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Draft First Revision to the National Planning Framework

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Observations:

1. The Vision

Chapter: 1. The
Vision

Failure of the National Planning Framework to deliver on key aims

One of the major goals of the National Planning Framework is to promote compact growth in our towns and cities. On page 52 the draft framework states that compact growth will reduce the harmful impacts on the environment by:

- Reducing land take, preserving agricultural land and habitats;
- Utilising existing infrastructure, buildings and sites and reducing the need to travel long distances, which will reduce energy consumption and carbon emissions;
- Improving the viability of public transport services and sustainable and electric mobility infrastructure;
- Improving the provision and viability of water services, and
- Enhancing public health by encouraging and facilitating more active lifestyles by creating a more walkable and cycling friendly urban environment.

These are all laudable aims, but the outcome from the 20 years of the National Spatial Strategy and the National Planning Framework is a failure to deliver on these aims:

- "Data from Census 2022 indicates that an increased number of Dublin-based workers are now commuting longer distances" page 27
- "The Midlands Regional area comprises counties Laois, Longford, Offaly and Westmeath. These counties are not located immediately adjacent to Dublin, but the wider influence of the Metropolitan area is resulting in substantial population growth at an unsustainable rate in some settlements" page 28
- "A significant proportion, or more than half of Ireland's largest towns measured in terms of population, are located within the Dublin or Cork city regions. While these towns are economically active in their own right, many function as commuter settlements for employees working in Dublin and Cork and have a low ratio of jobs to residential workforce." page 53

- "A number of larger settlements of more than 10,000 people are characterised by very low ratios of jobs to resident workforce, having around 2,500 jobs or fewer in 2016, mainly commuter settlements that have undergone rapid residential expansion in recent decades. This type of commuter-focused residential development is similarly apparent in respect of many smaller towns, located within the larger city regions." page 53
- "There is also a category of historically larger towns, mainly in Leinster, that experienced significant commuter based residential growth during the same period, but not jobs growth, in part due a decline in traditional industrial and process-based employment. These include, for example, Balbriggan, Navan and Portlaoise, three of Ireland's fastest growing large towns between 1996 and 2022, where the population has grown rapidly, without equivalent increases in jobs." page 53

Affordable Housing

The National Planning Framework has failed also to deliver affordable housing in Ireland, with prices continuing to rise, and many people can no longer afford to live in our cities – in particular in Dublin.

This is resulting in key services being understaffed. This has shown up in recent weeks with a serious shortage of teachers in the Dublin region, but an abundance of teachers applying for jobs in the north and west of the country.

Foreign Direct Investment into Ireland is also being put in danger by the lack of affordable housing.

Why is the National Planning Framework Failing to deliver?

The plan has two key flaws:

1. It's over emphasising compact growth, when the country needs a mixture of both compact growth in town and city centres, but also needs more traditional forms of housing at the periphery of our cities and towns – especially those towns and cities with high levels of employment.
2. It's attempt to foster balanced regional development by curtailing natural growth in Dublin and other cities.

Why is Compact Growth Failing to Deliver

There are a lot of benefits to compact growth in our town centres, but it is not enough to deliver what we need.

Without a planning system cities grow by:

1. becoming more dense in their centres,
2. by expanding at the periphery.

Ireland has struggled to provide enough houses over the last 20 years because it's been difficult to develop in our town and city centres, but also because we are artificially restricting development at the edges of our cities.

The National Planning Framework is aiming to make it easier to deliver homes in our town and city centres. This is welcome, but it is not enough to meet the demand.

Furthermore, while many people are happy to live in compact developments, many others prefer more traditional housing, and as people can't find the housing they want near their employment, they are moving further away and undertaking long commutes.

So, the framework is causing further dispersed development – the very issue it is trying to address with compact development.

Expensive High Rise is often not financially viable, so nothing gets built

The rigidity of our planning system is resulting in no development in areas where there is a high demand for development. For example, in Ballymun, the planning system will only allow expensive, high density development – apartments that will cost at least €450,000 to buy. But the cost of buying a standard two-storey home in the community is around €250,000. Who can sell an apartment at €450,000 when houses are on sale for €250,000? As a result large tracts of prime development land have stood empty for about 20 years.

This scenario is replicated in many other places around the country.

Compact Growth may lead to social challenges in the future

Neave Brown, 2018 laureate of RIBA Royal Gold Medal for architecture in the UK, says:

“High buildings should only be used for the very rich because they're the only ones that can be done with proper lifts, proper services, proper control, proper entrances and the proper environment.”

Speaking of council housing in the UK he said, “We never committed the money to maintain, look after tenant control, building control, maintenance for the life of the building.”

If we provide social housing as apartment living, are we going to supply the proper lifts, services, control, entrances and environment? We don't have a good track record in this regard.

Compact Development and the Price of Housing

Not only are the restrictions on supply at the periphery reducing the supply of housing, it is also reducing the supply of affordable housing. This is because compact development is expensive development. The Society of Chartered Surveyors of Ireland's report on apartment costs – typically over €400,000 in Dublin.

In contrast, you can buy a factory-made, 40 m2 log cabin for around €50,000.

Balanced Regional Development

A second major aim of the framework is to deliver balanced regional development. Again, this is a reasonable aim. But the way this is to be delivered is to put limits on the growth of the Dublin region and our other four cities.

But putting limits on the growth of Dublin and our other cities will do serious damage to the potential growth of the entire country.

Most of the highest paid jobs in the country are provided by companies looking for the best talent in the country. And the reason they chose Dublin is because it is the biggest population centre, so it's the biggest talent pool. Restricting housing or restricting investment will not switch investment to other parts of the country. It will just force investment out of the country.

What should be in the National Planning Framework

The plan should continue to facilitate city and town centre development, but it also needs to recognize the need for lower density, affordable development on the edge of our towns and cities. This can be done in a controlled manner. It should be focused on the towns and cities where there is plenty of employment but not enough housing. Towns like Sligo and Athlone, and cities like Dublin.

How Can we Promote Balanced Regional Development

International evidence is clear that the best way to promote balanced regional development is to give more power and autonomy to local and regional governments.

As things stand, councils and elected officials face all the downsides of growth, but get none of the benefits. If there were more upsides to growth for local policy makers – such as increased income from property taxes, they would be more supportive of policies to encourage growth, as they could then deliver improved services and infrastructure for their communities.

Easy Wins

- Allow for small scale residential development in back gardens – Seomrai
- Allow people to extend their attics at the back of their homes as exempted development
- Allow for Mansard Roofs as exempted development
- Allow neighbourhood votes to increase density

Documents Attached: No
Boundaries Captured on No
Map: