

12 September 2024

First Revision to the National Planning Framework Consultation  
Department of Housing, Local Government and Heritage  
**Via Consultation Portal**

Dear Sir / Madam

## **CONSULTATION RESPONSE TO THE FIRST REVISION OF THE NATIONAL PLANNING FRAMEWORK**

Further to this consultation on First Draft Revision to the National Planning Framework (NPF), this response is made on behalf of Avison Young Planning & Regeneration Ltd.

Avison Young is a multi-disciplinary planning and commercial real estate consultancy, with its Irish office located in Dublin.

This submission responds to the updates to the First Revision to the NPF and identifies parts of the Framework that could benefit from further consideration. This submission is structured around the themes of: Overarching Vision and Growth Strategy, Housing, Transport, Climate Change & Energy, Environment, and Infrastructure.

A central theme of this response is to highlight the importance of underpinning the Framework with a robust evidence base, with a clear rationale for the chosen policy updates/additions.

### **Vision and Strategy for Managing Growth**

The continuation of the overarching Vision and Strategy for Managing Growth (as described in Section 1.2) is welcomed, in order to maintain consistency and to enable the strategy to be implemented in full to 2040. It had been anticipated that this First Revision of the NPF would make further provision for facilitating delivery of new development, in particular housing and infrastructure, to meet the needs of a growing population, by providing essential services for communities, and continue to attract investment required to maintain a prosperous economy.

Given our recommended emphasis on the NPF evidence base, it is respectfully submitted that the population growth figures, provided in Tables 4.1 and 10.1, are critically reviewed. In comparison with growth in NPF2018 the Table 10.1 states an increase in the overall State Total Population projection to 2040 (from 5.8m to 6.1m), however each of the regional growth projections are downgraded, which results in lowered city population growth projections (Table 4.1).

Updated objective NPO16 will maintain the growth bias in favour of Dublin, and a reduced growth ambition for Cork, Limerick, Galway and Waterford cities compared to the targets in NPF 2018. Soundness of this strategy can only be demonstrated by the collation and critical analyses of a robust evidence base.

While the objectives of the growth distribution strategy are supported, it has been reported that they haven't been achieved to date, with unbalanced regional growth, urban sprawl, and acting to constrain economic growth in Dublin. Critical evaluation and analysis of evidence relating to these issues is required to inform future growth distribution and ensure that the strategy objectives are achieved over the remainder of the NPF period to 2040.

Ultimately, it is vital that our regional cities are enabled to thrive, in terms of population growth, economic vitality and service provision, and that the projected growth for Dublin is planned and sustainable.

### **Housing**

The continuing focus on delivering compact growth, outlined in NSO1, and the introduction of Transit Oriented Development (TOD) in NPOs 9 and 93, is fully supported. Establishing funding arrangements, as described in NPO95, will be fundamental for ensuring delivery of key enabling infrastructure to create sustainable and well-functioning places.

The increased housing target is welcome in the context of increasing supply and addressing historic under-provision constraints. This is an essential step towards addressing the ongoing housing crisis, however the level of increase requires further review and must be informed by robust evidence.

It is respectfully recommended that the annual delivery target of 50,000 units is critically reviewed, considering the recent independent and Government commissioned reports indicating far greater housing targets are needed to address both current and pent-up demand. It is suggested that The Housing Commission Report's target of 60,000 units per year should be considered a more accurate target to enshrine in national policy.

Further to this, it is recommended that the following aspects are given careful consideration in finalising the annual housing targets:

- Sufficient Zoned & Serviced Land is made available in the NPF period to meet demand; this is particularly pertinent in the EMRA region to prioritise addressing the long-term shortfall anticipated. This was highlighted by the recent A&L Goodbody *Residential Land Availability* Report which recommended the provision of at least 40% additional zoning. The NPF must equip planning authorities with appropriate strategic policies that will enable them to zone residential land where the demand for homes is greatest, through the development plan process.;
- Policy provisions that enable alignment between the delivery of new housing and supporting infrastructure to allow development to come forward at pace and to create successful, sustainable places;
- Creating certainty around the Planning System to ensure the construction sector is not hindered in bringing forward development sites by unnecessary zoning and strategic reserve restrictions, where there is clear pent-up demand and supply constraints existing in the area;
- As noted, the inclusion of TOD, in the context of housing development, is welcomed and suggest that Government policy should be focusing on establishing clear Section 28

Guidelines that influence and impact future TOD policy that has legislative backing and clarity to the model's role in development; and

- Prioritise the role of standardised design and compact home guidelines to give clarity and certainty for developers/builders in a new density-conscious model, that can be implemented in housing projects across Urban & Rural Ireland.

### **Transport**

The increased emphasis on delivering sustainable travel networks and reducing private car use is fully supported. The NPF should require that appropriate procedural and funding arrangements are put in place to promote and deliver genuine alternatives to private car use, in order to make meaningful steps towards changing travel behaviour.

Similarly, the support in the NPF for electric vehicle use and investment required in charging infrastructure is welcomed, noting the inclusion of new targets in NSO5. The NPF should ensure that grid infrastructure can be developed or enhanced to support increased demand from the growing network of EV charging points.

### **Climate Change & Energy**

As an overarching point, references to meeting specific legislative targets in the updated NSO8 is welcomed, given the critical importance of the role the built environment plays in mitigating climate change. It will be a challenge to meet these targets, and the NPF must therefore equip planning authorities with the ability to set appropriate policy requirements at Development Plan level to ensure new development has the requisite sustainability credentials.

The inclusion of new and revised objectives relating to the delivery of additional renewable electricity capacity and associated infrastructure is supported, and will facilitate our transition from relying on power generated from fossil fuels.

Support for growing and developing alternative energy sources is also welcome, including district heating and geothermal energy systems. However, as with other infrastructure, there is the need to ensure that the requisite procedural and funding arrangements are in place to enable delivery.

### **Environment**

We are supportive of the updated NSO9 and new NPOs 83, 84, 85 and 86 that relate to conservation and enhancement of existing resources and the delivery of associated infrastructure. It is important that the appropriate balance is achieved between delivering new development and protecting the receiving environment; the strategic policy framework provided by the NPF is fundamental to ensuring that this balance is achieved at the local level.

### **Infrastructure**

The proposed update of NSO9 is welcome, as it relates to the enhancement of waste and water network infrastructure.

By extension, NPO101 is also welcome as it relates to aligning infrastructure delivery to serve priority zoned lands. Alignment of infrastructure installation and development delivery is critical to ensuring that new development is not delayed due to insufficient infrastructure capacity. This NPO can only be achieved if the necessary procedural and funding arrangements are in place at the right time to enable delivery of infrastructure, and the Framework should include the necessary provisions for this.

**Summary**

In summary, the continuation of the overall vision and strategy in this First Revision is supported. We note however the opportunity for further consideration in some areas, particularly relating to population growth projections and housing targets. Ireland is currently experiencing an acute housing shortage and infrastructure deficiencies, and will require strategic planning policy to be a significant influence in addressing these issues. For the Framework to be successful, it must include provisions that facilitate the delivery of the appropriate quantum of new development, in the right locations, and with the necessary enabling infrastructure. The Framework must also be supported by a fully functioning planning system in order that its strategic and policy objectives can be implemented and new development is delivered.

We trust that the points made will be given due consideration.

Yours faithfully,



**Brian Kelly**

**Principal**

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**For and on behalf of Avison Young Planning and Regeneration Limited**