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PLANNING & DEVELOPMENT CONSULTANTS

Co. Dublin

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**First Revision to the  
National Planning Framework Consultation,**  
Department of Housing, Local Government and Heritage,  
Custom House,  
Dublin 1,  
D01 W6X0

12<sup>th</sup> September 2024

**SUBMISSION ON THE FIRST REVISION TO  
THE NATIONAL PLANNING FRAMEWORK CONSULTATION**  
**On Behalf of Real Estate Acquisitions and Sales  
Limited (REAS)**

Dear Sir/Madam,

We, Brock McClure Planning & Development Consultants, 63 York Road, Dun Laoghaire, Co. Dublin are instructed by **Real Estate Acquisitions and Sales Limited (REAS), 20 Molesworth Street, Dublin 2, D02 T250** make this submission on the First Revision to The National Planning Framework Public Consultation.

This submission is lodged within the deadline of **5pm Thursday 12<sup>th</sup> September 2024**.

We trust that due consideration will be given to this submission in finalising the First Revision to the National Planning Framework.

**BACKGROUND TO THIS SUBMISSION**

REAS are one of Ireland's upcoming residential developers. Their objective is to acquire residential property sites for new build developments and deliver affordable homes to Approved Housing Bodies. Their portfolio extends throughout Dublin City and is also wide reaching in terms of the demographic for affordable homes in this region. REAS have catered specifically for the ageing population in their delivery of housing and have been faced with some challenges in the delivery of a tailored housing product for older people.

It is submitted by REAS that at a national level, there is a lack of consistency in the local planning and policy context to expressly provide for this type of housing option, with Development Plans at variance in terms of policy making and an appropriate use class identified for various zonings. Whilst it is acknowledged that each Development Plan must be tailor made for its appropriate administrative boundary, there is a clear gap in the housing option offer for independent living for our ageing population across all Development Plans.

There is a requirement for a national shift in the delivery of housing options that is bespoke to the ageing community. The market requires the delivery of a smaller unit, and one which is universally designed and located in a safe and secure community type development.



It is fundamental that the national planning policy context addresses this with clear National Policy Objectives included in any final First Revision of the National Planning Framework.

The opportunity currently afforded by the First Revision of the National Planning Framework provides an opportunity to ‘bridge the gap’ and ensure that our ageing population is catered for into the future. Likewise, the opportunity afforded to policy makers to deliver on real and deliverable policy is also considered opportune with the publication of ‘*Housing Options for Our Ageing Population: Policy Statement*’ in 2019 and ‘*Housing for All*’ in 2021, the provisions of which are further examined below. These documents were published after the National Planning Framework first came forward in 2018 and as such, the clear policy intent, objectives and actions set by these documents must be at the forefront of our national planning framework for policy making.

## THE POLICY CONTEXT FOR THE AGEING POPULATION

### **Housing Options for our Ageing Population: Policy Statement (2019)**

We refer to the Governments 2019 publication ‘*Housing Options for Our Ageing Population: Policy Statement*’. The purpose of this document is to provide a policy framework to support our ageing population in a way that will increase the accommodation options available to our over 65 demographic and give meaningful choice in how and where people choose to live as they age. This policy document acknowledges that Ireland’s population is living longer than ever before, and our older population is consistently growing in size. However, it also states that we need to be aware of the challenges this change will bring over the coming years. There is now an obligation to future proof Ireland so that we have a sustainable range of housing options to meet the needs of the rising ageing population nationally.

The document further outlines 6 key principles to inform strategic thinking and practical planning in developing housing options and supports for older people. 3 notable principles include ‘*ageing in place*’, ‘*promoting sustainable lifetime housing*’ and ‘*staying locally connected*’. These principles fundamentally emphasise the requirement for a housing option to deliver on adaptable homes in the local community for older people. The ‘actions’ identified in this document are also of note. Action 1.1. specifically outlines that there must be a “*catalogue of housing options that provide a range of choice that meets the diverse need of an ageing population, spanning owner occupier, private rental and social housing...*”.

In short, there is a very clear message in this policy statement to deliver on a catalogue of housing options for our ageing population and this must be given further consideration in our National Planning Framework.

