



National Planning Framework
Co-operative Housing Ireland Submission

March 2017

Executive summary

Co-operative Housing Ireland is pleased to have the opportunity to make a submission to the Department of Housing, Planning, Community and Local Government (DHPCLG) on the development of a National Planning Framework. In this submission we propose:

- A vision for Ireland in which everyone has access to adequate housing and is able to participate in the social, economic, and environmental development of the wider community (pg. 2)
- A coherent spatial policy that promotes both urban and rural environments, tackling vacancy rates in the building stock and addressing homelessness (pg. 2)
- A positive attitude to development demand and a more critical engagement with some aspects of agricultural land use (pg. 3)
- Embracing the potential of Dublin to provide more housing, jobs, and services for the benefit of the whole nation (pg. 4)
- A place-based approach to enhancing the intrinsic qualities of regional cities and promoting them as places to invest (pg. 4)
- A transformation in attitudes to inner urban areas as places to live, work, and spend leisure time (pg. 4)
- A focus on raising the standards of urban housing to make cities more attractive places for families to call home (pg. 5)
- A programme of research and development to raise standards of design for the built environment (pg. 5)
- Engaging with older people and smaller households to understand and respond to their housing aspirations (pg. 5)
- Supporting communities in rural towns to take a more active role in promoting local development (pg. 5)
- A national landscape strategy to protect and preserve the natural environment and to promote a richer range of activity in the countryside (pg. 6)
- New planning processes at the local and regional levels to promote community participation and co-operation (pg. 6)
- A long-term national housing strategy as part of the National Planning Framework that guides short-term investment choices (pg. 6)
- A review of the Part V approach to housing provision (pg. 7)
- A restructuring of provisions around Protected Structures to promote greater use of historic properties while conserving the built heritage (pg. 7)
- An investment approach at the local and national levels that aligns spending to planning objectives (pg. 7)
- Opportunities should be provided to communities to engage in finding productive uses for vacant and derelict sites and buildings (pg. 8)
- Robust governance and oversight mechanisms that engage communities in securing the delivery of the Framework's objectives. (pg. 8)

Introduction

Planning is a future-focused and creative process that seeks to articulate a vision for places and provide a framework for its delivery. The National Planning Framework should articulate a positive and ambitious vision for the Ireland of 2040 while providing a clear pathway for the delivery of that vision.

The vision of Co-operative Housing Ireland is for everyone to have access to adequate housing and to be able to participate in the social, economic, and environmental development of the wider community. This calls for significant changes to be made, not just to the use and development of the built environment, but also to the structures that govern how decisions are made in these areas.

Ireland is rare in the world in having a lower population in the present day than it did at the start of the nineteenth century. There is no doubt that Ireland's political stability, moderate climate, and relative economic advantage mean that the country can and should support a larger population than it has at present.

And yet, Ireland has failed to deliver a coherent spatial policy that capitalises on opportunities for growth and enhances the intrinsic richness of the natural environment. The line between rural and urban has blurred, undermining both environments. Vacant housing proliferates throughout the country, at nearly 10 percent of the housing stock, while at the same time homelessness has reached crisis proportions. The National Planning Framework must take radical steps to address these systemic failures and their consequences.

About us

Co-operative Housing Ireland is the national federation for the co-operative housing movement. Since our foundation in 1973, we have supported the delivery of more than 5,500 homes for Irish families.

Our work with local self-help groups has delivered 3,500 homes across Ireland and we continue to support local communities to use the co-operative model to meet their own housing need. As an Approved Housing Body (AHB) in our own right, we also manage 2,000 homes through a network of democratically controlled local co-operatives.

Co-operatives are a global self-help movement united in a shared set of values and principles. Around the world, housing co-operatives provide access to quality, affordable accommodation to more than 100 million households in every form of tenure.

Over the years since 2011, Co-operative Housing Ireland has expanded its housing stock by 50% in response to pressing housing need. Innovative forms of delivery in response to the withdrawal of 100% capital funding have included:

- Leasing and managing unsold affordable housing for local authorities,
- Acquiring and completing unfinished housing developments – including developments that contain a private rental element,
- Working with NAMA and its SPV, NARPS, to provide new social housing,
- Progressing direct construction of new social housing.

The Society has plans in place to deliver a further 1,500 units over the years to 2020. These will include construction of mixed-tenure schemes as well as housing acquisitions that will assist in moving households out of subsidy schemes such as the Rental Accommodation Scheme and rent supplement.

The organisation is pleased to have the opportunity to make a submission to the Department of Housing, Planning, Community and Local Government (DHPCLG) on the development of a National Planning Framework.

