



# Public Consultation Housing Agency submission

November 2017

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# Introduction

The Housing Agency is a statutory body established under the aegis of the Department of Housing, Planning and Local Government. The Agency provides Local Authorities and Approved Housing Bodies (AHBs) with advice and support on the delivery of housing and housing services.

The Housing Agency provides a broad range of services including:

- **Housing Supply and Mortgage Support Services**
- **Housing Regulation**
- **Research Services**
- **Procurement and Projects**
- **Shared and Centralised Services**

The Housing Agency welcomes the National Planning Framework (NPF) and believes that the NPF can provide a vision and framework for the implementation of sustainable planning policy in the coming years and that it has a positive role to play in how we address our current housing crisis.

This submission by the Housing Agency sets out the Agency's suggestions on the draft National Planning Framework (NPF) from a housing and housing related perspective. It follows on from the original submission on relevant planning issues for the NPF made by the Housing Agency in March 2017.

The submission is in four parts:

1. **General recommendations including recommendations relating to some of the key points made in the Introduction to the NPF, Ireland 2040 - Overview and Key Messages;**  
and
2. **Housing related recommendations.**
3. **Summary of recommendations.**
4. **Further contact/information.**



# 01 General recommendations

## 1.1 Structure, status and content of NPF

The following general recommendations relate to the structure, status and content of the NPF:

1. Introduction – **more detail** to be provided in the introduction **on the status of the NPF, and on how it will influence decisions made at regional and local level**. Describe how the NPF can act as an effective framework for future planning and as a mechanism to safeguard state interests at regional and local planning level.
2. Vision – NPF to note that the aim is to ensure that, by 2040, we achieve a quality of place, supported by items such as infrastructure, services, and housing, that is comparable to what exists in the very best cities, towns villages and rural areas in Europe. Ongoing use of comparable indicators on items such as of quality of urban environment, housing stock, public transport, access to retail etc. to be used to measure achievement.
3. NPF to state that economic, social and environmental sustainability must be at the heart of all decision making and **place a presumption in favour of sustainable development**<sup>1</sup> at the heart of all decision making.
4. NPF to stress the importance of **making best using of the existing building stock**. (refer to 1.2.4 below).
5. **NPF to include a set of planning (land use) principles**<sup>2</sup> – to include items such as:
  - Necessity of having plan led development with associated local and neighbourhood plans;
  - Support for transition to a low carbon future;
  - Support for good design;
  - Real support for sustainable transport etc.
6. **NPF to clarify status of its Policy Objectives** and describe how these Policy Objectives will be monitored and implemented. **Wording of Policy Objectives to be reviewed** to ensure that they are comprehensive and that they are written in way that allows progress, implementation and time-lines to be put against them. Summary/appendix to include a list of the 70 policy objectives included in the NPF.
7. NPF to include **commitment to investment in research** on items, such as densifying our cities service/infrastructure and on the use of brownfield sites.
8. NPF to **expand on role of planning in helping to create a fairer society**, through the development of more socially inclusive communities –commitment to creating socially inclusive environments and early planning participation and community consultation to be stated in the NPF.

1. Refer to National Planning Policies Framework, Communities and Local Government, March 2012 page 4.

2. For a list of planning principles refer to National Planning Policies Framework, Communities and Local Government, March 2012 pages 5-6.

9. NPF to state that **Property Registry Data will be made readily available** – to strategically plan, for new homes, we need data on who owns what and where.
10. NPF to commit to the principle of **active plan led land management** with an emphasis on spatial planning and with requirement that **local area plans, masterplans and neighbourhood plans be prepared for all sites over a minimum size**.
11. NPF to state that the suggested Land Development Agency, or a similar organisation, will act as an **overarching body to co-ordinate transport, services and development nationally** and to co-ordinate and support plan led development at national level.
12. NPF to act as a **champion for good design**. NPF to commit to the introduction of mechanisms to foster and assess quality and to ensure that procurement supports design quality. NPF to include suggestions on how the value of good planning (and design) can be communicated to the public.
13. NPF to commit to a **regular reviews of existing policies, structures and resources** to ensure that they align with and support the aims of the NPF.
14. NPF to reference and support the Key Commitments contained in the **UN New Urban Agenda – Habitat III**, which sets a global standard for sustainability in cities.

