

**Michael Moynihan TD**  
**Submission to the National Planning**  
**Framework – Draft Plan**

**National Planning Framework – Draft**  
**Plan**

---



# Submission to the National Planning Framework

## – Draft Plan

---

### Overview

I welcome the opportunity to make a submission to the draft of the National Planning Framework on behalf of my constituents in Cork North-West as well as a national elected representative. While much of this submission draws from the overall national Fianna Fáil paper on the draft plan there are particular issues that I specifically wish to focus on with regard to my own constituency that are relevant to this plan.

Ireland is faced with a series of interconnected challenges that will define the country in the years to come. How we address the impact of climate change and secure an environmentally rich legacy for the future generations who inherit this island is foremost amongst them. Another key concern is ensuring that economic and demographic growth is not tilted towards the East coast at the expense of the rest of the island. Building a country that develops and retains our people equipping them to economically compete in the global world and make a positive contribution. The NPF has a pivotal role to play in meeting those challenges and ensuring that Ireland achieves environmentally sustainable and spatially balanced growth in the coming decades.

Over the next several decades Ireland will reach unprecedented population levels. The ERSI predicts that our population will soar to over 8m people on this island by 2040. This is a unique opportunity for the whole of Ireland to put in place a planning framework that will secure a country where people are happy to live, work, study, receive good public services, play and raise a family.

Long term planning and investment in same is the cornerstone of achieving a sustainable future. Looking beyond short term political demands is crucial to setting

out long term goals and charting a clear route forward. The fundamental challenge of climate change demands strategic planning to ensure we achieve our EU and international obligations, preserving the shared heritage of our environment for future generations.

National strategic planning is a necessity in addressing mounting and evolving demographic pressures on existing physical and social infrastructure. In this context this National Planning Framework (NPF) must occupy a central place in our strategic governance. Housing, water services, the road network, public transport routes, broadband connection, security of energy supplies, the physical framework of healthcare and education provision are critical to how Ireland should look in 2040.

In addition a wider vision of what citizens need to live healthy, fulfilling lives needs to be developed in this NPF beyond just traditional, hard infrastructure. Sport, leisure, recreational facilities and walkways are also critical in creating a country where people can thrive and prosper. Arising from this draft plan Fianna Fáil wishes to highlight a number of issues and build upon the topics raised in our submission to the Issues and Choices phase of the NPF consultation process.

## **Rural Housing**

I am particularly concerned with the potential repercussions of Object 18b of the NPF. The absence of social criteria for the basis for single housing permissions appears to be drawn from the 2013 ECJ Flemish case on rural housing. Given that the department has yet to issue clear guidance on this matter and the 2005 guidelines remain in place this appears to be putting the cart before the horse. The final NPF should provide clarify on the acceptable criteria to be followed in single rural housing applications.

In an area such as Cork North West rural communities are struggling to maintain viability. Increasing restrictions on the capacity of families to remain in the area and builds their own home will only exacerbate this trend. The NPF must not put in place



a regime that penalises local residents with a clear social link to a locality. That link is a crucial part of what infuses villages, towns and townlands across Ireland with their distinctive character and community strength. The use of the definition of economic need must be assessed not just in line with EU law but our broader national objectives.

It is important to recognise that communities are not defined by economic relations alone. Individuals with a clear social or familial link to an area make a rich contribution to the strength and vibrancy of a community. Retaining and enhancing that strength must be a clear goal for the NPF.

That distinctive social infrastructure of rural areas is a solid attraction for families. Unlike in many urban centres the ease of access to pre-existing social networks around sporting, religious or other activities is a key asset for an area. Helping to retain, protect and deepen those networks must be accommodated in any overarching planning framework. The current draft document does not encompass that concern.

The upcoming review of Rural Housing Planning guidelines must not be constrained by what appears to be a severely narrow definition in this draft of the National Planning Framework.

### **Learning from the National Spatial Strategy**

The National Spatial Strategy (NSS) 2002-2020 was the first ever national spatial planning framework in Europe following on from the European Spatial Development Perspective. The NSS was the inaugural regional planning and development framework, put in place by Fianna Fáil government in 2002.

The World Bank, IMF, EC and OECD have all been very complementary of the NSS in various reports, which was used as a blueprint by many other developed nations in drafting their own regional development plans. It was innovative as it set out high



level goals for the long term physical, social and demographic development of the state.

As the draft plan recognises However and disappointingly it was ultimately undermined by a lack of joined up thinking and coherent planning at both governmental and local authority level. The extent to which the strategy was not fully embedded into national as well as local policy is now fully acknowledged.

