

Submission on Draft National Planning Framework – Ireland 2040

Client: Kilbride Estates Ltd.





Description:

Submission on Draft National Planning Framework – Ireland 2040

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Kilbride Estates Ltd.



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1 INTRODUCTION

1.1 Introduction

- 1.1.1 In September 2017 the Department of Housing, Planning, Community and Local Government published the Draft National Planning Framework – Ireland 2040 and invited submissions or observations on the proposed policy document.
- 1.1.2 Kilbride Estates Ltd. Have requested ILTP to review the Draft NPF and where appropriate to make a submission on its behalf.
- 1.1.3 The proposal to replace the existing National Spatial Strategy (NSS) is broadly welcomed by our client. The NSS (2002) failed to deliver balanced sustainable economic and population growth throughout the state and its replacement is long overdue.
- 1.1.4 Indeed, the NSS (2002) was overly prescriptive and not sufficiently flexible to ensure that the planning process could respond, in a timely fashion, to changes in population growth, employment growth and economic circumstances, but instead was restricted to the confines of the NSS in terms of where housing and jobs were to be located. This confined many planning authorities to not even be allowed to consider otherwise worthwhile and sustainable development proposals that were not strictly in conformity with the NSS.
- 1.1.5 The National Planning Framework (NPF) should learn from the shortcomings of the NSS and allows sustainable development in appropriate location to be brought forward in a timely fashion. Unfortunately, the Draft NPF has itself significant shortfalls, which if not corrected will result in the NPF failing to deliver balanced sustainable economic growth and prosperity as was the case with the NSS.

1.2 Wider Context

- 1.2.1 The wider context of the NPF is worth reiterating in this context. This includes:
- Need to tackle the National Housing Emergency
 - Need to meet our Paris 2015 emission targets
 - Take national action on World Health Organisation (WHO) forecast of over 80% clinical obesity in Ireland by 2030
 - Build sustainable new communities for all age cohorts and socio-economic groups
 - Reduce time spent travelling, thereby increasing community participation
 - Create increased opportunities for exercise and leisure pursuits and encourage greater community participation by local residents

1.3 Process of Delivery – Required changes to be included in NPF

- 1.3.1 The planned hierarchical approach as set out in the consultation document proposes a long drawn sequential approach that quite frankly will take years to set in place. Even assuming a NPF adoption later in 2017 it would take several years for the approach to be fed into Regional Strategies, County Development Plans (CDP) and Local Area Plans (LAP). The hierarchical structure proposed in the consultation document is shown in Figure 1.1.



Figure 1.1: Ireland's Planning Hierarchy Post 2016

- 1.3.2 Given that some CDPs have recently been adopted or are currently under preparation this means that the NPF may not be effective on the ground for many years due to the fact that RSEs must be prepared post the adoption of NPF and the CDPs and LAPs would then have to be varied.



2 PROPOSED AMENSMENTS & INCLUSION TO DRAFT NPF

2.1 Meeting the Population Growth Forecast

2.1.1 The previous submission made by ILTP clearly demonstrated that past population forecasts have consistently under estimated Ireland’s population growth. This has in part resulted in the current housing crisis, particularly in the GDA as policy and land use zoning has been determined in the main by these CSO population forecast.

2.1.2 Population forecasts underpin land use planning and policy formulation, planning of infrastructure (roads, water, public transport, etc.) and in planning our future sustainable energy requirements. Therefore, it is vital for the NPF to meet its overall objectives that appropriate population forecasts are used in the final the NPF.

2.2 Draft NPF Population Forecasts Review

2.2.1 The Draft NPF intends to set a blueprint for the continued growth of the Economy over the period to 2040. It is imperative therefore that appropriate population growth targets that match the economic target of the draft NPF are included in the plan for the plan to succeed.

2.2.2 Over a 15-year period from 1996 to 2011 the population of the State grew at a rate of over 1.5% per annum. Table 2.1 shows that over each of the three 5-year census periods 1997-2001, 2002-2006 and 2007-2011 the population of the state grew by over 8% in each 5-year period. This equates to a sustained annual population increase of approximately 1.6% over a 15-year period.

Table 2.1: Population 1956 – 2016 (Source: CSO)

Census year	Population	Change	%
2002	3,917,203	291,116	8.0
2006	4,239,848	322,645	8.2
2011	4,588,252	348,404	8.2
2016	4,761,865	173,613	3.8

2.2.3 The most recent census period revealed that population grew far less in the period of 2011-2016. This was as a result of large scale emigration, the consequences of an economic crash. Therefore, this period of much lower population growth should be disregarded when planning for the future needs of the state.

2.2.4 The NPF plan is clearly seeking to avoid future economic crashes over the plan period and must therefore set realisable population growth targets that also assumed same.

2.2.5 In the case of Ireland, future population growth forecasts are better measured against the unemployment level as these in turn better reflect the economic health of the state and emigration levels.

2.2.6 The population of the State, as recently published by the CSO, showed that the population grew by almost 53,000 in 2016 alone, which is annum growth rate of over 1%.

2.2.7 The unemployment rate currently is at 6% and the economy is now on course to achieve full employment.



- 2.2.8 Ireland is now forecasted to reach full employment by 2018. ILTP forecast the population of the state will increase year on year by between 60,000 and 100,000 per annum, based on stable employment and continued economic growth, over the foreseeable future.
- 2.2.9 Based on a forecast of 8% population growth over each 5-year census period, ILTP have set out what it regards a realistic population target of inclusion in the NPF, which is illustrated as Figure 2.1.