## 1.2 Putting in Place a New National Regional Development Strategy

### 1.2.1 Growth targets

The Housing Agency supports the aim of balancing regional growth and of renewing built up areas and of building up the fabric of smaller towns, villages and rural areas. However, for regional balance to be achieved, **planning policy must strongly support the densification of our towns and villages and actively discourage urban sprawl and one-off housing**.

The specific growth targets (50% in 5 cities and 50% elsewhere) may need to be reviewed in the light of national economic growth trends and migration patterns and other relevant data as they arise over the lifetime of the plan. The NPF policy on growth needs to be adaptable and flexible enough to respond in a timely way to demographic changes and house hold sizes<sup>3</sup>. The requirement for on-going review and analysis of growth targets is stated in the NPF. **Review of the broader planning and economic policies that influence growth patterns** should feed into that review and analysis.

Population density is required to create the critical mass required to support infrastructure and employment. For the regions to prosper there needs to be a commitment at national and local level, supported by planning policy, to **building up the critical mass required to support service provision and employment**. The regional balance identified in the NPF will not be achieved if the existing dispersed patterns of growth and proliferation of low density developments and one-off housing continues.

### 1.2.2 Growth in built up areas

40% of housing delivery is noted in the NPF as the national policy for growth in built up areas. NPF to state that the aim is to actively seek to maximise growth in built up areas, including sub-urban areas, with the **40% target identified as minimum** and with target, plan based, densities established for all sites in built up areas.

3. The report, Census Summary Results Part 1, showed that the total population change over the five years since April 2011 was 173,613, an increase of 3.8 per cent. Of the 173,613 increase, 138,899 was in urban areas, or 80 per cent. The largest increase in rural population was in Cork County with an increase of 6,946, followed by Kildare, which saw its rural population increase by 4,025. There was a decline in the rural population in Sligo of 1,621, off-set by an urban increase of 1,763, which can be largely attributed to the re-classification of Collooney from rural to urban. CSO 2016.

The Housing Agency welcomes the statement on page 17 that *there is no justification for the creation of entirely new settlements in Ireland.*

### 1.2.3 Growth of Ireland's range of large and smaller towns, villages and rural areas.

The NPF target for 50% of our growth to take place in Ireland's range of large and smaller towns, villages and rural areas – the NPF notes that: *most of this growth will be targeted at building up the fabric of our smaller towns, villages and rural areas with much of that happening by redeveloping derelict and under-utilised lands inside small towns and villages.*

Many of these smaller towns and villages have experienced a significant decline in their population in recent years with growth outside our major centres primarily taking place through the proliferation of one-off housing in rural areas.

One off housing in rural areas is neither economically, socially or environmentally sustainable but remains, for many, a preferred option to living in built up areas. **Planning Policy to be strongly proactive in introducing measures to put a stop to the proliferation of one-off houses in rural areas and to ensuring that almost all new development outside our major towns takes place in smaller towns and villages.** The NPF should take the lead in this regard.

The NPF commitment to a National Monitoring and Implementation Plan –with associated actions and timelines to support these measure is welcomed. NPF to **also indicate the broad range of measures required (including governance structures, planning policies that support development of brown field sites, public education programmes, incentives, pilot studies, urban task force, support etc.) to support the presumption in favour of development in built-up areas.**

### 1.2.4 Existing building stock

We need to know more about the buildings in our existing urban areas, towns and villages. Approximately 80% of the housing stock that will be available in 2040 already exists. We need to ensure that best use is made of this stock.