The economic crisis compounded these fundamental problems, as did the premature abandonment of the Strategy by the 2011-2016 government. However it is misleading to suggest that implementation of the strategy was a complete failure.

The NSS lead to the development of a new evidence base that has gone a long way to enhancing policy and political understanding of the dynamics of local communities, their economies and the conditions that underpin success or stagnation. As a result of the lessons from the original NSS, there is now a clearer understanding of the trends, positive and negative, which influence social and economic characteristics on the Island of Ireland. The strategic thinking in the NSS was driven by the objective of developing the socio-economic 'potential' of areas across different regions.

This was a significant conceptual innovation in the NSS, replacing more traditional methods and locally focused perspectives. We firmly believe that if spatial strategies are to help a region achieve its potential, there is a need to be cognisant and mindful of both historical identities and the reality of how people and communities function.

Undoubtedly, the scrapping of the NNS by Minister Hogan in 2012 was one of the many appalling bad choices made by that government. The decision was especially reprehensible as it was made just as the regional authorities were placed on a stronger statutory platform. This party political decision displayed a complete

disregard for the national planning process and has created a great deal of uncertainty in the regional and local planning process since.

It is vital to the future success of this National Planning Framework that the lessons of the NSS are fully learned from and implemented. Developing a comprehensive holistic approach is key to a NPF that delivers sustainable communities, vibrant economies and attractive quality of life across Ireland. The Draft Plan acknowledges the role of the NSS and the requirement to draw on the lessons learnt from that experience to ensure the NPF has a decisive impact on the ground.

### **National Infrastructure Commission**

Fianna Fáil has proposed that a new National Infrastructure Commission tasked with planning ahead over a 25 year period beyond the limited 5 year cycle of current capital plans should be established. This would be set up by reforming Transport Infrastructure Ireland and drawing from the Department of Transport, National Transport Authority, Sustainable Energy Authority and Local Authorities and it should set out a new framework for the development of transport in Ireland over the coming years. The commission should be tasked with overseeing long term plans for a series of targets.

- Achieving 4% of GDP Infrastructure Investment
- Decarbonising Ireland
- A strong transport network that balances regional development
- Making Ireland an IT nation with telecommunications connectivity
- A secure, balanced energy mix

In our view the work of the Commission should adhere fully to the objectives and targets set out by the National Planning framework and share the same time frame space.

The Commission's reports should be laid before the Oireachtas and subject to scrutiny. Government departments will be required to draw up plans based on the Commission's recommendations as passed by the Oireachtas.

The Draft plan makes no reference to such an idea and refers only to the ten year national development plan which is due to be launched in December. We believe this must be reviewed when the final plan is published.

### **Balanced Regional Development**

The NPF must take a balanced regional perspective on the future development of the country. This means developing economic counter weights to the increasing dominance of Dublin. The draft plan sets out housing targets with 50% of growth concentrated in five key cities and the remainder in our towns and rural areas. The decision to remove the concept of "Gates and Hubs", which formed an essential component of the NSS, risks the NPF failing to have real clarity in its vision for future growth.

In applied terms the aim of the NPF should be to enable growth across all regions while reducing regional disparities. While there have been criticisms of the concept of 'balanced regional development' as being too diffuse, we believe the concept of reducing regional economic disparities while not hindering across the nation growth is well-defined and measureable. In practice it means achieving growth in all areas, but attempting to reduce the share of national growth concentrated in high growth areas, such as the Greater Dublin Area.

While there has been much debate on regional policy in Ireland about the apparent trade-off between regional equity and national growth it is clear that there is need for both and also that balanced growth will benefit the whole country rather than just concentrating on the Dublin and greater Leinster area.

Given the spatial dispersal of the current population the NPF's emphasis on cities may deter future growth across the country. The Plan cannot be allowed to become a city only focused framework.

While a focus on existing Cities might be a good sound bite to the media, it would leave one third the geographic area of the country with no designated growth clusters.

Fianna Fáil's view is that, in fact, reducing regional disparities would not entail a negative impact on aggregate output in Ireland, or in high growth areas like the Greater Dublin Area (GDA), but would have a positive impact on national growth and make overall growth more sustainable.

We believe – and this is supported by international evidence on regional growth disparities – that at Ireland's high level of development reducing disparities in economic terms should have a positive impact on overall national economic output. This is a powerful argument and should be at the heart of what the National Planning Framework is trying to achieve.

Reducing disparities will also improve economic efficiency and productive in the GDA. Without an effective plan to foster economic growth in other regional cities and towns, the GDA will suffer lost output due to problems of congestion in housing, transport and other areas.

