

SHD Review
Planning Policy Section
Department of Housing, Planning and Local Government
Custom House
Dublin
D01 W6X0

Email to **SHDReview@housing.gov.ie**

14 August 2019

Dear Sir/ Madam

Public Consultation – Review of the planning provisions regarding Strategic Housing Developments

The Royal Town Planning Institute (RTPI) Ireland is a leading planning body for spatial, sustainable, integrative and inclusive planning. We work to promote the art and science of planning for the public benefit and doing so we:

- support policy development to improve approaches to planning for the benefit of the public;
- maintain the professional standards of our members;
- support our members to have the skills and knowledge they need to deliver planning effectively;
- maintain high standards of planning education;
- develop and promote new thinking, ideas and approaches which can improve planning;
- support our membership to work with others who have a role in developing places; and
- improve the understanding of planning and the planning system to policy makers, politicians, practitioners and the general public.

Thank you for the opportunity to comment on the review. Our comments are set out below.

We welcome the proactive approach that Government is taking and priority it is giving to delivering new housing however it is our view that there is a need to more explicitly recognise that planning has much to offer and it is not a barrier to this. Actions should not necessarily focus on streamlining processes but rather look to what the planning system can do proactively to provide a routemap which gives a clear approach to delivery. Good planning is part of the solution to the housing crisis. With the right tools planners and the planning system can help to deliver more quality housing. We need to allow planners to plan for the best and most sustainable locations for housing.

Given this the Institute still has concerns about the Strategic Housing Developments process ‘centralising’ decision making to An Bord Pleanála on housing development over 100 homes and the implications of removing more planning functions from Local Authorities. We are of the view that

this cannot continue indefinitely, although we appreciate that there can be specific circumstances in a time of housing crisis where this approach may be appropriate on a temporary basis. If a further extension is put in place systems to develop the role of Local Authority decision-making should be considered for a longer-term strategy post the extension.

RTPI Ireland would like to see a strategic and planned approach to housing delivery whereby housing sites and infrastructure are assessed and identified through the development plan process to ensure that they are in sustainable locations, supported by State investment where required. The new National Planning Framework is a good example of this which can provide certainty, predictability and a long term vision for the country, linking development and the infrastructure it requires. We agree that acceleration the delivery of more houses is priority but we need to ensure that the quality of these homes and the neighbourhoods that they will form are of a high quality in terms of design, sustainability and energy efficiency

It is our understanding that around 9,000 homes have been given planning permission since the introduction of the new arrangements, however, this does not means that these have been built. Delivering new housing requires much more than a planning consent and therefore the Institute believes that the Government should recognise, articulate and continue to take action that supports the financing and funding of new housing, the provision of the necessary infrastructure and services required through new housing developments and ensuring that there are adequate skills, labour and materials available.

There is also a need to ensure that planning permissions are implemented where they can be through a 'use it or lose it' approach that is time bound, monitored and policed with agreed enforcement procedures. The Government should also ensure that any taxation measures put in place to stimulate development are spatial and tailored to meet specific local circumstances; are plan-based and embedded in approaches outlined therein; and combine approaches that provide both 'carrot and stick'.

RTPI Ireland also has concerns that there may be duplication of work and confusion around pre-application discussion with planning authorities and how this is related to An Bord Pleanála. We note that An Bord Pleanála has provided increased resources by the Government to support its new role. This points to a need to resource the planning service as a whole to help deliver these reforms and to support planning to deliver new homes.

Strategic Housing developments could have a significant impact on local services and infrastructure which may already be over-stretched, but the process limits the provision of additional services in any application. There is a concern that such projects may exacerbate single mono-functional land use which is not best practice in terms of providing a good quality of life for residents or flexibility of use and which may increase commuting, pressure on public transport / private car usage and adverse environmental impact.

We would be happy to discuss or clarify any aspect of our submission. Our Director, Craig McLaren can be contacted on 08925 15649 or contact@rtpiireland.com if you would like this be arranged.

Yours faithfully

Aidan Culhane

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Chair