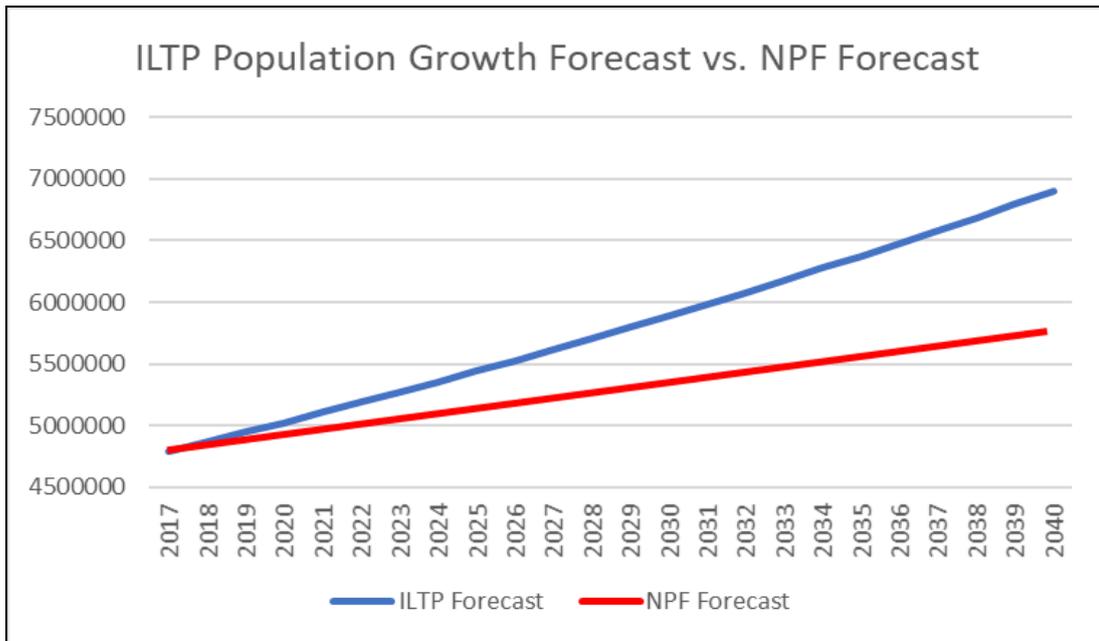


Figure 2.1: ILTP Population Growth Forecast vs. NPF Forecast

- 2.2.10 The Draft NPF forecast a population of around 5.75 million by 2040. This represents a population growth forecast of less than 1% per annum over the plan period and well short of what will be realised in the NPF delivers and sustain the economic growth of the country.

Current NPF Population Forecasts = Planning for Failure

- 2.2.11 ILTP forecasts population of almost 7m population by 2040, which is over 1million greater than the Draft NPF forecasts.
- 2.2.12 To address the shortfall in population growth targets that underpin the Draft NPF the following change is proposed to the NPF.

Proposed National Policy Objective for Insertion to NPF:

“The NPF population forecasts need to be raised to a target of 6.8m by 2040 to ensure that appropriate and matching land use and infrastructure plans are put in place to meet the plans goals as set out in the Preface.”

**Reason:**

To ensure that the NPF will be based on realistic population targets which will in turn ensure that Ireland will continue on a path of economic, environmental and social progress that will improve our prosperity sustainability and well-being

2.3 Proposed Amendment to Address Land Zoning and Delivery of Sustainable Development

- 2.3.1 It is well recognised that we have a chronic housing shortage in Ireland, which is set to continue unless more innovative methods that will boost the supply of sustainable home and communities are put in place. While the rate of housing build has increased recently, it remains well short of meeting the actual demand.
- 2.3.2 Appendix 1 and 2 of the Draft NPF are broadly welcomed, but they may take considerable time to become effective if the hierarchal approach is taken to their implementation, depending on the time lines of various planning guidance including new CDPs. Therefore, valuable time will be lost in seeing this methodology coming into effect.
- 2.3.3 We are therefore recommending that the following in respect to consideration of land use zoning:

Proposed National Policy Objective for Insertion to NPF:

“All future CDPs must have regard to and be consistent with the Methodology for a Tiered approach for Land Zoning as set out in Appendix 1 and with the Methodology for the Prioritisation of Development Lands as set out in Appendix 2 of the NPF”

Reason:

To ensure that sufficient housing lands are identified and brought forward for development in a timely manner to meet the need of the area within the lifetime of the CDP.

2.4 Proposed Amendment to NPF to Make Sustainable Housing Strategic Infrastructure for Planning Purposes.

- 2.4.1 The Housing Crisis facing the Republic of Ireland at this time demands a root and branch reform of its Strategic Planning & Development processes and time-schedules which cannot deliver the essential national housing infrastructure in a timely or satisfactory manner to meet the pressing need.
- 2.4.2 This crisis, however, also offers a unique national opportunity to simultaneously address two other major imperatives of public policy (Climate Change and the Health of the Nation) and integrate both of those imperatives seamlessly into the national housing programme, delivering enormous extra value and benefits to all new communities, now and in the future.
- 2.4.3 Building sustainable communities, rather than mere housing schemes, must be our national priority. New categories of planning must be evolved outside the compartmentalised structures and strictures used to date.



- 2.4.4 It is obvious, to everyone involved in the provision of housing in Ireland, that major innovations must be put in place in every facet of that provision to kick-start a constant annual supply of 25,000 homes. We have worked long and hard with Planning expert Michael O'Donnell to create an appropriate Planning and Development amendment which will facilitate the establishment of large sustainable communities based on renewable energy, smart technologies, and the health and well-being of the age-integrated community.
- 2.4.5 We suggest a category which should be included in the Seventh Schedule of the Planning & Development Act under the heading of social/economic infrastructure which could read as follows:

“The development of an integrated, sustainable residential development which will make appropriate provision for community, social, educational and recreational facilities, together with sustainable energy and transport systems, as part of an integrated master plan on an area of land which shall not be less than 10 hectares, and where the number of houses shall not be less than 500, which complies with the above criteria.”

- 2.4.6 This amendment would provide for a category of development that could be facilitated all over Ireland, notwithstanding their present zoning status, which would be in accordance with best planning principles, based on the best European planning models available.
- 2.4.7 The proposed amendment provides a template to provide for integrated and sustainable development, meeting energy and transport requirements and provides a fast track solution to Ireland's urgent housing crisis.
- 2.4.8 The proposed Seventh Schedule amendment is similar to the 'Fast Track' planning proposal contained in the Planning and Development and Residential Tenancies Bill 2016 where planning applications for residential development of more than 100 houses would be submitted directly to An Bord Pleanála. However, the above proposal would be a permanent mechanism to facilitate the reduction in the timeframe for delivery of major residential projects throughout the country that did not necessarily first require the zoning of lands.
- 2.4.9 We recommend the following be included in the NPF:

Proposed National Policy Objective insertion to NPF:

“In order to ensure that sufficient residential development is brought for within the appropriate timeframe it is proposed that Sustainable Housing be regarded as Strategic Infrastructure and that the Planning and Development Act be amended to allow for same, in accordance with the recommended amendment to the Act as set out earlier.”

Reason:

To ensure the timely development of sustainable new homes and communities in locations where need exists.



