### 1.1 Population Forecasts & Projecting Housing Demand

Part 2.9.5 of the Core Strategy seeks to project Housing Demand for Ashbourne amongst other settlements up to 2026. Table 2.11 of the Core Strategy (extract below) sets out population projections based on the National Planning Framework (NPF) projections. 'Column C' projects a population increase of 3,200 persons for Ashbourne between 2016 and 2026<sup>1</sup>, resulting in a projected population of 15,879 (Column D) persons in 2026 who will need homes within the Ashbourne environs before the end of the plan period.

The use of the NPF projections in estimating future population forecasts for Meath (and subsequently Ashbourne) results in a key issue, as the NPF and RSES uses an overly conservative growth scenario that does not account for the more recent levels of inmigration that have been well documented in the country from 2017-2019.

The Draft Development Plan has acknowledged this issue<sup>2</sup>, referring to more recent data published by the CSO and ESRI that supports the concerns regarding this discrepancy. As a result, the Development Plan appears to justify the use of the additional headroom<sup>3</sup> for population projections as provided for within the NPF Roadmap. This results in a population projection in Meath of 227,500 in 2026 or an annual average increase of 3,246 persons over the ten-year period.

	Census 2011	Census 2016	Projected population 2026	Projected population 2031 <sup>20</sup>
Meath	184,135	195,044	221,250-227,500	225,500- 231,500

Table 3.1 Extract Core Strategy Table 2.6, Population projection for Meath to 2026 including headroom edited/cropped by TPA.

Whilst the application of the additional headroom is welcomed, it is considered that the use of this headroom is warranted regardless of the county's population increasing at a faster rate than anticipated in the NPF. The headroom is required in any event to provide market flexibility and provide for an excess of zoned land.

Whilst the additional headroom has been applied, it is considered that the baseline assumptions within the NPF and RSES strategies continue to under account for the level growth, which is going to occur, resulting in an under estimation of the required Household Allocation for the life of the Development Plan. It cannot be assumed that the application of the headroom will account for this under estimation. As a result, there will a significant shortage of homes provided during the life of the plan to cater for the growing population.

<sup>&</sup>lt;sup>1</sup> Being only 15.7% of the overall population increase for the County over that time period.

<sup>&</sup>lt;sup>2</sup> Draft Development Plan, page 31 – 'Taking account of the recent pattern of population growth in Meath it would be prudent to utilise this additional headroom available in order to provide flexibility in a scenario where population growth would be higher than that projected. This is particularly relevant when consideration is given to the level of immigration presently being experienced in comparison to that projected in the research and projections that informed the National Planning Framework. This Research Paper projected an average net-immigration of 8,000 persons per year between 2017-2021 and 12,500 persons per year from 2021 to 2040. In comparison figures published by the CSO estimate a net immigration of 34,000 persons in 2018 and 33,700 persons in 2019. These figures indicate that the country's population is increasing at a faster rate than anticipated in the NPF.

<sup>&</sup>lt;sup>3</sup> Additional population growth – Refer Page 5 of the NPF Roadmap

We submit that the effect of this underestimation is that the potential (and expected) growth within Meath, has not been adequately captured and therefore all subsequent land use allocation decisions made on the basis of this expected growth will be insufficient to cater for the expanding population.

#### 1.2 Household Allocation

In determining the population distribution and associated household allocation between 2020-2026, the Core strategy identifies that 85.5% of the projected population increase of 32,500 will be accommodated in the Core Area including Ashbourne. This has resulted in a projected increase of 3,200 persons for Ashbourne (Column C) by 2026. These people will need new homes to be completed and occupied by 2026. To cater for this increase in population and reduction in persons per household<sup>4</sup>, Council have provided an estimated household allocation of 1,349 (Column G) from 2020-2026, i.e., an additional 1,349 homes are purported to be provided and occupied over this time (Refer to Table 3.2 below).

Column A	Column B	Column C	Column D	Column E	Column F	Column G	Column H	Column I
Settlement	Population 2016	Projected opulation increase to 2026	Projected population 2026	Approx- imate households completed 2016-2019	Extant units not yet built	Household allocation 2020-2026 <sup>37</sup>	Potential units to be delivered on infill/brown- field lands <sup>38</sup>	Quantum of land zoned for residen- tial use (ha)
Self- Sustaining Growth Town								
Ashbourne	12,679	3,200	15,879	632	209	1,349	351	33.47

Table 3.2 Extract Core Strategy Table, Population, and household distribution to 2026 edited/cropped by TPA.

