

Introduction

The Chartered Institute of Building is the world's largest and most influential professional body for construction management and leadership across the built environment.

We have a Royal Charter to promote the science and practice of building and construction for the benefit of society, and we've been doing that since 1834. Our members work worldwide, and across the island of Ireland in the development, conservation and improvement of the built environment.

We accredit university degrees, educational courses and training in universities and colleges in Ireland. Our professional and vocational qualifications are a mark of the highest levels of competence and professionalism, providing assurance to clients and other professionals procuring built assets.

The CIOB also has a dedicated policy and research function, whose expertise we have drawn on in the preparation of this response. To ensure that we captured the breadth of views from thousands of CIOB members across Ireland, our members have also been consulted in the preparation of this response.

Our response focusses on the chapters deemed most relevant to the Institute's expertise:

- Chapter 1: The Vision
- Chapter 2: A new way forward
- Chapter 5: Planning for Diverse Rural Places
- Chapter 10: Implementing the National Planning Framework.

Chapter 1: The Vision

This vision expressed in this Draft is the correct one. As a small island nation with a growing population, a housing affordability and supply crisis, and a prosperous economy characterised by a booming urban jobs market, Ireland's spatial development should be based on compact growth, and regional connectivity.

The main difficulty with the Draft is that it remains just that: a vision. The lack of measurable deliverables, concrete actions, and specific processes whereby the aspirations of the revised NPF are to be realised calls into question the *raison d'être* of the Draft.

The majority of what the document talks about is eminently sensible, sustainable planning policy. However, the language is general to the point of inconsequentiality, and the governance structures are too nebulous, under resourced or, in the case of some of the stated ambitions, simply non-existent, to provide a practical framework whereby these actions can be delivered.

This lack of pragmatism is borne out by the evidence. The 2018 NPF is 6 years old, and it suffers from the same lack of measurable outcomes and concrete processes that plague the Draft. Indeed the Draft refers to the Expert Group Review of 2018 NPF Strategy and Implementation (The Review Group) report that points out:

- Compact growth targets should be more ambitious and more clearly defined;

- The roles of the bodies involved in its implementation should be clarified and strengthened (particularly in relation to the Metropolitan Area Strategic Plans) and mechanisms put in place for more detailed measurement and monitoring of its progress; and
- There should be greater coordination at whole of government level across all infrastructure projects (including the NDP) and new efforts made to generate broader support for national spatial planning across all of society.

Yet these three issues remain rife throughout the Draft. While mention is made of their importance, the lack of clearly defined targets, mechanisms for detailed measurement and monitoring of progress, and lack of cross government coordination on issues germane to the NPF remain the central barriers to the credibility of the Draft as a document and the general principle of the NPF.

The Draft mentions each of these issues, but it does not address them beyond indicating that the authors' are aware of them.

Take compact growth, the Review Group's report calls for more clearly defined targets. In response the Draft talks about 'Targeting a greater proportion (40%) of future housing development to be within the existing 'footprint' of built-up areas'.

The language here is worryingly general given that the Review Group flagged the lack of clearly defined CG targets as a central problem with the NPF. What does 'targeting' mean? Is the target flexible to being downwardly revised if the development sector don't regard compact growth sites as 'viable'? Does future housing development mean future planning permissions; completed units; commencements? What is the number of new houses that will happen within existing built up areas? What is the time span indicated by 'future'? Is a 'built up area' an existing settlement?

So, the questions arise: how many new housing units will be built within existing settlements over what time span? '40% of future housing developments' is too unclear and we urge the authors to clarify what this means in terms of the number of housing units, and over what time scale lest the Review Group's criticism apply to the Draft as it does to the NPF.

This is one example of a wider trend in the document, whereby the high level principle of sustainable planning is articulately captured, but the practicalities of how that principle is to manifest in Ireland's built environment sorely lacking. This repeats the mistake of the 2018 NPF and we urge the authors to correct it as a matter of urgency.