3 SUMMARY & CONCLUSIONS

3.1 Summary

- 3.1.1 The CSO growth targets have in the past been used to forecast future population and housing need. A review of past CSO data shows that even their high growth predictions had consistently been exceeded. Therefore, using CSO forecasts will result in a NPF that will fail to meet the needs of the state going forward.
- 3.1.2 It is therefore proposed that population targets are revised significantly upwards in the NPF, otherwise the housing crisis is set to get materially worse in the coming year. It is recommended that revised and realistic targets, based on actual historic growth rates, should be included in the NPF.
- 3.1.3 In addition, there is an urgent need to review the hierarchal process proposed in the NPF consultation document in terms of its implementation, as otherwise the time taken to give effect to the new NPF will be such that it cannot meet in a timely fashion the housing need of the GDA. This will result in significant increases in house prices or rent, which in turn will damage economic growth.
- 3.1.4 There is also an urgent need to regard housing as Strategic Infrastructure in the Planning and Development Act. This report contains a recommended amendment which would allow for integrated and sustainable development, meeting energy and transport requirements and provide a fast track solution to Ireland's urgent housing crisis.
- 3.1.5 This report should be read in conjunction with the previous Kilbride Estates Submission also.
- 3.1.6 The proposed change to the NPF now proposed will:
- Ensure that the appropriate and correct population targets are included in the NPF
 - Ensure that the proposed Methodology of Land Zoning and Prioritisation as set out in Appendix 1 and 2 of the Draft NPF are given appropriate status and become immediately effective
 - That the delivery of sustainable homes and communities in the correct location can come forwards under Planning and Development Act as Strategic Infrastructure.
- 3.1.7 Unless the changes proposed in this submission in are incorporated into the new NPF, the continuation of "business as usual" will become enshrined in the new NPF for years to come and the visions and goals as set out in the consultation document will not be delivered.
- 3.1.8 Our client would wish to continue working with the Department in further discussing and finalising the National Planning Framework, in a manner that would help meet the needs of the country going forward and promote the orderly and proper planning and development of the state over the next decade and beyond.



A APPENDIX A

A.1 Previous Submission



Description:

Submission on Draft National Planning Framework – Ireland 2040

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Kilbride Estates Ltd.



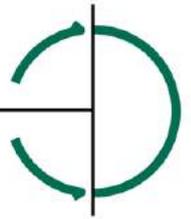
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1 INTRODUCTION

1.1 Introduction

1.1.1 In February 2017 the Department of Housing, Planning, Community and Local Government published the Issues Paper for the National Planning Framework – Ireland 2040 and invited submissions or observations on the proposed policy document.

1.1.2 Kilbride Estates Ltd. has assembled a professional multi-disciplinary team to advise them in relation to the proposed new policy document, and to make a submission on its behalf.

1.1.3 The proposal to replace the existing National Spatial Strategy (NSS) is broadly welcomed by our client. In particular, the NSS failed to deliver balanced economic and population growth throughout the state and its replacement is long overdue. Indeed the NSS (2002) was overly prescriptive and not sufficiently flexible to ensure that the planning process could respond in a timely fashion to changes in population growth, employment growth and economic circumstances, but instead was restricted to the confines of the NSS in terms of where housing and jobs were to be located. This confined many planning authorities to not even be allowed to consider otherwise worthwhile and sustainable development proposals that were not strictly in conformity with the NSS. The National Planning Framework (NPF) should learn from the NSS shortcomings and allows sustainable development in appropriate location to be brought forward in a timely fashion.

1.2 Minister's Foreword – Ireland 2040 National Planning Framework

1.2.1 The scale of the challenge for the NPF is succinctly summarised by the Minister in his Foreword, which states:

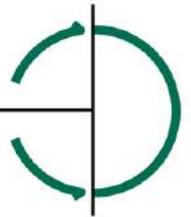
“A continuation of ‘business as usual’ will not deliver the national vision and goals we all share, such as improved living standards, a desire for people to live in safe, vibrant communities and to experience life-long health and well-being. Nor will we develop the capacity to meet our environmental obligations or be able to respond to climate change.”

1.2.2 Clearly we must abandon the “Business As Usual” concept in the new NPF if we are to deliver sustainable new communities in the correct locations that meet the housing, wellbeing and environmental challenges that we as a nation have committed ourselves to achieve.

1.3 Wider Context

1.3.1 The wider context of the NPF is worth reiterating in this context. This includes:

- Need to tackle the National Housing Emergency
- Need to meet our Paris 2015 CO2 emission targets
- Take national action on World Health Organisation (WHO) forecast of over 80% clinical obesity in Ireland by 2030
- Build sustainable new communities for all age cohorts and socio-economic groups
- Reduce time spent travelling, thereby increasing community participation
- Create increased opportunities for exercise and leisure pursuits and encourage greater community participation by local residents



1.4 Process of Delivery – Required changes to be included in NPF

1.4.1 The planned hierarchical approach as set out in the consultation document proposes a long drawn sequential approach that quite frankly will take years to set in place. Even assuming a NPF adoption later in 2017 it would take several years for the approach to be fed into Regional Strategies, County Development Plans (CDP) and Local Area Plans (LAP). The hierarchical structure proposed in the consultation document is shown in Figure 1.1.



Figure 1.1: Ireland’s Planning Hierarchy Post 2016

1.4.2 Given that some CDPs have recently been adopted or are currently under preparation this means that the NPF may not be effective on the ground for many years due to the fact that RSEs must be prepared post the adoption of NPF and the CDPs and LAPs would then have to be varied

1.4.3 Therefore, we are proposing that the NPF would also allow for a mechanism through an appropriate revision to the 7th Schedule of the Planning and Development Act to allow new sustainable developments that provides for sustainable new communities to be brought forward in the immediate future.

1.5 Proposed Amendment to NPF

1.5.1 The Housing Crisis facing the Republic of Ireland at this time demands a root and branch reform of its Strategic Planning & Development processes and time-schedules which cannot deliver the essential national housing infrastructure in a timely or satisfactory manner to meet the pressing need.