### **Housing for All (2021)**

Housing for All was published in 2021 and clearly sets out that it is imperative that we plan for our ageing population. Housing Policy Objective 6 of this document seeks to ‘*Increase and improve housing options for Older People*’ and sets out a range of objectives to do this. Associated Objective 6.2 specifically requires that Local Authority Housing Delivery Action Plans will set out how dedicated social housing provision appropriate to the needs of older people will be delivered matching the scale and extent of housing need for older people. Furthermore, Objective 6.3 specifically identifies a requirement for Local Authorities to consider the housing needs to older people through the Housing Need and Demand Assessment Frameworks and feed that into their Housing Strategies as part of the Development Plan process.

This is all welcomed but the document does not go far enough in policy making terms in setting out how we can address this matter in the local planning context and particularly in the development management. There is a clear gap here that must be addressed by our National Planning Framework.

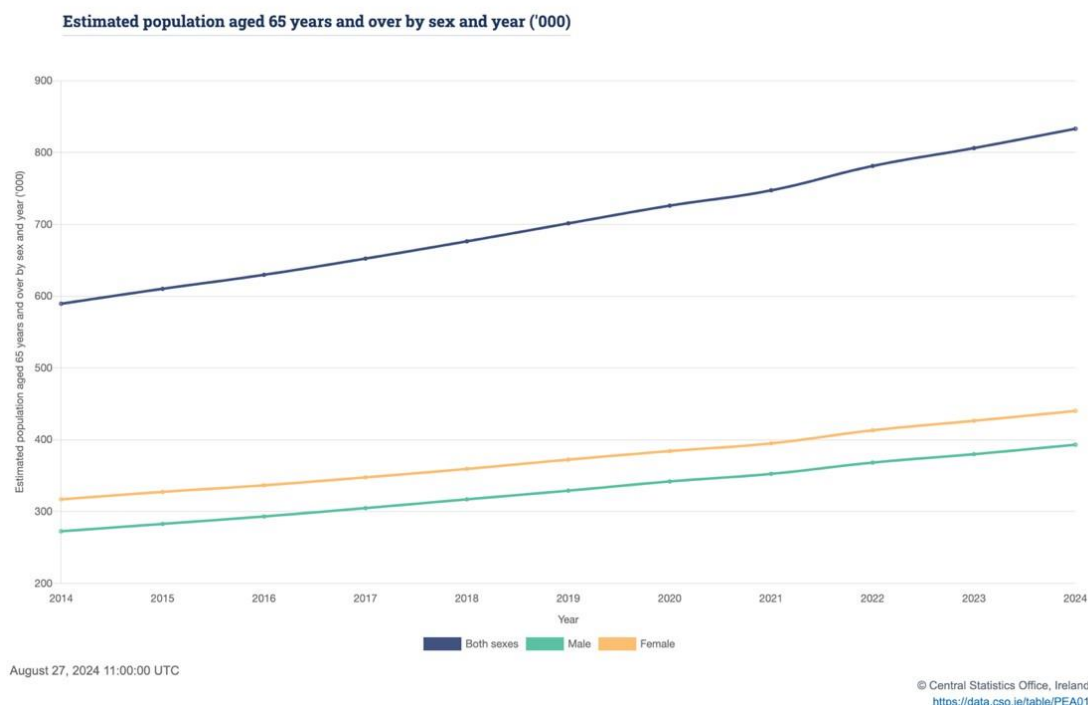




## DATA FOR THE AGEING POPULATION

### Census 2022

Census 2022 data published has outlined that there has been a steady increase in our ageing population since 2014. Figure 1 below outlines this trend. Furthermore, it has been identified that there were 833,200 persons nationally over the age of 65 in 2022 with this projected to be in the region of 915,800 persons over the age of 65 nationally in 2027. This is expected to double to 1,879,400 by 2057.



Evidently, there is a huge increase expected in the over 65 demographic over the coming years and the National Planning Framework must include clear, targeted and specific policy to address this.

### ESRI July 2024

The publication of the ESRI document '*Population Projections, The Flow of New Households and Structural Housing Demand*' in July 2024 further confirms that Ireland is experiencing an ageing population.

On the whole, the baseline scenario (as defined in Section 3.1 of the report<sup>1</sup>), outlines that the population is expected to increase by 922k between 2022 and 2040 resulting in a total population of over 6.1million people by the end of the period. Notably, the report identified that in 2022, 15% of the population was over the age of 65 and that this rises to 21% of the population by 2040. The document points out that at the same time, the share of the population aged 15-64, falls from 65% in 2022 to 63% by 2040. Over this period, the share of children below the age of 15 will also decline from 20% to 16%.