Chapter 2: A new way forward

Compact Growth

As mentioned in our response to Chapter 1, the lack of clearly defined compact growth (CG) targets mitigate against its success as a guiding principle of the Draft. The intention of 'Targeting a greater proportion (40%) of future housing development to be within the existing 'footprint' of built-up areas' is simply too vague to be enforced or measured. Unless this language is tightened

up and more clearly defined, the Review Group's observations that the 2018 NPF's CG targets were not sufficiently clearly defined will legitimately apply to the Draft too.

Some guiding questions that may facilitate clarifying the compact growth targets include:

- How many housing units? Does this mean planning permissions? Commencements? Completions?
- Over what time scale?
- What does targeting mean? Is it different to delivering? Presumably 'targeting is being used to allow for flexibility on the proportion of building that can be defined as 'compact growth'. If so under what circumstances is the target flexible? If the development sector claim viability challenges with parcels of land in existing settlements is this sufficient to relax the target?
- What metrics will be used to quantitatively assess the delivery of this target?

The need for more clearly defined CG targets is borne out by the evidence. The 2018 NPF had the stated intention of 'Targeting a greater proportion (40%) of future housing development to be within and close to the existing 'footprint' of built-up areas'. Yet, despite this target, new housing development in Ireland since 2018 has continued to be mostly peripheral.

Taking Dublin and its periphery as an exemplar of a wider national trend, the location of new housing completions is incongruent with where the need for housing is greatest. The most extreme housing need – as captured by employment and population growth - since 2018 has been in Dublin City, but the location of new housing development belies this truth. Instead of producing housing where need is greatest, our housing system is producing – by a multiple of three – development on the periphery of settlements.

This problematic trend is most acute for Dublin. [According to CSO data](#), between 2017 and 2022 there have been 7,024 housing completions on the periphery of Dublin, and 2,458 in Dublin city. Nearly three times the rate. More worrying still is that the houses being built on the periphery of Dublin, typically to serve Dublin, are themselves being built on the periphery of settlements.

New housing developments in Naas, Navan, Dunshaughlin, Celbridge and Bray are being built a few kilometres outside these towns. Regionally balanced growth is a good thing, but new housing developments on the edges of towns to serve an urbanised Dublin-based workforce is not. These developments bake in car-dependency and congestion, make public transport, schools, and doctors' surgeries unviable, hollow out nearby towns and – from a mental- and physical-health perspective – encourage isolation and sedentary lifestyles. In short, instead of meeting housing need where it exists, peripheral development creates extra societal burdens.

The intuitive response to this trend is that there is not enough land available in Dublin city to accommodate new housing, so development is forced out to the periphery. The data simply does not support this claim. Across any metric, there is more than enough land in Dublin City to meet its housing need according to the principle of compact growth as outlined in the NPF. There are roughly 4,500 hectares of land zoned specifically for residential development (Z1 or Z2 zoning), [said a 2018 council report](#). At recommended medium densities this would allow for more than 150,000 homes. There are also 2,600 hectares of zoned land with capacity for some form of

residential development. Across all of Dublin, [there is enough publicly controlled](#) zoned land to build 58,200 dwellings.

Furthermore, there was more than 60 hectares of vacant or derelict land, spread over 282 sites between the canals in central Dublin, a 2013 [council audit found](#). This is leaving aside land currently devoted to large-scale surface car parking, bus depots, underused industrial estates, and military barracks in Dublin city, all of which represent an extremely inefficient use of land in the centre of a capital city and could be repurposed for housing. In short, there is ample developable land in Dublin.

The 2018 NPF supports CG and flags this abundance of developable land in urban areas. If land is available and national policy supports development within cities, why are there three times as many houses being built on the periphery of Dublin than in Dublin city? This is the question that the Draft needs to grapple with given that the same 40% target for compact growth is being reused from the 2018 NPF. It is simply not sufficient to restate the 2018 target without grappling with the causes of why compact growth is failing to take place at the scale required or ambition outlined in the NPF.