- 1.5.2 This crisis, however, also offers a unique national opportunity to simultaneously address two other major imperatives of public policy – Climate Change and the Health of the Nation- and integrate both of those imperatives seamlessly into the national housing programme, delivering enormous extra value and benefits to all new communities, now and in the future. Building sustainable communities, rather than mere housing schemes, must be our national priority, and new categories of planning must be evolved, outside the compartmentalised structures and strictures used to date.
- 1.5.3 From having a housing surplus back in 2011, Ireland now faces a national housing emergency. Our present population of 4.6 million is set to rise to 5.2million in 15 year's time, and the population of the Greater Dublin Area (GDA) will grow up 400,000 to 2.2 million, representing 42.4% of the national population. Employment in Ireland exceeded 2 million in August 2016, and a handy rule-of-thumb is that we need 1 home per 1 person employed. Nowhere is the housing challenge more apparent than in the Greater Dublin Area (GDA). Each month 2,000 new households are being formed, but housing completions in the GDA averaged only 382 per month in 2015 and 524 per month in 2016.
- 1.5.4 At the same time housing commencements in the GDA were 449 per month in 2015 and 656 in 2016. All of these figures demonstrate that despite an increase in supply and starts the gap between housing demand and supply increases every single month. Three inter-related factors add considerably to the present challenge: sufficient houses are not being built where people want to live; 20% of homes are now rented but rents are rising by 10% annually and are now higher than at the market peak; and the Central Bank insists that purchasers must have a deposit of €45,000 - €50,000 before they are granted a mortgage.
- 1.5.5 There are 140,000 (<http://www.irishtimes.com/news/environment/housing-waiting-list-rules-to-be-radically-overhauled-1.2753415>) on the social housing list nationally, with 5,000 people living in emergency accommodation, and there was an increase of 93% in homelessness in 2015, with €46 million a year being spent on hotels for homeless people. Ireland needs to build an average of 25,000 houses per annum including 5,000 social units, but the present system is failing to meet even half of that.
- 1.5.6 It is obvious to everyone involved in the provision of housing in Ireland that major innovations must be put in place in every facet of that provision to kick-start a constant annual supply of 25,000 homes. We have worked long and hard with Planning expert Michael O'Donnell to create an appropriate Planning and Development amendment which will facilitate the establishment of large sustainable communities based on renewable energy, smart technologies, and the health and well-being of the age-integrated community.
- 1.6 Proposed Amendment to the 7th Schedule: Planning & Development Act for inclusion in the NPF**
- 1.6.1 We suggest a category which might be included in the Seventh Schedule of the Planning & Development Act under the heading of social/economic infrastructure which could read as follows:
- “The development of an integrated, sustainable residential development which will make appropriate provision for community, social, educational and recreational facilities, together with sustainable energy and transport systems, as part of an integrated master plan on an area of land which shall not be less than 10 hectares, and where the number of houses shall not be less than 500, which complies with the above criteria.”**
- 1.6.2 This amendment would provide for a category of development that could be facilitated all over Ireland, notwithstanding their present zoning status, which would be in accordance with best planning principles, based on the best European planning models available.



- 1.6.3 It provides a template to provide for integrated and sustainable development, meeting energy and transport requirements and provides a fast track solution to Ireland's urgent housing crisis.
- 1.6.4 The proposed Seventh Schedule amendment is similar to the 'Fast Track' planning proposal contained in the Planning and Development and Residential Tenancies Bill 2016 where planning applications for residential development of more than 100 houses would be submitted directly to An Bord Pleanála, but the above proposal would be a permanent mechanism to facilitate the reduction in the timeframe for delivery of major residential projects throughout the country.



2 IRELAND – THE POPULATION GROWTH CHALLENGE

2.1 Introduction

2.1.1 We have undertaken a review of Central Statistics Office (CSO) population forecasts going back several years, which reveals that the CSO forecasts have consistently underestimated Ireland's population growth. This has in part resulted in the current housing crisis, particularly in the GDA as policy documents have been driven and land use zoning has been determined in the main by these CSO forecasts. As CSO forecasts are used extensively to underpin policy formulation it is worth reviewing past forecasts to demonstrate the reliability of the CSO forecasts versus actual population outcomes.

2.2 CSO Forecast for 2016 – V – 2016 Actual

2.2.1 In 2011 the CSO made forecasts for the population of the state for 2016.

- The 2016 preliminary CSO Census revealed the population circa. 4.76m for April 2016.
- The CSO forecast for 2011 to 2016 was for a population increase of 98k population in that period
- The actual population growth was a population increase of 183k, meaning the CSO underestimated population growth by almost 85k. Much of this underestimation occurred in the GDA, which in part explains the current housing crisis in the region.

2.3 Review of earlier CSO Forecasts

2.3.1 We have also looked back at earlier CSO data. In 1986 the CSO produced a range of forecast for both 2002 and 2011. Using the CSO mid range forecast, Figure 2.1 shows how that in 1986 our population forecast for 2002 were over 400,000 below actual and this figure grew to a disparity of over 1,000,000 by 2011. While forecasting is by its nature not precise this shows the danger of adopting long range CSO forecasts as the sole basis for long term planning. Also this demonstrates that margin of error in population can be extremely large particularly when done over a long timescale.

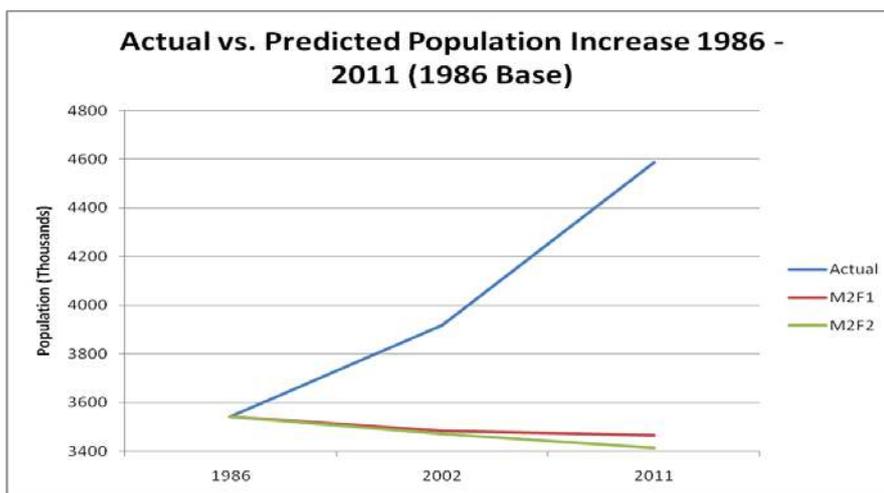


Figure 2.1: 1986 CSO Forecast vs. Actual Population as Recorded by CSO Census Data



- 2.3.2 The CSO population projections for 2002 to 2011 versus actual are shown in Figure 2.3. The figure shows both the CSO highest (M2F1) and lowest (M2F2) population forecasts versus the actual. Again the CSO data demonstrates that even their highest population forecasts were significantly exceeded by the actual population growth over this relatively short timeframe.
- 2.3.3 As land use zoning is based upon long range CSO population forecasts, which have historically and admittedly been proved to under shoot the actual growth, maybe it's time the Core Strategy model which was introduced in the 2010 Planning and Amendment Act, which is based upon the forecasted population plus 50% headroom needs to be significantly revised to enable a realistic quantum of land to be made available to provide choice and to reduce the control of those persons who control the land and know that by sitting on it they will be in a position to artificially maintain high land values and house prices.