NPF to therefore commit to establishing **a national programme for recording and analysing our existing building stock** and, as more data on the existing building stock becomes available, separate targets for re-use of existing buildings in built up areas, for addressing underuse of existing buildings and for reducing the rate of obsolescence should be identified and fed into planning policy and into growth targets.

## 1.3 Legislation and Independent Office for Planning Regulation

The Housing Agency supports the creation of a new independent Office of the Planning Regulator, which will also be responsible for monitoring implementation of 2040. **NPF to include more detail on the powers, remit and resourcing of the planning regulator.**

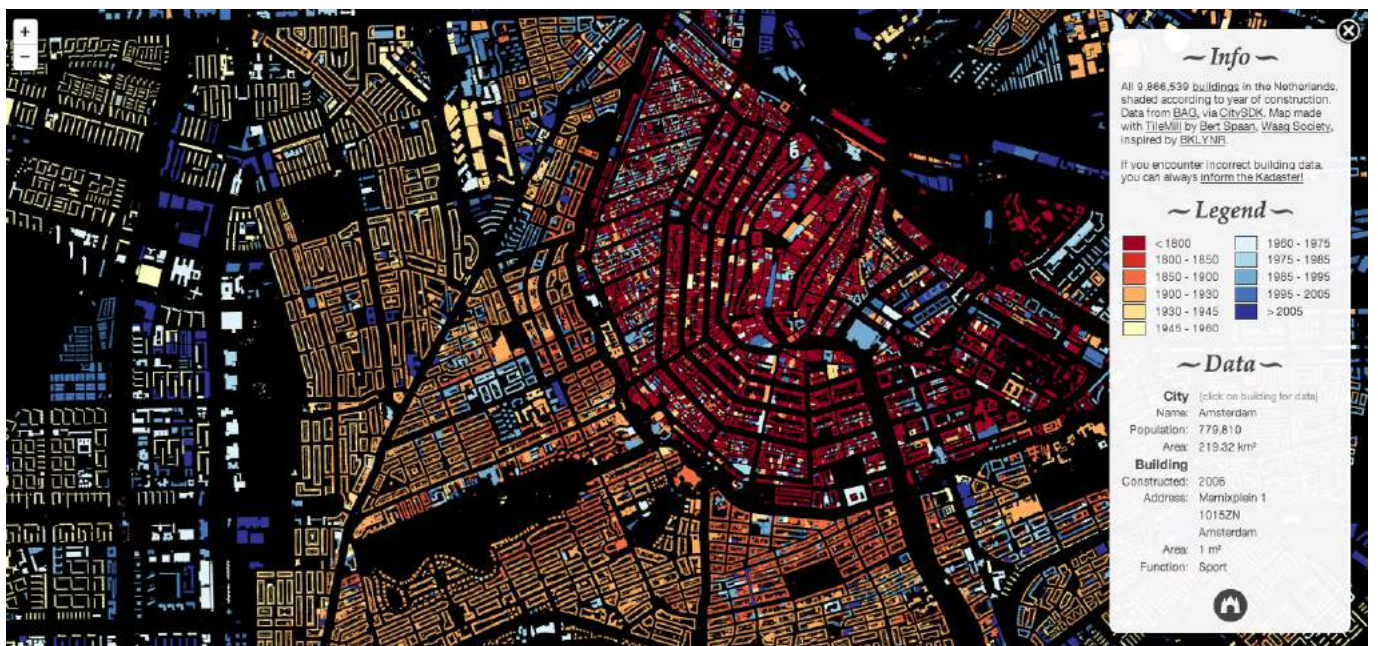
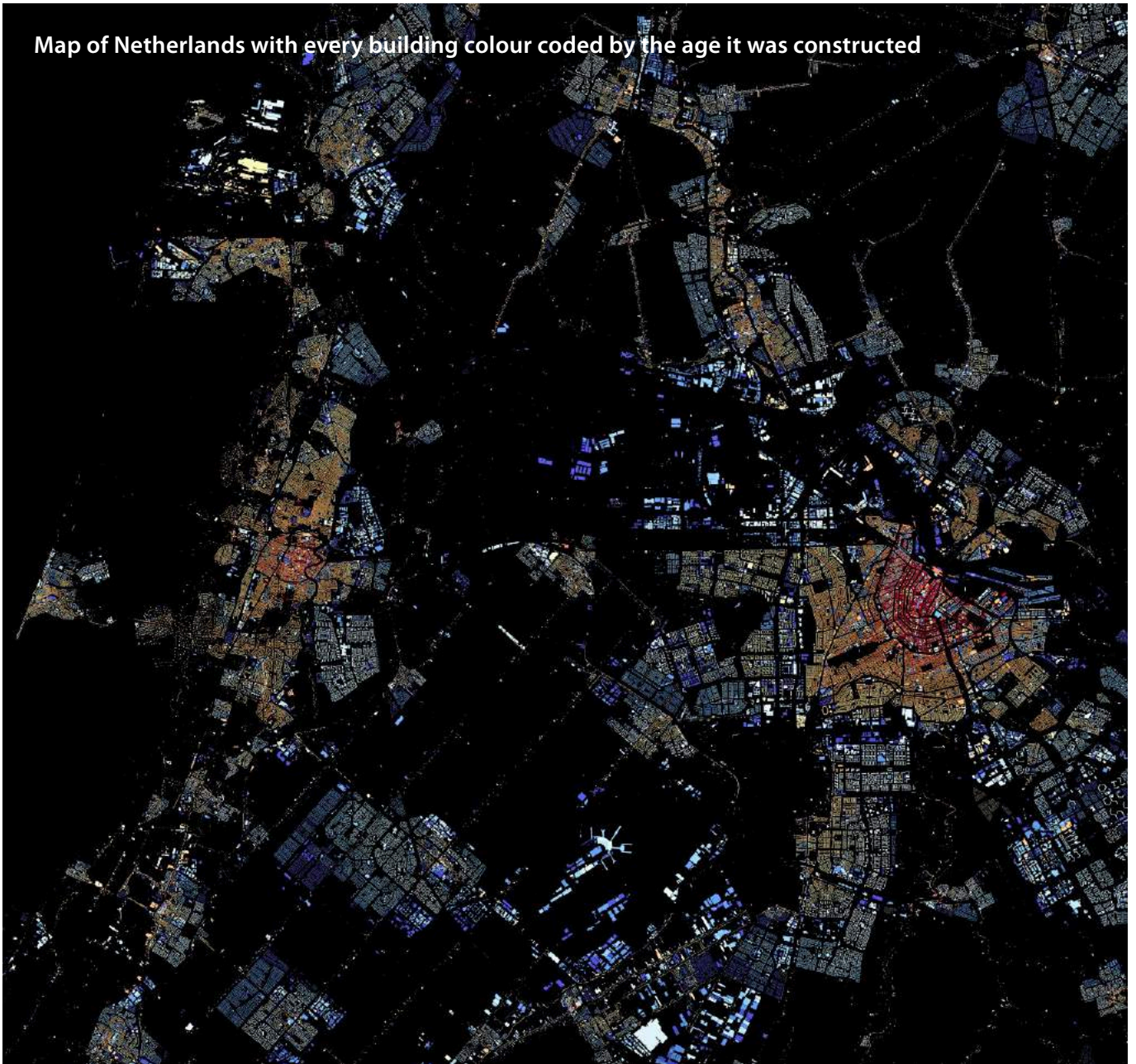
## 1.4 Using State Lands for Strategic Purposes

The Housing Agency supports the use of State lands for Strategic purposes and the establishment of a National Land Development Agency.