Land use in Ireland

Much of the context setting of the Issues and Choices paper refers to the phenomenon of urban sprawl and a perception that the natural environment is threatened by further development. This is the wrong perspective for a spatial planning document to adopt. On the contrary, development demand should be embraced as an opportunity to positively shape the kind of environment that we want for the future.

The perceived development of the built environment as being spatially dominant sprawl is, in part, a psychological phenomenon that is a product of the fact that urban areas are more full of incident, and therefore more memorable, and that they take longer to travel through than less populated rural areas. In fact, urban areas in Ireland are relatively limited in scale. The largest urban build-up is concentrated in Dublin, the third smallest county in the country, and large areas of that county are covered by farms, parkland, and mountains.

Dublin has a population density of 1,380 people per square kilometre, 18 times the average for Irish counties, and not significantly lower than London at 1,510. The widespread perception of unmanageable sprawl emanating from low density development in the greater Dublin area is not supported by the facts.

In fact, far and away the dominant form of land use in Ireland is the production of grass as a crop to support livestock. The current population of sheep and cattle in Ireland is in excess of 12 million and rapidly heading towards three times the human population. By contrast, the amount of land used to grow crops for human consumption continues to fall. 281,000 hectares of land are used for the production of cereals, for example, representing less than 4 per cent of land area.

This 'bovine sprawl' has important consequences for Ireland's ability to meet its climate change targets, for our food and energy security, and for the quality of our drinking water. The recent challenges posed by the fall of sterling after the Brexit vote show how vulnerable our highly specialised agricultural sector is to external shock. Diversifying the use of rural land to promote a more sustainable mix of uses must be a key priority of the National Planning Framework. There is no reference to these challenges in the Issues and Choices paper.

Policy choices such as those that will be made through the National Planning Framework have important 'real world' consequences. These include the quality of life enjoyed by commuters, Ireland's competitiveness in a global marketplace, and the quality of our natural environment. It is important that our National Planning Framework engages with these issues in a positive way. We need to embrace development opportunities and value the urban experience without uncritically accepting that every agricultural use of land is either neutral or positive in terms of its impacts.

The role of Dublin

Considerable attention is paid to the role of Dublin within the Issues and Choices paper including comparisons to major cities in other similarly sized countries. The paper makes clear that Dublin, which provides 48% of the nation's GDP, is a major driver of national prosperity. And yet much of the commentary of the paper focuses on relieving development pressures on the Dublin region and promoting alternative centres of growth.

The Issues and Choices paper is permeated by an unhelpful dichotomy between Dublin and the rest of the country. In fact, a stronger Dublin benefits the whole of the nation through greater inward investment, more efficient service provision, and a richer variety of service types. Communities from outside Dublin can and do travel to the city to take advantage of the services that it offers and the national transport system is geared to facilitate this relationship.

With a population of 1.69 million in the greater Dublin area, Dublin is a small city by international standards. Indeed, while there has been significant population growth in the wider metropolitan area, many parts of the urban core have experienced population decline in the years 1991 – 2016. There is real potential to increase the size of the city's population and with it the density of housing, jobs, and services.

Regional development

The lesson of the National Spatial Strategy is that merely identifying an area for growth does not necessarily cause that growth to occur. A call for 'balanced regional development' will do nothing, in itself, to counteract the apparent pull of Dublin for investment. For this reason, it is to be welcomed that the Issues and Choices paper calls for 'Effective Regional Development' instead.

Effective regional development will value and enhance the intrinsic qualities of places. There is no doubt that there are great strengths in Ireland's regions, particularly larger regional settlements. This includes the creative and cultural opportunities in Galway, education in Cork, strong transport connections in Limerick/Shannon etc. Effective regional development will be realised by recognising and promoting these strengths. It sells short the qualities of these places to value their development potential as simply being "not Dublin".

If we want regional cities to grow, then we need to invest in enhancing and promoting their intrinsic strengths as attractive places to live and invest. This calls for a step-change in the approach to urban place-making in regional cities. In Limerick, for example, there is a need to celebrate the rich legacy of Georgian town planning by repopulating the city centre and reversing the trend to exurban retail development.

An urban revival

It is striking that, in the context of a rapidly urbanising world, Limerick, Galway, Cork, and Waterford have all experienced declines in their inner urban populations over the period 1991 – 2016. At the same time, peri-urban growth and a proliferation of one-off housing provision have blurred the boundaries between urban and rural, undermining service provision and compromising the quality of the built environment.

