co-location of community facilities and uses to ensure communities are active during the day and into the evening

Clúid is a keen advocate of the development of community facilities. However, it is vital that funding for community facilities is provided, given it is not currently funded within AHB funding schemes. In addition, it is important that, where community facilities are requested within a scheme, that there is a demonstrated need and demand for same. We would also welcome an extended definition of community facilities to include sports facilities.

Local authorities working with the travelling community will continue to address the specific needs of travellers, ensuring that targeted provision is achieved in line with those needs and that this is also incorporated into housing and traveller accommodation strategies, city and county development plans and local area plans

With regard to accommodation for the travelling community, the recent Report of the Housing Commission notes a 'failure of local authorities to deliver a considerable proportion of the Traveller specific accommodation they have planned for, and to draw down the funding provided by the Department of Housing Local Government and Heritage (DHLGH)' (gov - Report of The Housing Commission (www.gov.ie) p. 211).

Thus, in order to ensure that Traveller accommodation is provided at adequate levels and quality, we recommend the addition of a more specific Objective within the Framework, requiring the provision of Traveller accommodation in line with real need in the local authority, based on the Social Housing Assessments, homelessness levels and adequacy of existing accommodation.

'In moving towards a more diverse society over the last half century, Ireland's population is more varied than ever before, comprising a range of ethnicities and nationalities...

National Policy Objective 39 - Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.

Given the absence of reference to ethnic diversity in the 2018 Framework, we welcome this statement. However, the Objective, is, in our view, overly vague, particularly in light of recent migration trends. We would therefore welcome the addition of an Objective referencing a requirement for a proactive approach by local authorities and AHBs, to ensure that ethnic diversity is celebrated and that people of all ethnicities and nationalities living in social and affordable housing are well integrated within their communities.

To promote the increased supply of housing in a planned and sustainable manner and to encourage the regeneration of vacant and idle lands in urban locations, the Residential Zoned Land Tax was introduced in the Finance Act 2021, as a new tax aimed at activating zoned and serviced residential development land.

It is our view that the previously proposed Residential Zoned Land Tax (RZLT) should proceed as initially planned in 2025. In order to provide more social and affordable housing, land hoarding and speculative practices should be strongly discouraged, in order to unlock land and limit land costs, with any reasonable exemptions for active farmland considered.

While apartments made up 13% of all occupied households in Ireland and 38% of occupied households in the Dublin City Council area in 2022 (Census data), we are a long way behind European averages in terms of the numbers and proportion of households living in apartments, especially in our cities and larger towns. In many European countries, it is normal to see 40%-60% of households living in apartments. To more effectively address the challenge of meeting the housing needs of a growing population in our key urban areas, it is clear that we need

to build inwards and upwards, rather than outwards. This means that apartments and compact housing models will need to become more prevalent, particularly in Ireland's cities.

We welcome the reference to the low levels of apartment-living in Ireland. However, we believe that this will not be remedied via construction of apartments alone. We must instigate a cultural shift and increase the attractiveness of apartment living in Ireland. Key to this will be the reform of the Multi-Unit Developments Act 2011, as promised in the Programme for Government. Clúid has been a keen advocate of such reform for many years.

The provision by Government of housing supports for those unable to provide for accommodation from within their own resources is a key social policy and it affects a significant proportion of the population.

We are cognisant that this statement uses language used in the Housing Act, 1988. Nonetheless, we would welcome a reference to the positive impact of social and affordable housing on the entire housing market, in terms of stabilising rents and house prices, and on our economy and society, in terms of enabling access to employment and benefitting mental and physical health.

Adding more properties to areas that are already dense with social housing...create serious problems within communities. Diverse neighbourhoods with a balance of public and private housing can create more sustainable and healthy communities.

Given the quality, management and kinds of households living in social housing are not homogenous, we do not believe this statement to be helpful. It is important that societal stigma relating to social housing does not serve to limit the development of social housing where it so urgently required. That said, where an income mix within a housing development is deemed appropriate or desirable, we believe that, given the introduction of cost rental housing, this can now be achieved in ways other than solely a 'balance of public and private housing'. In recent years, we have developed very successful housing schemes comprising a mix of social and cost rental homes.

In order to ensure that the plan-making system continues to be supported by robust methodology and data to inform policies and funding initiatives around housing and associated land requirements, Housing Need Demand Assessments (HNDAs) developed by each Local Authority will be updated to align with updated data sources, in order to support the preparation of housing strategies and all related housing policy outputs, e.g. city and county development plans, local area plans, traveller accommodation plans etc

We very much welcomed the introduction of the HNDAs, allowing for a data-driven approach to future demand assessment.

However, we would agree with the assessment of the Housing Commission that 'the HNDA methodology is in principle the correct one, but that its application in the Irish context has been problematic due to the key parameter inputs used.'

We also note the reference, by the Commission to the 'the inappropriate referencing of HNDA results to argue for a cap on housing development in particular localities.' www.gov.ie/pdf/?file=https://assets.gov.ie/294018/e1aae1ed-07c4-473d-811e-3426756321ee.pdf_p.32 and believe a reference to this, within the Framework, would be worthwhile.

National Policy Objective 90 Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green and blue infrastructure planning and innovative design solutions.

We welcome the inclusion of this Objective - the promotion of healthy and energy efficient buildings and homes, in terms of Indoor Environmental Quality (IEQ) is essential. Improving the energy efficiency of our homes and making them healthier must go hand-in-hand. While decarbonising our homes is critical to reaching our climate targets, health risks from poor indoor air quality, insufficient light, dampness and noise pollution must also be addressed.

Other comments

We note that there is no reference to modular housing or Modern Methods of Construction within the Framework. Given its increasing prevalence and importance in addressing housing need, we would advise that a reference to this is included in the final document.

Documents Attached: No
Boundaries Captured on No
Map: