



Outhouse
LGBTQ+ CENTRE

105 Capel Street, D01 R290, Ireland

11 September 2024

To Whom It May Concern,

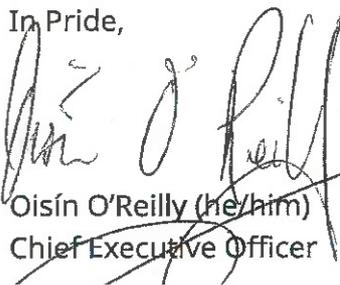
I am writing on behalf of Outhouse LGBTQ+ Centre to submit our response to the public consultation on the Draft National Planning Framework. As a key support and advocacy organisation supporting the LGBTQ+ community, we have a vested interest in ensuring that the National Planning Framework adequately addresses the unique needs of LGBTQ+ individuals across Ireland.

Our submission highlights critical areas where the framework can foster a more inclusive and supportive environment for LGBTQ+ people, particularly in relation to housing, community facilities, public space, and safety. We believe these considerations are essential to achieving a truly equitable and diverse society, as envisioned by National Policy Objective 39.

We appreciate the opportunity to contribute to this consultation and look forward to the continued development of an inclusive framework that serves all communities.

Thank you for your time and consideration.

In Pride,



Oisín O'Reilly (he/him)
Chief Executive Officer

[Redacted -personal information]

**SUBMISSION TO THE CONSULTATION ON THE
DRAFT NATIONAL PLANNING FRAMEWORK**
Department of Housing, Local Government, and Heritage

September 2024



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LGBTQ+ CENTRE

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About Outhouse LGBTQ+ Centre

Outhouse is the cornerstone of support for the LGBTQ+ community. We provide a safe and welcoming space for LGBTQ+ individuals to gather, connect, and find solace in a world that doesn't always understand or embrace them. We are the heartbeat of the queer community, offering vital services, including social spaces, mental health support, cultural events, and much more.

We are dedicated to supporting the people, spaces, and issues important to the LGBTQ+ communities. Our vision is a future where LGBTQ+ individuals are safe, seen, and celebrated.

Our mission is to improve the quality of life for LGBTQ+ people by providing a safe space to find:

- **Connection** - discovering themselves, their people, place, and passions.
- **Community Support** - accessing information, programmes, and services.
- **Culture** - experiencing creativity, heritage, discovery, and fun.
- **Campaigns** - being part of a strong, credible, and trusted voice for LGBTQ+ communities.

We live by the values of Trust, Respect, Joy, Inclusion, and Impact. Our commitments to equity and intersectionality underpin our work.

LGBTQ+ Rights in Ireland Today

Ireland has made significant strides toward achieving greater equality and inclusion for the LGBTQ+ community through successful referendums, progressive legislation, and more inclusive public policies. These advancements reflect Ireland's commitment to creating a more equitable society. However, despite this remarkable progress, the LGBTQ+ community continues to face profound challenges within our society. Discrimination, harassment, and inequalities persist, casting long shadows over the lives of LGBTQ+ individuals. Mental health issues remain prevalent, and the weight of isolation can be crushing. Additionally, poverty, homelessness, and substance misuse disproportionately affect LGBTQ+ individuals, significantly impacting their day-to-day lives.

Positive policy developments, such as the publication of two national LGBTQ+ inclusion strategies, have been encouraging. However, government funding for

LGBTQ+ organisations remains sporadic and insufficient to meet the community's demand for services or the scale of resources needed to foster societal transformation. The lack of consistent financial support and infrastructure investments significantly hinders LGBTQ+ support and advocacy organisations' ability to provide essential services and support to LGBTQ+ communities, ultimately slowing progress for the most vulnerable and marginalised.

Research from the EU Agency for Fundamental Rights underscores the economic challenges faced by the LGBTQ+ community in Ireland, revealing that two out of five Irish LGBTQ+ individuals struggle to make ends meet, with this figure rising to half of Trans and Intersex people. One-third of LGBTQ+ people experience housing difficulties, exacerbating financial instability and health inequalities. Furthermore, research from Bank of Ireland highlights that LGBTQ+ individuals are more likely to rent their homes, adding further pressure on personal finances in the current dysfunctional housing market. This overrepresentation in the high-cost rental market, coupled with lower disposable incomes, creates significant barriers to financial stability and overall well-being for LGBTQ+ people in Ireland.

Despite advancements, LGBTQ+ individuals continue to face significant challenges related to housing and homelessness. While not the only area of concern, the intersection of financial strain, housing instability, and the fear of discrimination in emergency accommodations highlights the urgent need for targeted support and inclusive housing policies.