The National Planning Framework must take strong steps to reverse this trend to de-urbanisation. The temptation exists to address this issue by imposing stricter controls on the provision of one-off housing or by seeking to limit the outward growth of suburban areas. Experience has shown that this is an approach that has met with limited success.

Instead, what is required is a positive approach that engages with urban areas in order to promote their attractiveness as places to live, work, and spend leisure time. This requires a reversal of the relative under-investment in inner urban areas, particularly around the facilities that make them attractive places for families – high quality early years education and schools, green spaces and places to play, and a safe and comfortable urban environment.

The quality of housing provision in urban areas is of the paramount importance in reversing the suburbanising trend. The nationally imposed reduction in space standards for apartment developments in urban areas was particularly unhelpful in this regard. The decline of inner urban areas will not be reversed if families continue to be forced to trade between commuting times and space within the home. The National Planning Framework should focus on raising the standard of urban typology housing provision in terms of the quality of the dwelling and also the management of shared spaces and the provision of services.

The built environment

The quality of the physical environment has important consequences for health and well-being. This includes whether access to jobs, retail, and leisure opportunities are available within walking or cycling distance of people's homes, but also the wider quality of the built environment. A higher quality housing stock in terms of energy performance is known to support better respiratory health and access to high quality green space supports good mental health.

However, the structure of the built environment has wider implications in terms of social connections and access to economic opportunity. Appropriately planned urban development avoids over-concentration of a dominant use that can lead to the stigmatisation of an area. More intense and varied land use in our urban areas, as called for above, will lead to the production of richer and more vibrant neighbourhoods.

If the National Planning Framework succeeds in adopting a pro-urban approach that favours density of development, then design quality will increase in significance. Design professionals, including planners and landscape architects, should be recognised by legislation and included in every local authority area. The Framework should also include provision for research and development geared towards improving the quality of the built environment. A national strategy for promoting green networks including access to nature and open space for urban areas should flow from the Framework.

Housing mix and type

Successive demographic analyses have shown that Ireland has a population that is living longer and in generally smaller household sizes. From this it is typically concluded that there is a need to move towards smaller housing units. The experience of the last twenty years has shown, as evidenced by continuing peri-urban growth, that when the option for larger floor areas is available, those with resources will choose them over smaller units, regardless of household size.

The National Planning Framework should put in place a programme of research and consultation on housing aspirations. This is particularly vital to address the challenges facing the ageing population. Many older people find themselves living in homes (and with gardens) that are too large for their needs or isolated from the services they want to access. Engaging with this group in order to design housing that meets their needs and positively supports a choice to change accommodation will address pressing challenges around service provision, loneliness, and the need for a greater supply of family accommodation.

Rural purpose

The National Planning Framework offers an opportunity to halt the suburbanisation of the Irish countryside and to provide a clearer role and purpose for rural towns. Resources should be put in place to work with local communities in rural towns to identify the role and character of their settlements and to build on their strengths. There should be a strong

predisposition to support new housing developments within walking distance of existing town centres to support local service provision and combat rural sprawl.

The Framework should be used as a launching point for a national landscape strategy that protects and promotes areas of high ecological or scenic amenity and that articulates a clear vision for the Irish countryside. The opportunity should be taken to introduce a richer mix of uses into the rural landscape, beyond livestock farming, to include an enhanced programme of afforestation.

Legislative framework

The development of the National Planning Framework should be embraced as an opportunity to undertake a comprehensive review of the Planning and Development Acts to ensure that the right legislative framework is in place to support the delivery of spatial ambitions.

At the local level, communities should be encouraged to positively engage with the development potential for their areas. In England, the introduction of Neighbourhood Planning has allowed local communities to actively seek out and shape development opportunities. Neighbourhood Plans are subject to local referendum and offer an unrivalled opportunity to engage communities in decisions about their own environment.

Within Ireland, there is real potential to employ this method to allow communities to play a proactive role in seeking the development that they want, rather than responding to development that they oppose. For rural towns, in particular, a bottom-up approach to forward planning may help to deliver investment confidence and tackle an ongoing process of decline.

At the Local Authority level, there is considerable scope to improve the current development planning process. At present, the process is heavily reliant on an iterative process of restrictive land use zoning that results in little scope for change over time and that concentrates local opposition on specific zoning proposals. Local Authorities should be empowered to explore new methods of plan-making that engage communities in developing a vision for an area, rather than focusing on opposing specific use proposals.

The lesson of the National Spatial Strategy is that there is a need for a coherent approach in delivering a national vision at local and regional level. Placing the National Planning Framework on a statutory footing is a welcome first step. Greater effort should be invested in securing national outcomes at a regional level by encouraging co-operation across Local Authority boundaries, particularly in areas of development demand such as the Dublin authorities, Waterford/Kilkenny, Galway City and County, etc. This may include the creation of position of elected mayor for appropriate regional geographies.