Column F identifies that 209 extant unbuilt units exist within Ashbourne and includes these units as part of the required household allocation (1,349/Column G) for Ashbourne<sup>5</sup>. It is considered that the inclusion of the full quantum of Extant Unbuilt Units (Column F) in the calculation of household allocation (Column G) is flawed i.e., the Development Plan assumes that all extant unbuilt units will be delivered within the six-year timeframe (2020-2026). It is considered that this approach misinterprets the timing for housing delivery and incorrectly assumes that the number of units permitted will be equal to the number of units delivered. This is discussed in more detail below.

## Difficulties with Extant Units

It is considered unlikely that the full quantum of extant unbuilt units (209) will be delivered within the six-year timeframe, in fact, it is more likely that only a proportion of these homes will actually be delivered within the required timeframe. This is supported by recent analysis by the Dublin Housing Task Force<sup>6</sup> which helps us to understand the conversion rate between extant units and house builds within the local areas of Fingal County Council and South Dublin Council (Refer Table 3.3 and 3.4 below). The resulting analysis identifies that the annual conversion rate for residential units permitted over the last four years was only c. 25% in Fingal and c. 20% in South Dublin.

<sup>&</sup>lt;sup>4</sup> from 3.0pph to 2.5pph as per Council's own calculations

<sup>&</sup>lt;sup>5</sup> As per the draft written statement for Ashbourne

<sup>&</sup>lt;sup>6</sup> Extant permissions in applications of 10 no. units or more, as reported by the Dublin Housing Task Force through annual returns. Source: <a href="https://www.housing.gov.ie/housing/construction-2020-strategy/dublin-housing-supply-task-force/housing-supply-coordination-task">https://www.housing.gov.ie/housing/construction-2020-strategy/dublin-housing-supply-task-force/housing-supply-coordination-task</a>

Table 3.3 – Conversion Rate for Constructed Units – Fingal						
Fingal	Dublin Housing Task Force (DHTF) – Extant Applications for 10+ Units					
	Extant Units	Units Completed to Date	Est. Total Conversion Rate	Units Commenced or Completed Subsequent 12 mo.	Est. Annual Conversion Rate	
Q1.2019	14989	4843	32%	n/a	-	
Q1.2018	17522	4803	27%	4459	25%	
Q1.2017	16237	4467	28%	3574	22%	
Q1.2016	15757	4333	27%	n/a	-	

<sup>\*</sup> Source: Extrapolated from DHTF Returns

Table 3.4 -	Table 3.4 – Conversion Rate for Constructed Units – South Dublin						
South Dublin	Dublin Housing Task Force (DHTF) – Extant Applications for 10+ Units						
Dubiiii	Extant Units	Units Completed to Date	Est. Total Conversion Rate	Units Commenced or Completed Subsequent 12 mo.	Est. Annual Conversion Rate		
Q1.2019	6150	1407	23%	n/a	-		
Q1.2018	6600	1166	18%	1446	22%		
Q1.2017	5366	1640	31%	1001	19%		
Q1.2016	5702	1117	20%	n/a	-		

<sup>\*</sup> Source: Extrapolated from DHTF Returns

These figures strongly support the case that only a proportion of the extant unbuilt units within Ashbourne are likely to be completed within the required timeframe.

However, when looking at historical data presented within the *Draft Meath County Housing Strategy 2020-2026*<sup>7</sup>, it identifies a total of 9,091 permissions granted within the County for housing units between 2013-2019. The housing strategy notes that only 3,865 of these units were completed during this period. It is noted that Ashbourne had a very high conversion rate of 92.7% during this period when compared with a conversion rate of just 42.5% for the county as a whole. (Refer Table 3.5 below). It is likely that the high conversion rate of units is linked to the low number of permitted units, i.e., as the number of permissions increases, the percentage difference between extant and completed units will also increase.