There is not one reason behind this spatially imbalanced growth, but institutional lethargy around direct delivery of housing, and a consequent overreliance on the private development finance model goes some way to explaining the peripheral-development trend. The private development finance model requires a profit margin of 15–20 percent on any project. This automatically makes many Dublin city sites “unviable” for delivering the housing that will meet local need. It is easier, cheaper, and more profitable for developers to build on greenfield sites on the periphery of settlements like Dublin, where they have carte blanche to reproduce housing estates according to a template, rather than having to negotiate any of the complexities involved in urban sites.

Where the peripheral land is bought at agricultural-use value, securing planning permission for residential use also allows developers to increase the asset value of the land by as much as 100 times per hectare. This windfall gain is not as easy to come by in existing settlements like Dublin, where land is typically already zoned, and purchased at residential prices.

Ireland’s reliance on the private development finance model means that, despite the principles of the NPF, we are master-planning housing for our cities according to land values, rather than according to where housing is needed most. This planning by land value is what the CG ambitions of the Draft needs to address. As above, it is not sufficient to simply state a compact growth target of 40% without addressing the mechanics of why that target has not been achieved since 2018.

The absence of a resourced and empowered local development corporation charged with building houses on public land has led to this reliance on private development, and indeed a willingness to sell off valuable public assets where the tenure and type of housing will be dictated by “viability” and the 15–20 percent profit margin. The Dublin Docklands Development Authority, which took over lands owned by the ESB, Bord Gáis and others and delivered thousands of homes, provides the model for what needs to be done across Dublin city. The Land Development Agency is a step in the right direction in that it leverages public land to deliver housing, but the divisions of tenure type – even the revised 50 percent for market housing – are not ambitious enough to meet the scale of the challenge.

It is this failure to grapple with the mechanics of why peripheral development is happening that is a central problem with the Draft. It is not enough to simply state a vague target of 40% of new development, without coming to grips with the mechanics of why CG is not happening at the scale set out by the NPF's 2018 aspiration. Worryingly, the Draft simply reuses the same 40% target as the 2018 NPF, despite the call by the Review Group for more ambitions and clearly designed CG targets.

The Draft must offer a diagnoses of why CG has not happened at desired scale and why peripheral development is still rife. The Draft could then offer potential solutions to that failure, and consult on those solutions. The current consultation lacks any questions, or targeted feedback that would facilitate a detailed overview of the process whereby CG could be achieved.

In terms of CG, there is also tension within the draft between the principle of CG and some of the stated aims for regional development. For instance, despite the prioritisation of the overall principle of compact growth within the document, the delivery of the Galway Ring Road is described as a 'key future growth enabler', alongside the 'progressing the sustainable development of greenfield sites' in Galway. We urge the authors to give consideration as to how the development of a ring road may result in the unintended consequence of new housing development taking place in greenfield sites along that road, thus encouraging peripheral rather than compact growth.

To sum up the issue, below we quote at length from the Review Group's report on Compact Growth and the NPF:

'...these current [Compat Growth] targets will not deliver compact growth, because even if these objectives can be met (and evidence about this is still unclear), they allow between 50% and 70% of all new homes to continue to be built at greenfield locations (i.e., beyond the edges of settlements). In effect, this means that unsustainable greenfield development at this scale across the country in the years ahead could be said to be consistent with the current targets in the NPF. At least in theory, and likely in practice, this allows county and city development plans (and individual project approval decisions) to depart from national 'compact growth' principles at a significant scale.'

Transport Oriented Development: governance issues

NPO 10: Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up area of the five cities or a metropolitan town.

The Draft, like the NPF before it, has lofty ambitions for TOD. This is commendable.

However, as is the case with CG, the details of how TOD will be delivered are lacking. Again, given the 6 years of evidence we have since the publication of the NPF, and the continued dominance of peripheral development, this issue must be addressed in the Draft.

Despite TOD being a national planning policy priority for over 6 years, Ireland is still pursuing large scale transport infrastructure projects without giving due consideration to the details of how these projects will deliver housing, and their potential to deliver housing at the genesis of the business case stage.

For instance, the business case for MetroLink states that it ‘...will encourage compact growth development in housing’. Taken alongside NPO 10 above, neither the NTA or the DHPLG lack the vision for TOD. However, neither organisation has explained the specific processes or governance structures whereby TOD will take place. Unless this detail is provided, and the structures are put in place to execute TOD, NPO 10 will remain aspirational, and the governance of infrastructure projects will remain siloed from the governance of housing delivery.