### Recommendations

- **NPF to provide greater detail on how state lands will be used for strategic purposes.**
- **NPF to commit to carrying out Strategic Land Availability Assessments** to establish realistic assumptions about the availability, suitability and the likely economic viability of land, including state owned land, to meet the identified need for housing over their plan periods and for the life of the NPF.
- **NPF to provide guidance on release of state owned land to ensure that it is used for the public good.**

Map of Netherlands with every building colour coded by the age it was constructed



# 02 Housing

## The National Planning Framework (NPF) provides a framework for the delivery of new homes for all tenures in sustainable communities.

Section 5.7 of the NPF, Housing, includes six National Policy Objectives directed at the delivery of 550,000 additional homes by 2040 and notes that *the long term vision for Ireland's future aims to balance the provision of good quality housing that meets the needs of a diverse population, in a way that makes our cities, towns, villages and rural areas good places to live now and in the future and to prioritise the provision of new homes in sustainable locations and at an appropriate scale relative to location based on evidence* (National Policy Objectives 34 and 38).

Whereas we welcome the vision for housing contained in the NPF, the NPF should **be more specific in relation to the measures needed to ensure that we plan positively to achieve quality environments** and to remedy the existing disconnect between what we aspire to in our built environment and what we achieve.

### Recommendations

#### 2.1 Quality place-making

**NPF to situate housing provision within the context of good quality place making** with requirement for integrated plans for housing, employment, public transport and other uses based on an assessment of need within an area. Plans to be evidence based and to identify the mix of housing type and tenure required. Assessment of the existing built environment to be the starting point. Local and neighbourhood area plans to be prepared with the objective of facilitating planning certainty and supporting sustainable development.

Local planning authorities to identify sites and buildings that are critical for the delivery of their housing strategy.

Local authorities to have a requirement for **minimum as well as maximum densities in certain areas.**



Billancourt, Paris – three-dimensional modelling, with emphasis on creating streets and squares. Heights were set at plan stage with some re-modelling agreed at design stage.



## 2.2 Design quality

NPF to provide **a commitment to good design**. The requirement for good design to be embedded in the NPF and in development plans with good design recognized as a key component of good planning. Planning policy to ensure that development plans set out the **quality of development expected** within areas based on stated objectives that take account of the defining characteristics, qualities and distinctiveness of the area. The NPF to commit to the **use of design reviews appropriate to the scale and characteristics of a development**.

NPF to **encourage innovation and flexibility in the way we design our homes** to allow for future changes in climate, demography, work patterns and life style patterns.

## 2.3 Plan lead development – spatial planning

That **greater use is made by of local area plans and that design guides** and design codes are required for all large developments (100 plus houses), and that more use is made of three dimensional modelling as a tool to oversee development and to create planning certainty.

## 2.4 People and places

Planning policies and decisions to **address the connections between people and places** and the integration of new development into the natural, built and historic environment and into existing communities.



## 2.5 Planning, urban design and architecture

Mechanisms to be put in place at national and local level to ensure that the aspirations to excellence in sustainable place making is achieved. Best practice Urban design principles to underpin all decisions on the design and location of housing. **NPF to emphasise the importance of urban design in creating successful places.**

*Homes are both places where we live and the foundation stone from which wider communities and their qualities of lives are created.* (Introduction to Section 5.7 of the NPF) Housing design takes place within the context of place making and successful place making is facilitated by a consistent vision that is followed through from the initial planning stage to the detailed design of individual dwellings. More than for any other building type, housing depends on the disciplines of planning, urban design and architecture working effectively together towards a common vision. NPF to support **initiatives**, such as annual joint forums, **that bring the disciplines of planning, urban design and architecture together.**

## 2.6 Brownfield sites and built-up areas

The 'best', most sustainable housing solutions should also be the easiest to achieve. Often the 'best' option will be to build housing in existing built up areas. These are often areas where there are multiple stakeholders with competing interests, resulting in uncertainty and high costs. Measures, such as **increasing planning certainty**, to be put in place to ensure that the development **of existing built up areas** can progress more easily than the development of green field sites, and thereby become the preferred option.