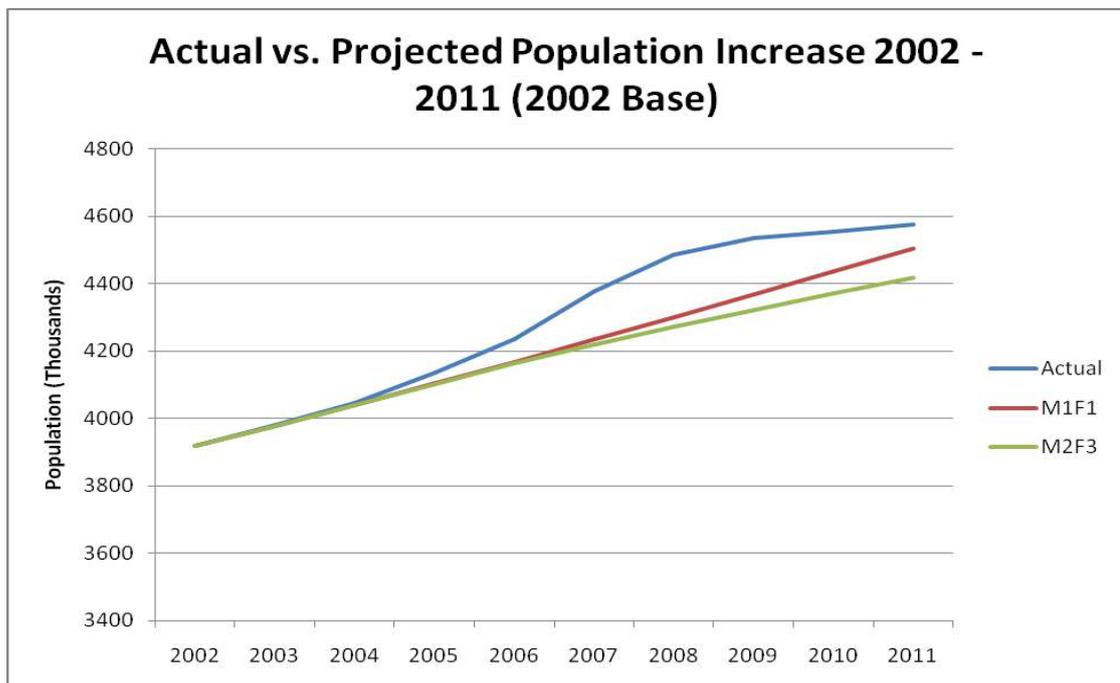


Figure 2.2: 2002 CSO Forecasts vs. Actual Population as Recorded by CSO Census Data

2.4 Most Recent CSO Forecasts

- 2.4.1 The most recent CSO forecasts produced in 2011 show a range of population projections up to 2046. This shows a wide population forecast range of between 5.1 million and 6.8 million by 2046 as illustrated in Figure 2.3. The preliminary CSO data for 2016 is also shown in Figure 2.3. This reveals that yet again the even the highest CSO forecasts for population have been exceeded, even during a period of economic stagnation and decline.

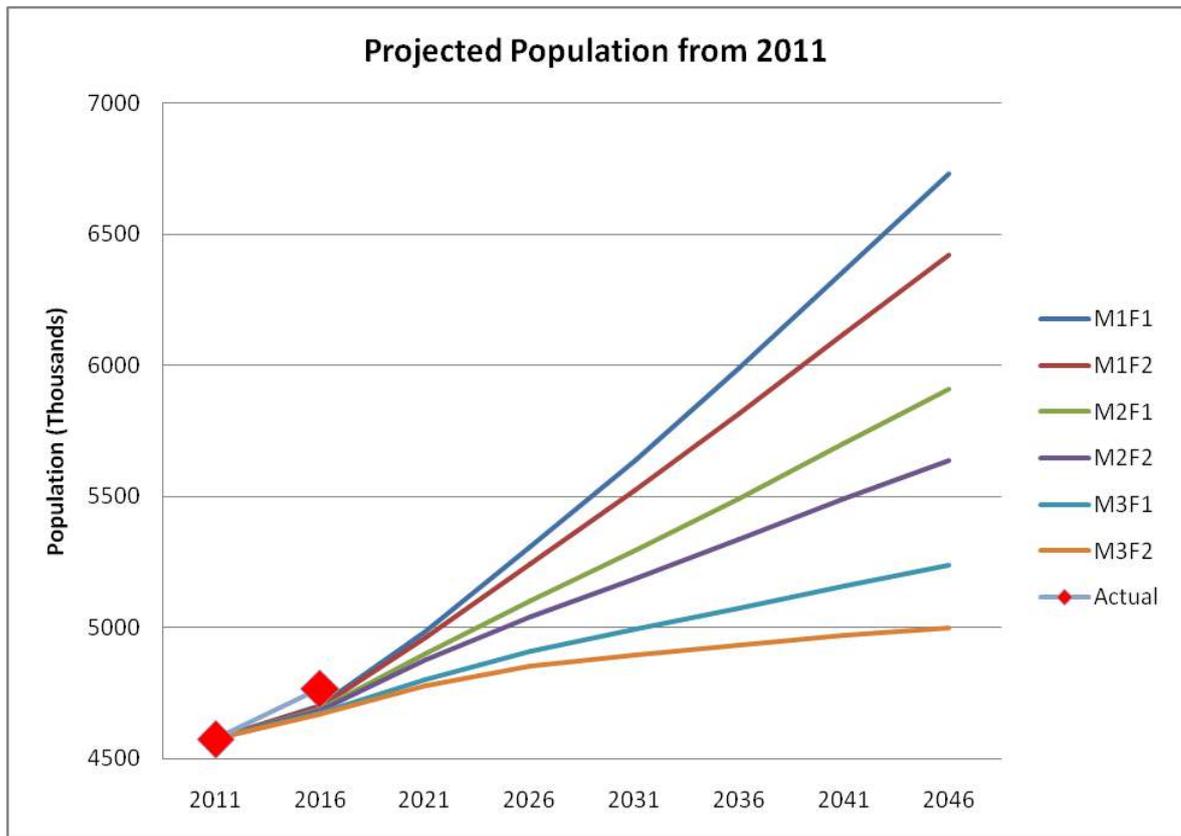
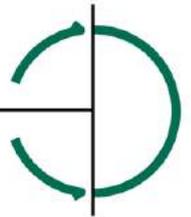


Figure 2.3: 2011 Population Projections – V – Actual Population Growth

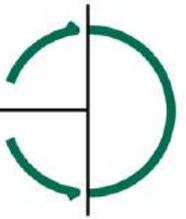
2.5 Outcome of CSO Data Review

2.5.1 The review of CSO forecasts going back several decades shows significant and consistent underestimates of population growth for the state. Given the reliance on CSO forecasts in policy formulation, including the current consultation document for the NPF, we would urge the Government to develop more realistic and more ambitious population targets that will allow the state to plan for future population growth.