Housing strategy

The provision of housing is one of the most significant land uses within built up areas. It is vital that the supply and demand for housing are considered as a central element to development planning process, particularly in order to ensure the timely delivery of supporting infrastructure and services. The continued emphasis on housing strategies, and the requirement to consult with housing providers, in the Urban Regeneration and Housing Act was a welcome development.

The National Planning Framework should support at a national level the housing planning that takes place locally. In particular, there is a need for a coherent, long-term vision for the future of housing supply. Housing policies produced by DHPCLG have tended to be short

term in nature (the Housing Policy Statement of 2011 was succeeded by the Social Housing Strategy in 2014, which has been followed by Rebuilding Ireland in 2016). There is a need for an over-arching strategy to guide short-term delivery proposals, particularly if we are to overcome the housing market cycle of boom and bust.

Part V

Part V of the Planning and Development Act played an important role in the delivery of new social and affordable housing at the start of the century. The retention of Part V in the Urban Regeneration and Housing Act was welcome, as was the greater clarity on the need for on-site provision of housing supply.

The National Planning Framework should set out a process for a comprehensive review of Part V to assess its role and potential. The National Economic and Social Council (2000, pg. 11)¹ have questioned Part V as a policy approach and could be tasked with carrying out a review of the system. A review of the system could include an examination of ways to capture, for the benefit of the community, the uplift in site value as a result of planning permission. The exclusion of all affordable housing schemes might also be revisited as might options for innovative forms of partnership working and shared delivery.

Conservation and built heritage

The current primary mechanism for promoting the conservation of built heritage is the inclusion of buildings on the Record of Protected Structures. This mechanism applies the same standard of protection to every structure that is included from major architectural treasures such as the former parliament house on Dublin's College Green to relatively modest terraced houses.

The consequence of this one-size-fits-all approach is that very high standards of protection can be afforded to unremarkable buildings, disincentivising their renewal. In urban areas, this has compounded difficulties associated with reusing older buildings and makes it even more challenging to sustain vibrant town centres.

The consequences of Protected Structure status for property owners means that some Local Authorities have adopted a highly conservative approach to the inclusion of new structures on the Record, for fear of opposition. Thus, while some older buildings, which could readily be put to constructive use, lie idle, others lack any protection for their important heritage features.

We recommend revisiting the approach to Protected Structures and considering the reintroduction of a system of grading with the highest level of protection afforded to the most significant buildings and a lower level of protection afforded to buildings that are of most significance for streetscape value. This would support the inclusion of a greater number of buildings within the protected grades while at the same time providing clarity to property owners around the options for returning buildings to productive use.

Delivery and resources

A successful National Planning Framework will provide the clarity and confidence to support both public and private sector investment in the delivery of the vision. It is critical that the Framework provides the basis for all major national capital investment and that decisions which would undermine the vision are rejected.

¹ NESCC (2014) *Social Housing at the Crossroads*, Dublin

At a national level a process should be put in place to ensure that major programmes of public investment, particularly in infrastructure are sense checked against the Framework. This includes making sure not only that investments are aligned to areas identified for growth, but also ensuring that wider strategic goals of the Framework are supported by investment decisions. If the Framework calls for a greater emphasis on travel by foot, bicycle, and public transport, for example, capital spending must support this policy objective.

At the local level, support for development growth is dependent on the timely delivery of supporting infrastructure and services. There is a need for a new local investment framework, guided by local development plans, that ties local and national statutory agencies into service delivery. The Local Economic and Community Plan process provides the basis for such an approach.

It is vital for the delivery of spatial objectives that Local Authorities take a more active approach to land management. This should include sites under their own control as well as other sites in public ownership. The Framework should provide a clear pathway for dealing with vacant and derelict sites and buildings and opportunities for communities to take control of these sites should play a central role.

Governance and oversight

A critical weakness in the National Spatial Strategy was the ease with which investment decisions could be made that undermined the Strategy's objectives. As well as having a statutory basis, there is a need for a robust oversight mechanism that ensures that the objectives of the National Planning Framework are delivered on a whole of government basis. This mechanism should be led by the Minister at DHPCLG but should include an oversight body that includes appropriate representation from local and regional government and from civil society.

Conclusion

Co-operative Housing Ireland is pleased to have the opportunity to present these initial observations on the Issues and Choices paper. We look forward to engaging with the future development and delivery of the National Planning Framework and would welcome the opportunity to meet to discuss these issues further.

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