As we look to the future, it is clear that addressing the intersecting needs of the LGBTQ+ community requires a multi-dimensional approach. The Department of Housing, Local Government, and Heritage has a pivotal role in developing and implementing inclusive strategies and fostering collaboration to build a more equitable, inclusive, and supportive society for everyone. Integrating LGBTQ+ voices and needs within the National Planning Framework (NPF) is essential to effectively addressing the unique challenges faced by our community, ensuring that all individuals can enjoy equal opportunities and a better quality of life.

Introduction

The draft National Planning Framework (NPF) outlines a high-level strategic plan for shaping the future growth and development of Ireland up to the year 2040. While the draft framework demonstrates a commendable commitment to fostering a diverse and inclusive society, it is notable that it does not specifically address the needs and concerns of LGBTQ+ individuals. With an estimated 7.5% of Ireland's population of 5.127 million identifying as LGBTQ+, the omission of targeted provisions for this significant demographic is a stark gap. Given the NPF's overarching aim to guide the nation's social, economic, and cultural development, it is imperative that the framework explicitly includes and supports the LGBTQ+ community to fully realise the objectives of National Policy Objective 39—planning for a more diverse and socially inclusive society.

Addressing the Needs of LGBTQ+ Individuals

The NPF rightly emphasises the importance of balanced regional development, but it must also consider the unique challenges faced by LGBTQ+ individuals in both urban and rural contexts combined with their intersectional identities. Urban areas often provide more visible and accessible LGBTQ+ communities and resources. However, without intentional planning and investment, even these areas can fail to support LGBTQ+ people adequately.

For example, planning decisions should consider the creation and maintenance of LGBTQ+ community centres, safe and inclusive public spaces, and housing that meets the needs of diverse household structures. In rural areas where LGBTQ+ individuals face greater isolation, the NPF should encourage initiatives that promote visibility, support networks, and community engagement and deal with the challenge of access to these in a rural setting.

Inclusive public spaces can play a crucial role in advancing the cultural and social development of LGBTQ+ communities. By fostering visibility and providing platforms for LGBTQ+ expression and culture, public spaces can contribute to broader societal acceptance and integration.

To achieve National Policy Objective 39, the NPF should incorporate specific actions that promote the visibility and inclusion of LGBTQ+ individuals in public spaces. This could include guidelines for the design of public spaces that consider LGBTQ+ needs, support for events and cultural activities that celebrate

LGBTQ+ identities, and the integration of LGBTQ+ history and culture into the public realm.

Community Facilities

Investing in dedicated community centres & facilities for LGBTQ+ individuals across Ireland is essential to fostering a more inclusive, supportive, and equitable society. These facilities serve as vital safe spaces where LGBTQ+ people can connect, access services, and engage in personal growth and development. Given the unique challenges faced by the LGBTQ+ community, such as higher rates of discrimination, mental health issues, and social isolation, the provision of these facilities is not just beneficial but necessary.

Community centres specifically for LGBTQ+ individuals offer a place where people can feel safe and accepted, free from the judgment and prejudice that they might experience in other public spaces. These centres provide an environment where LGBTQ+ people can build supportive networks, access crucial services, and participate in community activities that affirm their identities and promote their overall wellbeing.

Moreover, dedicated LGBTQ+ community centres play a critical role in service delivery. They often host or partner with organisations to provide essential services such as mental health support, sexual health services, legal advice, and educational programs. These services are tailored to the specific needs of LGBTQ+ individuals, ensuring that they receive the appropriate care and support that is lacking in more general mainstream service settings.

Beyond immediate service delivery, these centres contribute to the personal growth and development of queer individuals. They offer opportunities for skill-building, leadership development, and cultural expression, helping LGBTQ+ people to thrive in all aspects of their lives. From youth programs to elder support, these centres cater to the diverse needs of the community at different life stages, fostering resilience and empowerment.

Given the importance of these facilities, the National Planning Framework (NPF) should explicitly require that the needs of LGBTQ+ people be considered in the provision of community and healthcare facilities and that dedicated safe spaces be prioritised to ensure the needs of the community are met. This planning is crucial to ensuring that all regions of Ireland are equipped with the infrastructure needed to support LGBTQ+ individuals, promoting equality of

opportunity and a better quality of life for all residents, in line with National Policy Objective 39.

Housing

The unique housing needs of the LGBTQ+ community must be explicitly recognised and addressed within the National Planning Framework to ensure equitable access to safe and inclusive housing. LGBTQ+ individuals often face distinct challenges in securing housing, including discrimination, financial instability, and social isolation. Safe and accessible housing is not just a basic need but a critical foundation for ensuring wellbeing.