A joined up approach to active land management and land value capture by a public authority on parcels of land adjoining new transport infrastructure such as Metrolink are a proven way of ensuring TOD actually happens. In our view creating the governance arrangements – namely a formalised role for housing delivery within the NTA – is essential to making the TOD aspirations in the Draft credible.

Thankfully there are international exemplars of well executed TOD that Ireland can learn from as we embark on a new era of large scale transport infrastructure projects. Hong Kong built an entire metro and funded public housing for free using land value tax; a significant amount of London’s new Crossrail line has been funded with a direct land value uplift tax; and urban regeneration in the US is typically funded through a value uplift capture mechanism called “tax increment financing”.

From a governance perspective, and reflecting on the Draft, both Crossrail and the Hong Kong Metro Development corporation, each had an arm that was responsible for housing delivery. The transport bodies in Ireland that are Germaine to the NPF do not have such a function. The Draft is an opportunity to change this.

Profit-sharing deals with developers, partial ownership of new developments, and on-site property rentals can all yield revenue to help pay for new investments in transit. These approaches can ease the financial strain of expanding public transit while making cities better places to live and work

Direct Measures

In London, part of the Crossrail, which runs beneath the streets of the capital, was funded through “direct instruments”. In other words, measures that try to recoup some of the value created by investment in infrastructure through a direct tax on the uplift in land values that stems from the infrastructure project. In that case, businesses funded part of the project through a “Business Rate Supplement”, which was essentially a tax on the new footfall and business that the project will bring about.

Meanwhile, the Hong Kong Metro is the gold standard when it comes to funding rail projects using land value uplift capture and building houses alongside the line. Not only has the government funded all of the Hong Kong Metro through value capture, but it is also makes an ongoing profit from it. This “Rail Plus Property Model” is based on the principle that the new rail project will increase nearby land values. Working with the rail development corporation, the government leases nearby land parcels to housing developers once the value uplift has occurred – thus ensuring a healthy profit. By the terms of the lease, the government also gets a share of the profits that developers make from these properties. By capturing part of the value of the land and property around railway lines, Hong Kong generates funds for new projects as well as for operations and maintenance of the metro itself.

In a country with a housing shortage, this kind of strategic planning would be welcome in Ireland, and the Draft is an ideal opportunity to instigate it.

Alternatively, there's also tax increment financing (TIF) used in the United States, and also in London to fund the extension of the Northern Line. It's a funding strategy to promote economic development within a designated area that is deemed underdeveloped and in need of regeneration and housing. TIF is used to divert anticipated property tax increases, which come about as a result of transport infrastructure projects, to a dedicated fund, which is then reinvested into public infrastructure and housing within the TIF district.

All of the above are based on the same principle: public investment in infrastructure creates value. It's only fair that this value should be democratised. There is no difference in the principle of how this all works between Ireland: public investment on or near a piece of land significantly increases its value wherever you are.

The difference lies in our Ireland not having the joined up, formalised governance structures that cut across departmental siloes to reflect the multi-disciplinary nature of planning, infrastructure and housing. Other planning systems internationally building or expanding public-transit systems to cope with population growth and urbanisation have acted swiftly to both recognise and exploit rising land values for the public good.

This Draft is an opportunity to connect the dots, and create the governance structures such that new transport infrastructure projects are grounded in the principle of TOD.

Chapter 5: Planning for Diverse Rural Places

One Off Housing

The Draft does not do enough to stem the growth of single/'one off housing in Ireland. According to [Census 2016](#), one-off houses (defined as occupied detached houses with individual sewerage systems) comprised 442,669 dwelling units – 26% of the approximately two million occupied dwellings in the country. Between 2011-2016, almost 40% of all homes constructed were one-off houses, and for seventeen counties, one-off housing comprised over half of all dwellings built. Since 2016, in terms of housing completions, the number of one off housing has continued to increase year on year, with [3612 completed in 2016, and 5148 completed in 2023](#). This is alarming, particularly given the NPF and the Draft's guiding principle of compact growth.