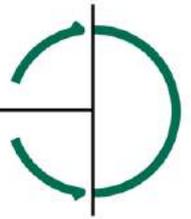
2.5.2 Indeed population growth is better measured against the employment level and hence economic growth in the state. As we are yet again reaching full employment and with medium term forecasts for high economic growth it is likely that, barring unforeseen economic mishaps, the population of the state will increase year on year by between 60,000 and 100,000 per annum. We note that this level of population was achieved in the period up to the recent economic crash.

2.5.3 Population growth had been particularly evident in Dublin and the GDA, which is set to continue and even accelerate in the future. Therefore if we are to address the current housing crisis, particularly within the GDA, far more robust population and housing needs need to be included in the NPF strategy. This includes:

- Estimated population of 5.2m by 2021 (440,000 more people).
- Need to provide new homes and communities for an additional population of 60,000 per annum and could be as high as 100,000 per annum (which was recorded in 2007).



- Need to provide for 60% of this growth within the GDA.
- Need to ensure that we do not simply provide piecemeal housing development but instead support and prioritise the need to deliver sustainable, affordable new communities in close proximity to employment growth centres and in a manner that supports wellness and meets out environmental objectives going forward.



3 REVIEW OF HOUSING NEED IN GDA

3.1 Forecast Demand

3.1.1 Based on projected economic growth and population in the GDA it is likely that over 60% of housing will need to be provided here. To meet the future population growth of the state and allowing for replacement of existing housing stock up to 40,000 new homes will be needed annually. This would mean a requirement of up to 24,000 new homes per annum in the GDA over the foreseeable future. This is in addition to the need to redress the existing housing shortfall, which is evident in the GDA at present.

3.2 Overview of Major Delivery Sites in GDA

3.2.1 Current estimates are that 23,000 units will be delivered annually over the coming years. Therefore, the housing crisis is set to continue and deepen.

3.2.2 The Government have identified major new housing delivery sites within the GDA as shown in Figure 3.1. The most recent Government announcement under Rebuilding Ireland was on 28th March 2017, where it announced funding for the provision of infrastructure on many of the sites shown in Figure 3.1 as well as sites in Ratoath, Sallins and Naas.

3.2.3 In the Dublin area, the Government has projected that up to 14,000 additional housing units will be provided up to 2021 with 37, 000 units to be delivered in the long term. Therefore, the delivery on these key sites will only contribute only one in every 8 houses need in the region to 2021 and even if the sites were delivered in their entirety in a timely fashion there would remain a chronic and growing housing shortfall in the GDA.

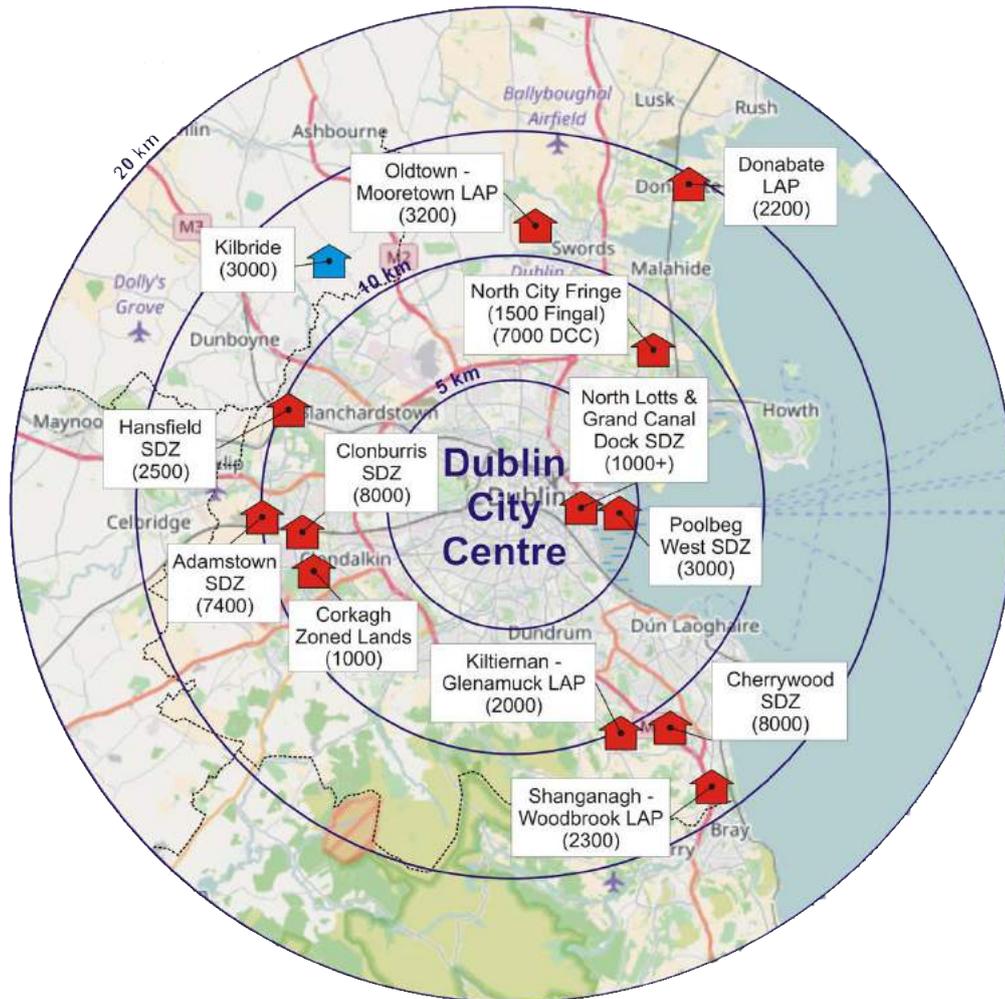


Figure 3.1: Urban Housing Delivery Sites in GDA & Proposed Kilbride Sustainable New Community

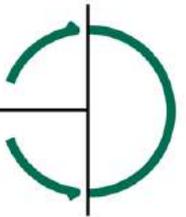
3.3 Housing and Site Costs

3.3.1 As well as just delivering housing units there is also the need to deliver affordable new homes. Many of the Urban Delivery Sites will not deliver homes or apartments at an affordable price. Indeed development lands within Dublin and the GDA are already commanding prices per plot in the region of €150,000 to €200,000 per unit. This means that many new residential units will be selling in excess of €400,000 even for starter homes.