These include:

- Measures to **encourage the use of existing vacant commercial and residential building** stock in built up areas such as broadening the exemption and changes of use between use classes.
- Measures to **facilitate the assembly of sites.**
- Measures to ensure home owners, builders and developers and staff in local authorities have a clear understanding of the technical and administrative issues involved in developing, from inception to completion, city centre and brown field sites. The NPF provides an opportunity for the Planning Authority to commit to ensuring that the **necessary support and guidance to those wishing to re-use existing buildings and work in urban/brownfield areas** is available.

## 2.7 Existing housing stock

NPF to note the strategic importance of upgrading our existing housing stock in urban areas and the need to **recommence undertaking national house condition surveys** and use a standard measurement to rate houses and apartments against. For example, the decent home standard used in the U.K.

## 2.8 Density

NPF to **support making the suburbs an integral part of our cities with higher densities achieved through careful urban planning and design.** Densification to be based on a clear idea on how our cities and suburbs will develop over time. **Review of impact of densification on the provision of local services**, such as street cleaning, rubbish collection, noise abatement etc. to be undertaken. All densification to pay regard to our green areas and all areas to have a green area plans.

## 2.9 Inclusion

NPF to ensure that ***inclusion is a hallmark of all housing and communities*** and that the planning process includes the creative participation and accommodation of all including the new Irish, older people, the travelling community, young adults, children, and those with special needs in how we plan for the future. We need to ensure that the places we create and housing we build suits the needs of all now and into the future.

More needs to be done to ensure that people with disabilities can access housing to suit their needs. The NPF should commit to ensuring that, within its lifetime, an adequate supply of housing will be made available for older people and people with disabilities, across all tenures. National targets, that take account of the inaccessible nature of much of our existing housing stock are required.

The report, Housing for Older People – Thinking Ahead by the Housing Agency and Ireland Smart Aging Exchange Policy highlights the need to support the desire of older people to live independently within their existing communities.

## 2.10 Use of Data

The emphasis in the NPF on the use of data to inform housing policy is welcome but the need for ongoing research and policy analysis informed by data should also be stated. Without the associated commitment to research and policy analysis, there is a danger that un-supported data could be used as a tool to support particular policies / and ideologies.



# 03 Summary of recommendations

## General recommendations

	Recommendation
1	Provide more detail in the introduction on how planning is structured in Ireland, on the status of the NPF, and on how it will influence decisions made at regional and local level. Describe how the NPF can act as an effective framework for future planning.
2	Ongoing use of comparable indicators on items such as of quality of urban environment, housing stock, public transport, access to retail etc. to be used to measure achievement.
3	Place a <i>presumption in favour of sustainable development</i> <sup>4</sup> at the heart of all decision making.
4	NPF to stress the importance of making best use of the existing building stock.
5	NPF to include a set of planning (land use) principles.
6	NPF to clarify status of its Policy Objectives and describe how these Policy Objectives will be monitored and implemented. Summary/appendix to include a list of the 70 policy objectives included in the NPF.
7	NPF to include commitment to investment in research.
8	NPF to expand on role of planning in helping to create a fairer society.
9	NPF to state that Property Registry Data will be made readily available.
10	NPF to commit to the principle of active plan led land management
11	Land Development Agency, or a similar organisation, to act as an overarching body to co-ordinate transport, services and development nationally and to co-ordinate and support plan led development at national level to be considered.
12	Introduce mechanisms to foster and assess quality and to ensure that procurement supports design quality and and to ensure that the value of good planning (and design) is communicated to the public.
13	NPF to commit reviews of existing policies, structures and resources.
14	NPF to reference and support the Key Commitments contained in the UN New Urban Agenda – Habitat III, which sets a global standard for sustainability in cities.