Given the social, environmental and economic impact of one of housing, the Draft is an opportunity to prevent unnecessary growth in this housing typology. Upholding the desire of many to live outside cities is a legitimate goal of spatial planning, though should not be done at the expense of the environment, congestion, and housing delivery. Furthermore, according to [Daly \(2021\)](#), the main beneficiaries of one-off housing are not farmers but managerial and technical workers who commute to urban centres via private cars. This trend of urban commuters living in one off houses in the urban hinterland has arguably been exacerbated by the NPF's allowing 'social' need as a criterion for one off house building. Currently, one-off housing is allowed for agricultural workers, for people who grew up in the area in question, and for people who have been living there for fifteen years or more.

The Government's 1997 sustainable development strategy flags that from one off housing:

- *'there is a negative impact in terms of the urban fabric of towns.'*

And

- *'In general, there must be a presumption against urban-generated one-off rural housing adjacent to towns.'*

Since then, the prevalence of new build one off housing units in Ireland belies this environmental maxim. In keeping with the principles of sustainable development outlined in the Draft, ideally one off housing would only be permitted in situations where a household has an economic need for proximity to a given piece of land, typically for agricultural work. Otherwise, housing needs should be met within existing villages and towns, as per the principles of compact growth. This is particularly important in Ireland, where many towns and villages have been in decline over the last 30 years. The prevalence of one off housing has seen the hollowing-out of our rural towns and villages, stripping them of their commercial and service functions which support local rural economies, while dragging ever wider rural hinterlands into the [commuter catchments](#) of larger cities

Given that, as a typology, one off/single housing, despite attempts at policy intervention via the NPF in 2018, still makes up a significant proportion (20-25%) of new housing being delivered in Ireland, the Draft is an opportunity to reflect on what more can be done to prevent this unsustainable development.

Take Galway as an example of the Draft acting antagonistically to its own stated principles of compact growth and sustainable development. County Galway has the highest proportion of one off housing in the country, with 60%. It is therefore surprising that the Draft indicates support for the Galway Ringroad, as well as greenfield housing development in Galway– a combination which, research and mapping indicate results in the kind of peripheral, sporadic development that the Draft – in its allusion to compact growth principles – seeks to arrest.

[Data gathered by An Taisce](#) shows that the propensity of new, one-off housing development in Ireland to be built on the periphery of settlements is exacerbated by the building of motorways. The Draft's comments on Galway, greenfield development, and the aforementioned vagueness of the targets for compact growth suggest that this will invite further peripheral development in future.

The 'Sustainable Residential Development and Compact Settlements Guidelines for Planning Authorities' referred to in the document are sensible measures, and we would encourage the dovetailing of these guidelines with the removal of the 'social requirement' for housing need which has led to an overly permissive approach to one off housing in rural Ireland. If the basis for one off housebuilding is only economic, combined with grants and the strategic approach to the development of existing rural settlements, this would go some way to encouraging more sustainable development patterns in Ireland.

Modern Methods of Construction (MMC)

Furthermore, from the construction sector's perspective, the prevalence of one off rural housing, impedes the use of Modern Methods of Construction for residential development.

[As the CIOB has argued in our recent research paper on the topic](#), MMC is generally accepted in the industry as a way of delivering high quality residential units, in a faster and more sustainable manner than existing building practices. However, one off housing does not admit of this approach because the need to negotiate with each site on an individual basis impedes the ability to standardise the housebuilding process, which is the basis for the efficiency gains from MMC approach to house building.

Integral to any manufacturing process, if the efficiency potential of the technology is to be realised, is standardisation. Standardisation can mean many things including repetition of manufacturing tasks and methods, but also standardisation of contracts, drawings, reports, and data collection within projects. It has been argued that a large number of different housing designs poses a barrier to realising MMC economies of scale in Ireland (IBEC, 2021). Reddy (2020) finds that the small-scale nature of many Irish construction projects and the consequent bespoke design renders MMC unsuitable or unviable.