Congestion - in terms of slower, back-logged public transport and traffic jams, for example - is, to a certain extent, a sign that more people have jobs to get to. However, while higher levels of congestion are initially associated with faster growth, above a certain threshold, congestion starts to become a drag on economic activity.



Within Dublin, as employment increases towards the levels last experienced in 2004-2008, we will approach this threshold where traffic congestion will have a substantially negative affect on people's daily lives and on economic movement. After a certain point, traffic congestion also becomes a drag on growth, productivity and job growth.

Physical, social and educational infrastructure should be developed in other key cities to allow them to thrive as engines of growth. Improved and more responsive local governance will also play a key part in fostering growth centres.

In this regard, Fianna Fáil has also proposed a new Directly Elected Mayor model to help provide leadership to these cities. The roll out of Broadband is the key technological development in enabling business in rural Ireland to develop. It is also a socially critical piece of economic infrastructure to connect homes to the country's cultural and social life. This will become ever more important over the timeframe of the NPF. The goals of the NPF must be to ensure that the whole of Ireland benefits from future economic and demographic growth.

An over reliance on Dublin at the expense of the rest of the island is economically, environmentally and socially unsustainable. The NPF must broaden out growth to help build a regionally balance country into the future.

## **Fostering Economic Growth**

The NPF must help encourage further investment in the island from both a Foreign Direct Investment perspective and facilitating the growth and development of indigenous businesses. Linking population growth and infrastructure investment combined with a renewed focus on quality of life will play a critical role in attracting and retaining businesses.

The drivers of growth identified in the economic research literature are innovation, human capital, trade, infrastructure, availability of finance and social capital. Increasingly economic growth depends on development of services and high tech



industry which in turn display a strong tendency to locate in large urban centres providing access to skills support services and appropriate infrastructure.

Therefore, the economic potential of the regions outside of the GDA will depend on their main urban centre's ability to stimulate or attract investment in such activities. This will mean the focal growth centre in each region acting as a gateway through which the region's interactions (including its flows of goods, people, money information etc.) with the other regions and directly with the outside world, are channelled.

By strengthening the links between growth centres in each region and their hinterlands, the aim is to create a set of coherent and sustaining regions with more self-reliant integrated economies where people can find high skill employment and live.

This vision of so-called 'Balanced Polycentric' regional development – involves cities or towns in less developed regions pursuing a more self-reliant development path, rather than as primarily being residential hubs for larger employment centres, such as Dublin.

Economic resilience is fostered by having a diversity of industrial and commercial activities in a particular area, rather than striving for specialisation.

In rural Ireland technological advances will continue to allow more diverse economic activity. Investing in adequate broadband will be critical to keeping rural communities' alive and prospering. While traditional policies aimed at encouraging regional convergence has been to provide 'hard' infrastructure as well as assistance to firms, on their own these policies are unlikely to increase the competitiveness of lagging areas.

To develop high skill employment, in regional growth centres the focus has to be on supporting education, research and on human capital development. The role of Institutes of Technology – and potentially of Technological Universities – in having an enhanced role in their regard should not be underestimated.

We believe that a much grander vision is required for IoTs as regional centres fostering high skilled and applied links with local businesses and FDI firms. These academic institutions should be valued benefits to local industries and the development to regional human capital. It should not be the objective of government policy to remove these venerable local higher education institutions from the regions in which they are embedded. Fianna Fáil believes they developed and allowed to foster because of their contribution to local industry and commerce.

The draft NPF should be revised to expand on the role of IoTs in the target growth cities and regions.

### **Hierarchy of Plans**

The NPF will be a statement of the government's objectives for Ireland's spatial development and it will form the top tier of the planning policy hierarchy.

The hierarchy of plans is the central pillar to uphold the entire planning process. Ensuring that the tread connecting one plan to the other is upheld and fully implemented must be subject to on-going review.

The goals and objectives of the NPF must be clearly understandable so that the tiered plans are cohesive .The legislative powers underpinning this connection must be kept under review to upholds its effectiveness. The Planning and Development (Amendment) Bill 2017 forms part of this but must be continually revised to ensure it is working on the ground. Hierarchical planning from the European Spatial Development Perspective to Local Areas plans must be fully adhered to.

If the future planning framework to deliver on its mandate it will have to be aligned closely with other plans, such as the Capital Plan 2016-2021, as well as various regional transport planning documents, such as the Transport Strategy for the Greater Dublin Area. As of yet, there is no evidence that this will be the case. These plans were unfortunately drafted in virtual isolation of the national planning framework.