The National Planning Framework should support diverse housing models that are fit for purpose, accommodating the varied living arrangements and housing makeups that exist within the LGBTQ+ community. This includes promoting the development of LGBTQ+ housing cooperatives, which can provide supportive and affirming living environments and intergenerational living and care. Additionally, there is a pressing need to resource the development of dedicated LGBTQ+ homeless accommodation with wraparound services, ensuring that vulnerable individuals have access to safe spaces equipped with the necessary specialist support.

Furthermore, the Framework should consider allowing LGBTQ+ individuals to be co-located in social and affordable housing schemes, fostering a sense of community and belonging while lessening social isolation. By integrating these considerations into housing policy, the National Planning Framework can help create a more inclusive and supportive housing landscape for LGBTQ+ people across Ireland.

Safety

Ensuring the safety and wellbeing of the LGBTQ+ community involves not only robust policing and legal protections but also thoughtful urban design and community infrastructure. Good urban design plays a vital role in ensuring safety and fostering inclusivity. Well-designed public spaces and community facilities specifically tailored for LGBTQ+ individuals contribute significantly to their sense of security and belonging. These spaces not only provide safe environments but also encourage community cohesion and support networks.

Ireland's lack of effective hate crime legislation highlights the urgent need for the Criminal Justice (Incitement to Violence or Hatred and Hate Offences) Bill 2022 to be enacted without delay.

Trust between LGBTQ+ individuals and An Garda Síochána remains a concern, necessitating consistent and meaningful engagement and the reconvening of the Garda National Diversity and Integration Forum to enhance dialogue with civil society organisations. Garda Diversity Officers (GDOs) are crucial in building this trust and must be supported with adequate resources.

Incorporating LGBTQ+ representatives into Local Community Safety Partnerships (LCSPs) is essential for addressing specific safety needs and ensuring comprehensive community safety plans. Additionally, ongoing training for Gardaí on LGBTQ+ issues, including intersectionality, and improved data collection on crimes against LGBTQ+ people are critical to enhancing safety.

With LGBTQ+ individuals remaining among the top groups targeted by hate crimes in Ireland, addressing these issues through effective policies, inclusive urban design, and supportive community infrastructure is vital for achieving National Policy Objective 39 and ensuring the full inclusion and protection of LGBTQ+ individuals.

Economic Development

Economic development strategies must address the unique barriers faced by LGBTQ+ individuals, particularly those experiencing intersectional discrimination. Despite overall economic progress since the end of austerity, many LGBTQ+ people still face significant challenges that hinder their full participation in the economy.

LGBTQ+ individuals, especially those also belonging to other marginalised groups, such as racial minorities or people with disabilities, often encounter compounded discrimination in the workplace. This can result in unequal pay, limited career advancement opportunities, and an unwelcoming work environment, affecting their immediate economic stability and long-term professional growth.

Many LGBTQ+ people also deal with unstable housing situations exacerbated by high living costs. Discrimination in the rental market and the need for safe and accepting housing contribute to their economic instability and overall well-being, especially for those facing financial hardships.

The economic recovery since the end of austerity has not been evenly distributed. LGBTQ+ individuals, especially those with an intersecting identity, have not fully shared in this progress, often facing lower incomes, higher unemployment rates, and greater financial insecurity compared to their non-LGBTQ+ counterparts.

Economic development policies must include specific measures tailored to the needs of LGBTQ+ individuals to address these issues. The draft National Planning Framework should explicitly address these barriers, with targeted support for workplace inclusion, equitable housing opportunities, and specialised economic support programmes. Without such measures, the draft risks perpetuating existing inequalities and failing to ensure that economic development benefits are equitably shared.

Climate Change

Research and analysis should be commissioned to understand how climate change uniquely impacts minoritised and vulnerable population groups, including LGBTQ+ individuals. Historical evidence demonstrates that during periods of significant societal upheaval, it is those on the margins who are often affected first and most severely, and who face the longest path to recovery, if they recover at all.

In this context, the effects of climate change on LGBTQ+ people are of critical concern. As an existential threat that impacts everyone, it disproportionately affects those who are already vulnerable. To address this, public policy must incorporate specific measures to mitigate the unique challenges faced by LGBTQ+ individuals and other minoritised, vulnerable, and marginalised population groups. These measures should be integrated into this and future revisions of the National Planning Framework (NPF) to ensure that climate adaptation strategies are inclusive and equitable. By addressing these disparities proactively, we can better safeguard the wellbeing of all communities in the face of climate change.

Planning and Participation

The National Planning Framework should integrate a comprehensive equity and inclusion review process into urban planning and development projects. This process must assess the unique needs of vulnerable and marginalised

populations, including LGBTQ+ residents, and evaluate the effectiveness and impact of proposed measures on these groups.

To ensure that city and county development plans adequately reflect the needs and perspectives of all communities, it is essential to establish mechanisms that actively encourage and support the participation of vulnerable and minoritised groups. This involves not only creating opportunities for their involvement but also providing the necessary resources to facilitate meaningful engagement. By incorporating diverse voices and addressing specific concerns, the planning process can better align with National Policy Objective 39, promoting a more inclusive and equitable urban environment for everyone.