This is listed as the most important out of 22 barriers (ibid.) By continuing with a permissive regime to one off housing, the Draft will impede the cross Governmental stated aim of [more uptake of MMC in the housebuilding sector](#). For this, and other sustainable development reasons outlined above, we urge the authors of the Draft to reappraise the policy approach to one off housing.

Chapter 10: Implementing the National Planning Framework.

We welcome the inclusion of a chapter focussed on 'Implementing the National Planning Framework'. Given the aspirations in the Draft, we agree that it is crucial to its success that a concrete plan for its implementation is included.

However, we have reservations as to whether the implementation actions outlined in chapter 10 are sufficient to ensure that the principles in the Draft are successfully implemented. Below we respond to some of the plans outlined in chapter 10 of the Draft.

Generally, the issue we would like to raise with this chapter is that it focuses on reforming processes rather than outcomes. Given the general concerns we have raised around the lack of measurable, clearly defined impacts in the Draft, this is a concern.

For instance, the Draft points out the role of the Office of the Planning Regulator (OPR)

Through its work in this area since its establishment in 2019, the Office has enhanced the quality of the statutory development plan-making process nationally by ensuring that planning authorities apply consistent and best practice approaches to the development of their areas while also working towards the achievement of broader regional and national policy objectives.

The OPR may well have enhanced the quality of the plan making process, but the question then arises: what about the outcomes of the plan making process? As discussed elsewhere in our response, Ireland is continuing its trend towards peripheral development, alongside high levels

of dereliction in our towns and cities. The Draft should take the opportunity to measure the outcomes of these governance reforms in terms of the complexion of the built environment, rather than focussing exclusively on governance processes.

NPO 93 states that

The Metropolitan Area Strategic Plans, shall include provision for large-scale Transport Orientated Development (TOD) opportunities and may target a proportion of planned growth in the metropolitan areas towards the delivery of new sustainable communities at brownfield and greenfield locations in the principal city and suburbs areas and in the wider metropolitan areas focused on opportunities arising from existing and planned major public transport investment, along planned high capacity public transport corridors and in accordance with the principles of Transport Orientated Development.

The Draft goes on to state that

Responsibility for the integration of land use and transportation outside of central Government, is a joint responsibility of planning authorities, the NTA and other government agencies

But the Draft does not clarify how this responsibility should work in practice. It does not outline a formalised relationship between the NTA and bodies responsible for housing, such as DHPLG; and it does not state how this joint responsibility is to be operationalised in order to deliver Transport Orientated Development. This is surely within the remit of the Draft, particularly chapter 10, which focusses on implementing the NPF. As per our observations on TOD in chapter 2, we urge the authors to formalise this joint responsibility, and to clarify the specific responsibility, and targets that fall under the remit of each of the relevant bodies.

NPO 95 raises similar questions:

The Government will work to establish the necessary institutional and funding arrangements to support the development and accelerated delivery of Transport Orientated Development at suitable locations in conjunction with the ongoing programme of investment in the public transport network.

What are these 'necessary institutional and funding arrangements' and how will they work? The Draft should give this detail and consult on a number of potential options for these arrangements. It is simply not sufficient to say the necessary arrangements will be established in a consultation exercise, as stakeholders do not know what the details are and therefore cannot give a substantial view on their content.

The Draft states that

'The core strategy reforms have realised major benefits and support a more evidence-based and strategic approach to planning'

The Draft should supply data and evidence to back this up. For example, what is the quantum of housing that, since the publication of the 2018 NPF, has been delivered according to the principle of compact growth? Based on our observations and evidence provided in chapters 2 and 5 regarding compact growth and one off housing, we would question this statement.

Similarly the Draft states that

‘Effective implementation will require substantially better linkage between zoning of land and the availability of infrastructure. The Residential Zoned Land Tax and the introduction of Land Value Sharing proposals will assist in incentivising the development of such zoned land in urban areas and ensuring that the necessary infrastructure is in place to facilitate development’.

without giving detail on the mechanism whereby this will achieve the desired outcome of creating a pipeline of land serviced for housing. Again, the Draft should give detail on how the tax and land value sharing will work in practice and consult on this detail.