3.3.2 This means that unless corrective action is taken through the identification locations for new homes at affordable prices within the GDA then housing will remain outside the reach of most at average or above average incomes within the GDA.

3.4 Building New Sustainable Near Zero Communities – Kilbride as an Exemplar

3.4.1 Simply providing additional housing, on its own, would not address the other key aspects of sustainable and healthy lifestyles. In addition, these new homes should be built adjacent to existing and planned employment growth centres.



- 3.4.2 The proposed development at Kilbride is one such project that could act as an exemplar as to how to deliver truly sustainable communities, at affordable prices, close to existing employment centres. Figure 3.1 shows the location of Kilbride in relation to the already identified Housing Delivery Sites. The next section will outline the key attributes of this proposed sustainable new community.
- 3.4.3 A recent submission made by Kilbride Estates Ltd. to the MCC CDP review, which contained more detailed information on the development is attached as Appendix A.

3.5 Recommended Changes to the NPF

- 3.5.1 There is first and foremost a pressing need to significantly revise upwards the housing need in the GDA over the coming decade, with a delivered target of 24,000 units/annum proposed and to include same on the NPF. Secondly, the need to deliver new sustainable communities in close proximity to existing and planned employment growth centres should be prioritised. Thirdly, there is a need to ensure that new homes should, where possible, prioritise where wellness and climate change targets can be achieved and delivered.



4 AN EXEMPLAR NEW SUSTAINABLE COMMUNITY

4.1 Introduction

4.1.1 Kilbride Estates Ltd. has prepared what it believes is an exemplar of a sustainable new community that once delivered will ensure the delivery of affordable new homes, located adjacent to major employment growth poles and meeting the higher environment standards. Such a development would act as an exemplar of how the aspiration as set out in the consultation document can be achieved in practice.

4.1.2 The CDP submission attached as Appendix A contains a detailed description of the proposed new Near Zero Energy Community (nZEC) proposed at Kilbride.

4.2 Mission Statement for Developing a New Sustainable Community

“To meet the needs of new residential communities for the 21st Century in a manner that promotes sustainable living, reduces the need to travel and provides an exemplar of how we can meet our emission targets.”

4.3 Planning and Transport Priorities

4.3.1 The following are some of the key elements of the proposed new community

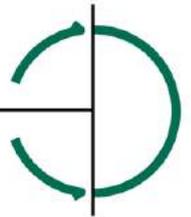
- Provision of affordable homes adjacent to existing and future employment growth poles
- A new nZEC community with its own energy centre
- A new community that reduces travel 1st Priority
- Reduce distance/time travelled = Greater community participation
- Provide high quality internal linkages for walking and cycling
- Promote Shared Living Concept with near Zero Emissions

4.3.2 We bench-marked the concepts from best and worst practice from Ireland, UK and Netherlands and combined these with new and emerging technology.

4.3.3 A new community where all services are locally provided and accessible, on foot or by bike and where people live in healthy and sustainable homes in a quality landscaped setting.

4.4 Key Components for Sustainable New Communities

- A defined population (8,000) and land area (400 acres)
- Adjacent to major planned employment (27,000)
- Mixed affordable housing types for singletons, families, elderly etc.
- Integrated with leisure, sport and community facilities
- Zero carbon travel
- nZEB Housing and Community Buildings
- Quality landscape and streetscapes
- A community based around a central core



4.4.1 The overall concept plan for the nZEC community is illustrated in Figure 4.1 and show how all the key elements of a sustainable community can be accommodated within a defined land area and set in a quality landscape setting.