What is clear and confirmed by this publication, is that we are now faced with an ageing population nationally, which the planning system will need to address through the appropriate housing provision and associated services.

## REAS COMMENTS ON THE FIRST REVISION OF THE NATIONAL PLANNING FRAMEWORK

REAS welcome the publication of the First Revision to the National Planning Framework. As set out above, this publication comes at a time where we have clear data to hand in the form of Census 2022 and the ESRI publication in July 2024 *Population Projections, The Flow of New Households and Structural Housing Demand*'. There are also clear policy documents that have been prepared since the first National Planning Framework was published in 2018, namely '*Housing Options for Our Ageing Population: Policy Statement*' and *Housing for*

<sup>1</sup> Baseline scenario: net immigration of +35k p.a. to 2030 (higher in the next two years) and +20k p.a. thereafter. This is based on projections from the ESRI's macroeconomic model COSMO and is consistent with expected economic conditions domestically and internationally.





All in 2021, which must be considered during the public consultation period for the first revision of the National Planning Framework.

Chapter 6 of the document is of particular note and Section 6.4 specifically, which deals with Age Friendly Communities. A review of the provisions in this section confirm that there is acknowledgement given to the fact that we are experiencing an ageing population and that there is an implication for ‘services and facilities’ required to facilitate this demographic. The text also notes that as more people live longer lives, they will

want to stay healthy and independent, and live in their own homes and communities. It is further stated that it is government policy to support older people to live with dignity and independence in their own homes and communities for as long as possible. This is all welcomed.

However, it is our view that the National Planning Objective prepared to support this provision, namely NPO 41, simply doesn’t go far enough to support or encourage the delivery of a clear housing option for independent living for the ageing population at the regional and local level.

As things stand, NPO 30 of the existing NPF published in 2018 is as follows:

**NPO 30 - “Local planning, housing, transport/accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans.”** Proposed NPO 41 by comparison sets out the following:

***NPO 41 – “Local planning, housing, health facilities and services, transport/ accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans.”***

Evidently, there is little change applied to the policy update with limited ‘new’ referencing to ‘health facilities and services’ only. The policy itself remains generic and in effect fails to address the clear policy mandate put forward by ‘Housing Options for Our Ageing Population: Policy Statement’ to deliver on housing choice for the ageing population.

The opportunity and importance of policy making at the national level in this particular context should not be underestimated. Policy must be specific with clear guidance given that it is a national priority to deliver on an appropriate housing option for older people. Section 6.4 and NPO41 currently fail to deliver on this and measures must be taken to address this in the final revision document.

## OBJECTIVE OF THIS SUBMISSION

As part of the current Revision to the National Planning Framework, there must be real change and a fundamental shift in our national policy to recognise:

- The publications of ‘Housing Options for Our Ageing Population: Policy Statement’ and ‘Housing for All; and -
- The release of data by Census from 2022 and the ESRI in July 2024.

It is simply not acceptable that policy has not advanced between the periods 2018 where the initial National Planning Framework was published (NPO 30 refers) to that of 2024, where the First Revision to the National Planning Framework has been published (NPO 41 refers). Policy making at the national level must address the crisis we are faced with in terms of an ageing population and it must recognise the factual data and statistics produced by Census 2022 and the ESRI in July of this year.

There is now a fundamental requirement for the planning system to cater for our ageing population through new housing provisions and associated services and this must start at the national level.

## REQUEST FOR A NEW NATIONAL POLICY OBJECTIVE

It is a request of this submission that a new National Policy Objective be included in the First Revision of the National Planning Framework as follows:

**“Local housing policy, land use zonings and use classes should support older people and provide for a defined housing option which encourages attractive, accessible, universally designed and safe age friendly communities and independent living for older people.”**





It is hoped that the inclusion of such a policy at a national level will in turn see a real shift in policy making at a regional and indeed a local level by way of future revisions to the Regional Spatial and Economic Strategies and Local Development Plans. There must be consistency at the local level in terms of an appropriate housing option for our ageing population and this should be guided by the National Planning Framework.

We confirm that we act for REAS and request that all future correspondence in relation to this matter be directed to this office. If you have any queries please contact me directly.

Yours sincerely,

**Linda McEllin**

[Redacted personal  
information]