Public Space

Research has highlighted the significance of public spaces that are inclusive and supportive of LGBTQ+ individuals. Public spaces are not merely physical locations; they are social arenas where people interact, express themselves, and experience a sense of belonging. For LGBTQ+ individuals, these spaces can be vital in affirming identity, fostering community connections, and promoting social integration.

However, research has also underscored that LGBTQ+ people often face exclusion, invisibility, or even hostility in public spaces. The lack of inclusive planning can lead to environments that do not cater to our needs, thereby perpetuating marginalisation. To address this, it is crucial that the NPF integrates the principles of queer public space into its planning processes, ensuring that public spaces are designed to be welcoming, safe, and affirming for LGBTQ+ individuals.

The Principles of Queer Public Space

Visibility and Representation:

- Queer public spaces ensure that LGBTQ+ identities and cultures are visible and represented within the public realm. This visibility challenges heteronormative assumptions and fosters a sense of belonging for LGBTQ+ individuals.

Safety and Inclusivity:

- These spaces are designed to be safe, welcoming, and inclusive for all, particularly LGBTQ+ people who often face discrimination or exclusion in traditional public spaces. Safety includes both physical security and a sense of psychological comfort.

Accessibility and Usability:

- Queer public spaces are accessible to all members of the LGBTQ+ community, regardless of their gender, sexual orientation, age, ability, or socioeconomic status. This principle emphasises the need for universal design and removing barriers that may prevent access.

Flexibility and Fluidity:

- These spaces are flexible and adaptable to the diverse and evolving needs of the LGBTQ+ community. They support a variety of activities and uses, from social gatherings to political activism, reflecting the fluid and dynamic nature of queer identities.

Community and Connection:

- Queer public spaces facilitate community-building and social connections among LGBTQ+ individuals. They provide places where people can meet, interact, and form supportive networks, which are crucial for the well-being and resilience of the community.

Cultural Expression and Celebration:

- These spaces offer platforms for the cultural expression and celebration of LGBTQ+ identities, histories, and achievements. They are often sites for events, performances, and other activities that celebrate queer culture and foster a sense of pride.

Resistance and Empowerment:

- Queer public spaces often serve as sites of resistance against discrimination and oppression, empowering LGBTQ+ individuals to assert their rights and identities. They play a critical role in advocating for social change and advancing equality.

Other Observations and Inputs

Public Sector Human Rights and Equality Duty

Under the Irish Human Rights and Equality Commission Act 2014, the Department of Housing, Local Government, and Heritage, like all public bodies, must include an assessment of the human rights and equality issues relevant to its functions within its strategic planning. The Department must also outline the actions it is taking or proposes to take to address these issues.

Despite the significant challenges faced by the LGBTQ+ community and other marginalised groups across Ireland, the draft National Planning Framework (NPF) does not adequately reference or plan for the unique needs of all of these communities. To genuinely fulfil its public sector duty and human rights obligations, the Department must explicitly include and address the needs of LGBTQ+ individuals and other protected groups under equality legislation within the NPF.

The current draft of the NPF risks perpetuating invisibility for LGBTQ+ people, with no specific reference to our communities or our distinct needs. Without explicitly including the needs of LGBTQ+ people in these policy areas, it is difficult to see how the Department fulfils its obligations under the Irish Human Rights and Equality Commission Act 2014. This Act requires public bodies to assess and address human rights and equality issues relevant to their functions, which cannot be achieved under the proposed framework without explicit and meaningful inclusion.

By explicitly addressing the needs of the LGBTQ+ community and other marginalised groups within the National Planning Framework, the Department of Housing, Local Government, and Heritage can ensure a more comprehensive and equitable approach to human rights and equality. This would not only fulfil its legal obligations but also promote a genuinely inclusive society, in line with the principles of the NPF and National Policy Objective 39.

Tangible Indicators and Accountability in Framework Delivery

A crucial element for the framework's success is the establishment of tangible indicators and robust accountability mechanisms to ensure the delivery of commitments. Without these, the framework risks falling short of its goals, leaving the LGBTQ+ community underserved and vulnerable.

Costing and Budget Assignment for Framework Implementation

For the framework to be effective, all proposed actions must be thoroughly costed, and a dedicated budget must be assigned for the framework's entire duration. Clear and transparent financial planning ensures that each initiative has the necessary resources for successful execution. Without allocated funding, even the most well-intentioned actions risk being under-resourced and failing to achieve their desired impact. A well-defined budget not only demonstrates a genuine commitment from the government but also allows for better planning, monitoring, and accountability.



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