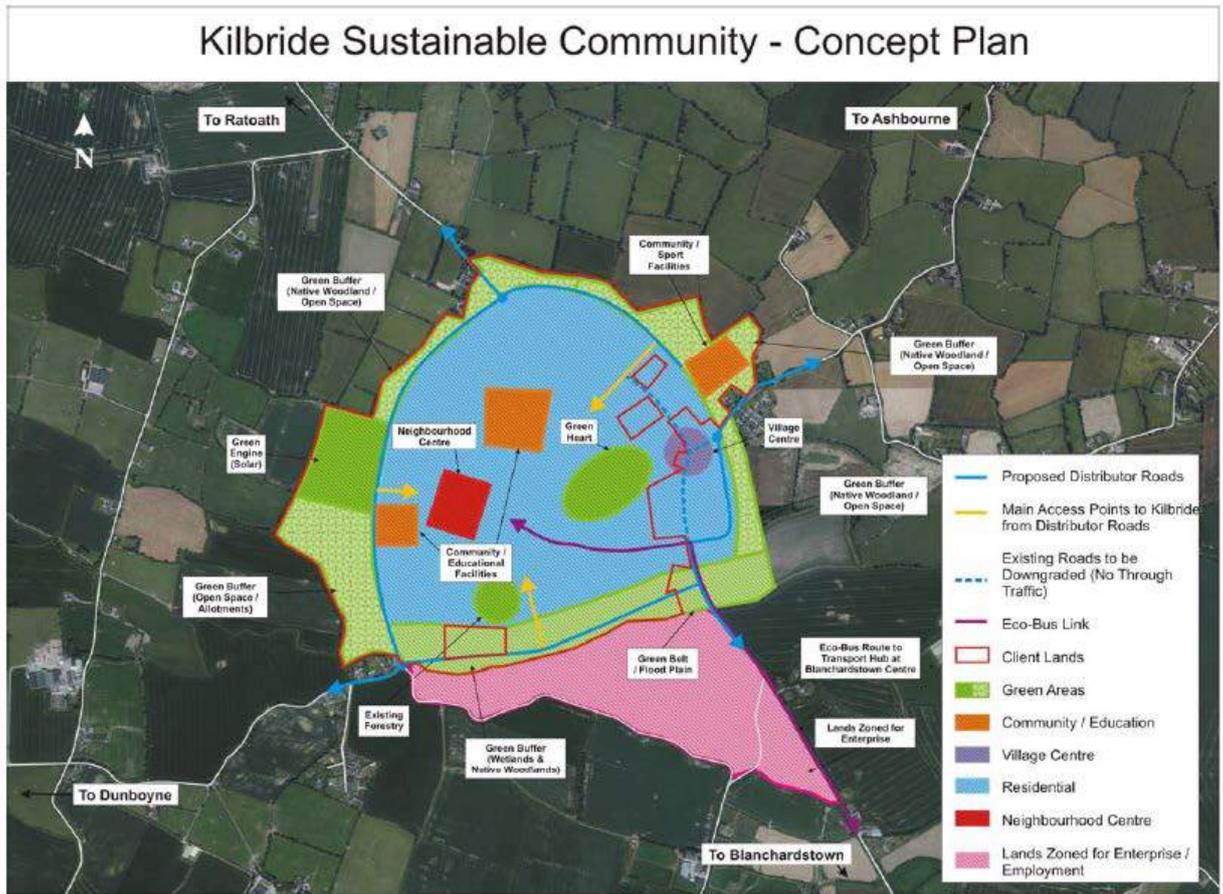


Figure 4.1: Kilbride Near Zero Energy Community Concept Plan

4.4.2 The detailed masterplan shows the proposed layout of this new community, to be established adjacent to the existing village of Kilbride is shown as Figure 4.2

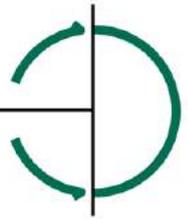


Figure 4.2: Kilbride Near Zero Energy Community (nZEC) Master Plan

4.5 The Benefits of Ecology in an Urban Context

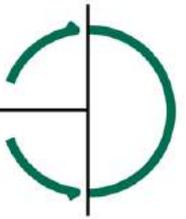
- Greenery can increase house price by 20%
- Improve well-being
- Contributes to urban beauty and attractiveness of a “place”
- Raises property value
- Ballsbridge has 1 tree for every 8 residents
- Dublin 1 has 1 tree for every 130 residents
- Kilbride proposes to have 1 tree per resident, in addition to wetlands, meadows and allotments

4.6 Kilbride - Key Deliverables

- The overarching priority is to facilitate the building of new affordable, sustainable and healthy communities
- Deliver cost efficient nZEB homes adjacent to major employment growth centre
- Deliver a sustainable new community in a planned fashion.
- EVs and Eco-Bus Services to provide zero emission travel
- An energy centre to power the community
- A healthy and integrated community within a quality landscape

4.7 Electric Cars and Buses – Attributes

- Zero Emissions
- Silent
- Lifespan approx. 12 years
- Accelerates and brakes more efficiently than heavier conventional buses
- Eco-Bus more cost efficient the other form of PT – Self funding
- E-cars powered from zero carbon energy sources

**4.8 Delivering New Sustainable Communities - Obstacles to Delivery**

- No readily available planning process to allow the early delivery of truly sustainable new communities
- No access to market process yet established to enable solar power to be delivered.

4.9 Proposed Changes to the NPF

- 4.9.1 The above demonstrates that nZEC communities can be developed at an affordable cost and in the right location. However, to allow the Kilbride and similar concepts to progress, the NPF must address the planning process which currently prevents such developments to progress in the immediate future. Secondly, it must allow access to the market for solar energy projects to be built in tandem with nZEC communities.



5 SUMMARY & CONCLUSIONS

5.1 Summary

- 5.1.1 The Department of Housing, Planning, Community and Local Government has commenced the preparation of the new National Planning Framework to replace the existing National Spatial Strategy. The Department has published an Issues Paper document inviting consultation from interested parties.
- 5.1.2 The CSO growth targets have in the past been used to forecast future population and housing need. A review of past CSO data shows that even their high growth predictions had consistently been exceeded. Therefore, using CSO forecasts will result in a NPF that will fail to meet the needs of the state going forward.
- 5.1.3 It is therefore proposed that unless housing targets are revised significantly upwards in the NPF then the housing crisis is set to get materially worse in the coming year. It is recommended that revised and realistic targets, based on actual historic growth rates, should be included in the NPF. It is estimated that unless 24,000 homes are delivered annually within the GDA, the current housing crisis is set to increase. Steps taken to date simply do not go far enough to deliver real change.
- 5.1.4 In addition, there is an urgent need to review the hierarchical process proposed in the NPF consultation document in terms of its implementation, as otherwise the time taken to give effect to the new NPF will be such that it cannot meet in a timely fashion the housing need of the GDA. This will result in significant increases in house prices or rent, which in turn will damage economic growth.
- 5.1.5 Kilbride Estates Ltd. appointed a multi-disciplinary team to develop a sustainable and affordable community concept that would deliver quality homes with wellness, sustainability and affordability at its core. The Planned Sustainable New Community, adjacent to the existing settlement at Kilbride, can succeed in delivering an exemplar of sustainable and affordable living immediately adjacent to major employment growth centres on the Dublin/Meath border.
- 5.1.6 The report recommends in Chapter 1 proposed and immediate changes to the Schedule 7 of the Planning and Development Act, which would allow for new sustainable communities to come forward in the immediate future, by way of a direct planning application to the Board.
- 5.1.7 The proposed Kilbride Sustainable Community would act as an exemplar delivering affordable, sustainable communities in a manner that promotes wellbeing and at near zero energy. This development would act as a demonstration project that could be replicated throughout the region and country. Further details of the proposed development at Kilbride are contained in Appendix A attached.
- 5.1.8 The NPF timelines and the subsequent changes required at regional, county and local level will mean that sustainable new communities such as that proposed at Kilbride can come forward in a timely fashion. If the NPF is to meet its goals it must be amended to allow for such worthwhile and necessary projects to come forward in the immediate future. Similarly, the changes to the electricity market are required to be addressed immediately to ensure that new communities can include renewable and zero carbon energy sources in tandem with nZEC.
- 5.1.9 Unless the changes proposed in are incorporated into the new NPF, the continuation of “business as usual” will become enshrined in the new NPF for years to come and the visions and goals as set out in the consultation document will not be delivered.



- 5.1.10 Our client would wish to continue working with the Department in further discussing and finalising the National Planning Framework, in a manner that would help meet the needs of the GDA and promote the orderly and proper planning and development of the state over the next decade and beyond.