We commend NPO 99:

When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development.

We have serious concerns about NPO 100, which does serve the purpose of illustrating how light on detail and process the Draft is:

Planning authorities will use compulsory purchase powers to facilitate the delivery of enabling infrastructure to prioritised zoned lands, to accommodate planned growth

CPO is an incredibly complex and costly legal process, which few Local Planning Authorities (LPAs) have sufficient resource to carry out. Again, it is simply not sufficient for the Draft to state that LPAs ‘will use compulsory purchase’ without outlining the details of how this will happen. Is there an accompanying resourcing plan for local authorities to allow them to develop the human and financial resources to engage in CPOs on a regular basis? Or are they expected to do so with existing resources? Have the Law Commission been consulted on the practicality of this suggestion?

An exemplar of how CPO can work where resourced can be found in Birmingham City Council.

Birmingham’s CPO team have garnered such a reputation for effective land acquisition that they rarely end up pursuing a full CPO process, as the threat of a successful CPO is enough to bring landowners to the negotiating table. Since 2010 when the CPO team was created, agreement has been reached without recourse to using compulsory purchase in 90% of cases. Frustrated at the slow pace of delivery, the Council’s creation of a dedicated CPO team is the result of their having clear data on unused and inefficiently used sites, and a cross party consensus among councillors that the private sector was not delivering quickly enough. The policy lesson to draw from Birmingham is less to do with reforming the CPO process itself – although that would be welcome – and more to do with the impact adequately resourced local authorities that can build proficient teams to deal with specific challenges in the housebuilding process can have. We urge the authors of the Draft to give more detail on the process whereby LPAs in Ireland can be resourced to carry out CPO effectively. We welcome the inclusion of a chapter focussed on ‘Implementing the National Planning Framework’. Given the aspirations in the Draft, we agree that it is crucial to its success that a concrete plan for its implementation is included.

However, we have reservations as to whether the implementation actions outlined in chapter 10 are sufficient to ensure that the principles in the Draft are successfully implemented. Below we respond to some of the plans outlined in chapter 10 of the Draft.

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Through its work in this area since its establishment in 2019, the Office has enhanced the quality of the statutory development plan-making process nationally by ensuring that planning authorities apply consistent and best practice approaches to the development of their areas while also working towards the achievement of broader regional and national policy objectives.

The OPR may well have enhanced the quality of the plan making process, but the question then arises: what about the outcomes of the plan making process? As discussed elsewhere in our response, Ireland is continuing its trend towards peripheral development, alongside [high levels of dereliction in our towns and cities](#). The Draft should take the opportunity to measure the outcomes of these governance reforms in terms of the complexion of the built environment, rather than focussing exclusively on governance processes.

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CPO is an incredibly complex and costly legal process, which few Local Planning Authorities (LPAs) have sufficient resource to carry out. Again, it is simply not sufficient for the Draft to state that LPAs ‘will use compulsory purchase’ without outlining the details of how this will happen. Is there an accompanying resourcing plan for local authorities to allow them to develop the human and financial resources to engage in CPOs on a regular basis? Or are they expected to do so with existing resources? Have the Law Commission been consulted on the practicality of this suggestion?

An exemplar of how CPO can work where resourced can be found [in Birmingham City Council](#).

Birmingham’s CPO team have garnered such a reputation for effective land acquisition that they rarely end up pursuing a full CPO process, as the threat of a successful CPO is enough to bring landowners to the negotiating table. Since 2010 when the CPO team was created, agreement has been reached without recourse to using compulsory purchase in 90% of cases. Frustrated at the slow pace of delivery, the Council’s creation of a dedicated CPO team is the result of their having

clear data on unused and inefficiently used sites, and a cross party consensus among councillors that the private sector was not delivering quickly enough. The policy lesson to draw from Birmingham is less to do with reforming the CPO process itself – although that would be welcome – and more to do with the impact adequately resourced local authorities that can build proficient teams to deal with specific challenges in the housebuilding process can have. We urge the authors of the Draft to give more detail on the process whereby LPAs in Ireland can be resourced to carry out CPO effectively.