4. Refer to National planning Policies Framework, Communities and local Government, March 2012 page 4.

## Growth targets

	<b>Recommendation</b>
<b>1</b>	More realistic targets that support growth of our smaller towns and villages, while recognising existing trends, to be considered.
<b>2</b>	Carry out timely reviews of the broader policies that influence growth patterns, to ensure that infrastructure supports and takes the lead in supporting actual patterns of growth.
<b>3</b>	NPF to state that the aim is to actively seek to maximise growth in built up areas.
<b>4</b>	Planning Policy to be strongly proactive in introducing measures to put a stop to the proliferation of one-off houses in rural areas and to ensuring that almost all new development outside our major towns takes place in smaller towns and villages.
<b>5</b>	NPF to indicate the broad range of measures required (including governance structures, planning policies that support development of brown field sites, public education programmes, incentives, pilot studies, urban task force, support etc.) to support the presumption in favour of development in built-up areas.
<b>6</b>	NPF to commit to establishing a national programme for recording and analysing our existing building stock.
<b>7</b>	Targets for re-use of existing buildings in built up areas, for addressing underuse of existing buildings and for reducing the rate of obsolescence should be identified and fed into planning policy and into growth targets.
<b>8</b>	NPF to include more detail on the powers, remit and resourcing of the planning regulator.
<b>9</b>	NPF to provide greater detail on how state lands will be used for strategic purposes.
<b>10</b>	NPF to commit to carrying out Strategic Land Availability Assessments.
<b>11</b>	NPF to provide guidance on release of state owned land for the public good.

## Housing

	<b>Recommendation</b>
<b>1</b>	NPF to be specific in relation to the measures needed to ensure that we plan positively to achieve quality environments and to remedy the existing disconnect between what we aspire to in our built environment and what we achieve.
<b>2</b>	NPF to contain a requirement for integrated plans for housing, employment, public transport and other uses based on an assessment of need within an area.
<b>3</b>	Local planning authorities to identify sites and buildings that there are critical for the delivery of their housing strategy.
<b>4</b>	Local authorities to include a requirement for minimum as well as maximum densities in certain areas.
<b>5</b>	Requirement for good design to be embedded in the NPF and in development plans.
<b>6</b>	NPF to commit to the use of design reviews appropriate to the scale and characteristics of a development.
<b>7</b>	NPF to encourage innovation and flexibility in the way we design our homes.
<b>8</b>	Ensure greater use is made by of local area plans and that design guides and codes are required for all large developments (100 plus houses). More use to be made of three dimensional modelling as a tool to oversee development and create planning certainty
<b>9</b>	Planning policies and decisions to address the connections between people and places and the integration of new development into the natural, built and historic environment and into existing communities.
<b>10</b>	Mechanisms to be put in place at national and local level to ensure that the aspirations to excellence in sustainable place making are achieved. NPF to emphasise the importance of urban design in creating successful places.
<b>11</b>	Encourage the use of existing vacant commercial and residential building stock in built up areas such as by broadening the exemption and changes of use between use classes. Facilitate the assembly of sites. Provide support and guidance to those wishing to re-use existing buildings and work in urban/ brownfield areas.
<b>12</b>	NPF to note the strategic importance of upgrading our existing housing stock. Undertaking national house condition surveys. Establish a standard measurement to rate houses and apartments against.
<b>13</b>	Carry out review of impact of densification on the provision of local services.
<b>14</b>	Ensure that inclusion is a hallmark of all housing and communities. Commit to an adequate supply of housing being made available for older people and people with disabilities, across all tenures.
<b>15</b>	Carry out ongoing research and policy analysis informed by data.

# 04 Further contact / information

If you have any queries on this submission please contact Isoilde Dillon **isoilde.dillon@housingagency.ie** or 01 656 4100.



[www.housingagency.ie](http://www.housingagency.ie)