Table 3.5 – Conversion Rate for Constructed Units – Meath & Ashbourne						
Settlement	Draft Meath Housing Strategy 2020 – 2026 Extant Residential Permissions in County Meath between 2013 - 2019					
	Extant Units	Units Completed to Date	Est. Total Conversion Rate			
Meath County	9,091	3,865	41.9%			
Ashbourne	841	780	92.7%			

<sup>\*</sup> Source: Draft Meath Housing Strategy 2020 – 2026

<sup>&</sup>lt;sup>7</sup> Table 3.1 of the Draft Meath County Housing Strategy 2020-2026

Table 3.6 – Conversion Rate for Constructed Units – Meath & Ashbourne						
Settlement	Draft Meath Housing Strategy 2020 – 2026 Extant Residential Permissions in County Meath between 2013 - 2019					
	Extant Units	Approximate number of units built 2013 - 2016	Conversion Rate 2013 - 2016	Approximate number of units built 2016 - 2019	Conversion Rate 2016 - 2026	
Meath County	9,091	452	4.9%	3,413	37.5%	
Ashbourne	841	148	17.6%	632	75.1%	

<sup>\*</sup> Source: Draft Meath Housing Strategy 2020 – 2026

## Conversion of permissions to homes

Notwithstanding the above identified issues with the full inclusion of extant unbuilt permissions in the calculation of household allocation and the use of the NPF population forecasts in determining the required household allocation for Navan, the Development Plan states that population forecasts should only be used as a guide as to the level of growth that can be anticipated during the plan period. Whilst this approach is merited, we suggest that population forecasts should be treated as the minimum level of growth that could be experienced. However, the approach of the development plan is to restrict housing allocation to the minimum that could possibly be required. For example, notwithstanding our concerns referenced above, assuming Ashbourne's population forecast for a population increase of 3,200 persons in 2026 is accurate, a bare minimum additional housing stock of 1,280 units<sup>8</sup> will be required for occupation over the plan period. Generously applying Ashbourne's above referenced conversion rate of 92.7%, would suggest that in order to deliver 1,280 units, a total of 1,381 units will need to be permitted within the plan period. Should sufficient permissions not be achieved it will lead to a severe undersupply of housing to cater for the forecasted population growth.

In order to deliver the required units, the Development Plan has assumed that the zoned land could deliver 1,349 units including 209 extant unbuilt permissions and another 351 units which could be delivered on infill/brownfield lands, resulting in a total of 1,700 units. Generously applying Ashbourne's conversion rate of 92.7% to this number of units would suggest that by 2026, 1,576 units would be delivered. Just meeting the required number of units to cater for the expected population in 2026 and meaning additional residential land will be required by 2026.

We submit that the household allocation and quantum of zoned land must be reviewed to take into account an estimated conversion rate of extant permissions to actual homes during the life of the plan.

# **Quantum of land zoned New Residential**

The Draft Development Plan identifies that 33.47ha of land has been zoned for new residential in Ashbourne. This is required for the delivery of the required housing units over the plan period. Whilst housing units may also be delivered in *'Existing Residential'*, 'Mixed Use' and 'Town Centre' zones, the plan does not appear to contain any direct logic

<sup>&</sup>lt;sup>8</sup> With a household size of 2.5 persons as used by MCC in the Draft Plan

as to how the quantum of 'new residential' use has been qualified nor does the plan indicate if the SDZ otherwise discounted from the household allocation, has been included in this quantum of new residential use.

#### **Summary & Conclusion**

As per the draft Written Statement for Ashbourne, population within the town is expected to increase by 3,200 persons. It is estimated that c. 1,280<sup>9</sup> new homes would be required to cater for this increase in population.

In order to cater for this projected increase, the Draft Plan proports that an estimate of 1,349 new homes will be provided and occupied over the plan period. This number of units would be added to another 351 units which could be delivered on infill/brownfield lands during the plan period, resulting in a total of 1,700 units if 100% of permissions are converted to homes.

Our analysis of Ashbourne's conversion rate of permissions to homes over the previous plan period would suggest that a very maximum of 92.7% of permissions could be converted to homes during the plan period (noting that the conversion rate for the County as a whole was 42.4% during the same period). Therefore, the Draft Plan at a very generous estimate will provide for the delivery of an estimated 1,576<sup>10</sup> residential units by 2026 (296 units in excess of the required minimum). Should Ashbourne's very high conversion rate of Permissions to Homes reduce over the next plan period then there is a risk that not enough homes will be provided. Notwithstanding this, it is evident that by 2026, more land will be required to cater for Ashbourne's growth. As a result, it is imperative that strategically located lands are protected for the future growth requirements of Ashbourne.

<sup>&</sup>lt;sup>9</sup> Assuming 2.5pph as per the Draft Plan

<sup>&</sup>lt;sup>10</sup> Generously assuming a 92.7% conversion rate