The Draft NPF is clear on its status but will require continued vigilance and scrutiny to judge if it is actually working based on up to date information from the CSO. The Plan should be reviewed annually by an Oireachtas committee working in tandem with the Office of the Planning Regulator to measure and assess its success. This can then be used to amend and re-align the plan.

### **Independent Planning Regulator**

The new independent planning regulator must be at the heart of holding the hierarchy of plans to account. Ensuring that each layer of plans is compatible and complementary to the other is fundamental to the overall success of the system.

The regulator, working in conjunction with the Minister, must be adequately resourced to hold the hierarchy in place. The implementation of the NPF should be subjected to on-going parliamentary review and scrutiny including the range of powers and resources at the disposal of the Regulator.

Fianna Fáil has repeatedly requested the implementation of the Mahon recommendations on improving transparency, consistency and good decision-making throughout the planning system. It is vital that we continue to put in place the recommended legal and institutional framework.

We believe that proposals for the new Office of Planning Regulator to oversee and assess decision-making and process in planning authorities strikes an appropriate balance in giving the new Office independence in its role, evaluating local and regional development plans while maintaining some democratic control over the body by the Minister and the Oireachtas.

However, we have a number of concerns about the large omissions in the proposals to reform the planning system in the Planning and Development Amendment Bill 2016, including many of key Mahon recommendations for improving transparency in planning such as the disclosure of political donations by planning applicants and the noting of all submissions by political representatives on planning applications.

We also believe that some of the OPR's functions and powers prescribed by the Bill may not make it an effective overseer of the national planning strategy. It is given no role in overseeing executive transport planning agencies, including the NTA and TII.

Since one of the rationales – given by Mahon – behind establishing the Office of the Planning Regulator (OPR) is achieve greater integration between land use planning, such as local authority zoning decisions, and strategic transport planning; it is disappointing that the new OPR is not given any role in overseeing the development or implementation of plans by the NTA or TII.

There are also some concerns that the limitation of the OPR powers as prescribed in the Bill may make it toothless an anti-corruption watchdog in the planning process. The OPR should be able to prevent planning abuses in real time, and should be given powers to strike down particular planning decisions that it considers to be corrupt or contravening proper planning process.

One of the central functions of the new Planning Regulator will be to ensure a more consistent approach to the handling of planning applications across local authorities.

This is very important to help ensure that there is a relatively consistent approach to planning proposals taken across planning authorities. Consistency in the interpretation of development plan policies is essential if public confidence in the planning system is to be maintained.

It is disappointing that the NPF does not encompass these suggestions. This should be reviewed before the publication of the final plan as a matter of urgency.

## **Whole of Government Approach**

A coherent planning framework has to integrate the various strands of government policy into a coherent whole. This means adapting a whole of government approach rather than a silo driven, fragmented department by department policy.

Capital Plans must adhere to the vision set out by the National Planning Framework to ensure investment is matched up with the designated areas and focus of growth.

Internal Departmental plans must reflect the broader objectives laid out by the NPF.

Alignment of departmental plans to the National Planning Framework is of vital importance to it delivering on the ground.

Fianna Fáil wishes to re-emphasize the importance of aligning the forthcoming National Development Plan with the NPF. Further clarity is needed on the Smart Growth Initiative, its funding sources and the criteria by which it will be selected in line with the NPF.

## **All Island Approach**

Brexit further underlines the importance of developing an all Island approach to long term planning. The island is acutely exposed to the hard edge of Brexit and needs to be able to work together to mitigate its worst ramifications. The NPF must work in tandem with the Regional Development Strategy 2035 which charts out the path forward for Northern Ireland.

Aligning with spatial plans for Northern Ireland and utilising the institutional framework established by the Good Friday Agreement and subsequent documents will be vital to fully leveraging the overall potential for the whole island.

In the context of our vulnerability to Brexit this is more important than ever. The Draft NPF is unclear on this matter and should be further clarified.

### **Addressing Climate Change**

The National Planning Framework is an essential tool in Ireland's efforts to decarbonise and meet our EU and international obligations. It must be a core guiding principle of the NPF in targeting population growth, creating sustainable communities and fostering and encouraging public transport use.

Achieving critical mass in key cities and urban centres, supporting sustainable building practices and maximising the use of public transport are indispensable to that goal and fostering sustainable development in rural Ireland.

The NPF and subsequent plans that flow from it must be focused on tackling this existential challenge.

### **Meeting Housing Demand**

The importance of housing is recognised in the NSS, which reflects the fact that people require housing and so the supply and demand of housing is a key factor in determining settlement patterns. However the strong link between housing costs, incomes and household formation was not adequately recognised. One of the core objectives of the NPF will have to be putting in place limits on sprawl and on the dispersion of settlement patterns around large urban centres.

The degree to which this happens depends crucially on zoning, the incentives to develop brown field sites and other development incentives.

### **Brown field development**

National Housing Strategies should focus on brown field development. For example, the massive unused potential Above the Shop spaces – which exist in huge numbers across Cities and Towns – can be converted for use as housing. The NPF should also involve strategy for encourage more central locating of employment and commerce.



Currently the disjointed approach across government encourages the hollowing out of town centres. For example, commercial rates including the system for valuation has a role in encourage the central location of businesses.

The expected increases in population and subsequent pressure on our infrastructure will be most acutely felt in the area of housing. This will also be exacerbated by the proliferation of household formation. Where people live is one of the most basic of human needs and is an integral part of the quality of their lives.

Targeting population increases into sustainable communities on the basis of plan led as opposed to development led construction will be the single most important outcome of a successful National Planning framework. Balancing the need to focus growth in cities and urban centres to achieve critical mass while ensuring fresh life is breathed into rural Ireland is a major challenge for the plan to confront and address.

Meeting lifecycle requirements from students to the elderly must also be recognised in the plan. Our planning framework must be able to facilitate and people who have and rear active families. A sense of place and belonging is a positive feature of Irish life. It is important that plans work with local identity rather than been seen to impose top down solutions.

The NPFs targets for existing urban footprint development should be reviewed annually in order to assess if it is being effectively pursued on the ground.

## **Transport Planning**

While it is true that both the TII and NTA are bound statutorily to 'have regard' to higher level master plans, such as the National Spatial Strategy (NSS) or Regional Planning guidelines, very often there is lack of coherence or even disagreement – whether it is perceived or real - between Local Authority Development Plans and regional transport strategies developed by the NTA and TII.



While it is acknowledged that public transport, rail in particular, requires critical densities within a short distance of rail lines to operate effectively, there is no recognition within the NTA strategy that rail services can also play a reciprocal purpose in land use policies, by encouraging growth in key population centres. The history of the Irish Railway network is testament to rail services' ability to encourage critical population densities to develop along rail lines.

For the Greater Dublin Area Transport Strategy, for example, local authorities and representatives in Wicklow, Kildare and Meath voiced concerns that the NTA was setting the rules on spatial planning, without due consideration to their regional and county plans.

Since one of the rationales – given by Mahon – behind establishing the OPR is to try to get a better level of integration between land use planning, such as local authority zoning decisions, and strategic transport planning; it is disappointing that the new OPR is not given any role in overseeing the development or implementation of plans by the NTA or TII.

It seems, from the current planning bill before the Oireachtas that the role of the OPR will be to ensure there is coherence/ agreement on the part of county development plans and local area plans with regional transport plans developed by the NTA and TII.

It has to be recognised that bodies such as the NTA or TII, despite having a statutory obligation to comply with the NSS and regional guidelines, may not always make decisions that are consistent with regional planning guidelines. And in addition, there should not be an assumption that it is local authority development plans that are inconsistent with regional plans or national plans.

We believe a better approach would be to give the new Office of Planning Regulator the role as arbitrator between local authorities and bodies such as the NTA or TII, where disagreement arises over draft plans. When a local authority is of the belief that specific decisions by the NTA or TII run contrary to Development Plans, such complaints should be given an airing by the OPR, not simply cast aside.

The final NPF should fully reflect this.

### **Implementation, Measurement and Monitoring**

Key to the success of the National Planning Framework is an effective monitoring and implementation process. This must be founded on full democratic accountability.

A NPF implementation team and Independent Planning Regulator should publish an annual report to be laid before the Oireachtas for review and debate. Empirical measurement and quantification of the benefits of the NPF and its instruments would encourage greater levels of local buy-in and public acceptance to the national plan.

The annual report must be based around objective, verifiable data across the key targets of the plan. Regular engagement with the relevant authorities in Northern Ireland with regard to their implantation of long term planning must also be part of the monitoring and implementation process.

The report should also issues recommendations on outstanding areas or legislative weaknesses that need to be addressed in order to help guide debate around its implementation.

The final NPF should specify these mechanisms of implementation.

## **Conclusion**

The National Planning Framework is central to achieving sustainable development on this island over the next quarter of a century. It is vital that the plan has a whole of government buy in and is fully engaged with by lower tiers of governance. Its on-going review and tweaks to ensure effective implementation on the ground is critical to its delivery.

Otherwise it risks being condemned to gathering dust on the bookshelves as opposed to the core, guiding framework of the physical development of the country.