

Irish Planning Institute Submission on the National Planning Framework

NOVEMBER 2017

For further information please contact:

Irish Planning Institute
Floor 3, The Courtyard
25 Great Strand Street
Dublin 1
E: info@ipi.ie
T: +353 (0)1 8788630

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About the Irish Planning Institute

Founded in 1975, the Irish Planning Institute (IPI) is the all-island professional body representing professional planners engaged in physical and environmental planning in Ireland. The Institute's mission is to advance planning by serving, improving and promoting the planning profession for the benefit of the community and the common good.

The IPI represents c.700 planners from across the public, private, semi-state and academic sectors. Our members work in central government, private practice, agencies, third level institutes, planning authorities in the Republic of Ireland and Northern Ireland, An Bord Pleanála and elsewhere.

It is also affiliated to the umbrella body the European Council of Spatial Planners (ECTP-CEU) and has international links with the Planning Institute of Australia (PIA) and the New Zealand Planning Institute (NZPI) and is a member of the Global Planners Network (GPN).

Introduction

The Irish Planning Institute (IPI) welcomes the opportunity to comment on the Draft National Planning Framework published in September 2017. The IPI has undertaken extensive consultation with its members in relation to the preparation of the National Planning Framework and other strategic issues relating to the planning system. This consultation has included five Policy Forum events; the input of members sitting on the IPI's Special Interest Fora; and the input of the wider membership of the IPI. To date, we have also communicated our members' considerations on the emerging National Planning Framework to the Oireachtas Joint Committee on Housing, Planning and Local Government and to the National Planning Framework Advisory Group.

The IPI welcomes the Government's commitment to the preparation of a National Planning Framework and believes that this work represents a major opportunity to consider, analyse and prepare effective evidence-based policy, which can address many of the fundamental issues, which will affect the future development of this country.

The Institute congratulates the Department for the effort and resources invested in non-statutory consultation, which commenced with the Roadmap (December 2015); and the publication of the detailed issues paper, accompanied by the 2014 report of the National Spatial Strategy (NSS) expert Review Group (February 2017); and is now due to conclude with the consultation on the Draft National Framework Plan.

Summary of Key Points

The Institute made a detailed submission to the pre draft consultation, highlighting key issues which required addressing in the Draft Framework including, amongst others, implementation, strategic objectives, regional development, rural and urban development, housing and marine spatial development.

The Institute welcomes a number of elements of the Draft NPF including:

- National Policy Objective 12, which provides for active land management and increased powers of compulsory purchase in urban areas.
- The creation of a programme, which would facilitate people in building their own homes on appropriate serviced sites acquired and prepared by local authorities in small towns and villages (National Policy Objective 17b).
- The emphasis placed in the NPF on the importance of re-use of the existing building stock (e.g. at National Policy Objective 37).
- The proposals to introduce Metropolitan Area Strategic Plans (MASPs), which straddle jurisdictions, with statutory backing under National Policy Objective 63.
- The new requirement for the application of a standardised, tiered approach to zoned land under National Policy Objective 67.
- National Policy Objective 69, which provides for State-Led strategic land development.

The Institute also believes that a number of issues require further consideration with associated amendments to the NPF prior to its adoption. These include:

Implementation

The Institute acknowledges that considerable progress is made in identifying the weaknesses of the National Spatial Strategy in relation to weak implementation and attempting to remedy those weaknesses. As set out in the IPI's submission of March 2017, it is the Institute's strong contention that:

- (i) Policy set out in the NPF must be evidence-based; and
- (ii) There must be a clear means of implementation for the policy set out within the NPF.

There is considerable reference to the "evidence-base" of the Draft NPF, but the evidence-base is not supplied as part of this consultation. In order to ensure the most effective policy design and response and in light of recent negative media on the reliability and validity of the DHPLG's housing data, it is critically important that the validity data used in formulating the NPF be confirmed.

With regard to the second item, it is of paramount importance that the NPF, representing the top of the planning hierarchy in this country, must be capable of implementation. Given this, it is critical that the NPF must be clear and concise. Actions must be specific and measurable against known benchmarks.

The Draft National Planning Framework lists 70 National Policy Objectives (a number of which are broken up into several objectives). Only a small number of these National Policy Objectives set out clear quantitative targets. All other National Policy Objectives are vague, aspirational in nature or open to numerous interpretations. For these latter objectives, given the level of uncertainty around their meaning, it is difficult to see how local / regional authorities or other bodies will attempt to implement them or how the Office of Planning Regulator will determine whether implementation has occurred or not.

Moreover, it is noted that the monitoring of the implementation of the NPF will be a function of the Office of the Planning Regulator (OPR), although the details of this monitoring (e.g. frequency of reporting; whether reports will be published) are not set out in the document. However, based on the proposed legislation to support the establishment of the OPR, its other functions are in the form of reviewing and monitoring with no statutory means of directing action. The NPF must be stronger on the means of ensuring implementation. It is not clear what actions will be taken if reports prepared by the OPR should express concerns about a lack of implementation. Responsibility for implementation, or, indeed, modification of policies to ensure required outcomes are achieved, and not just monitoring, must be clearly set out.

Spatial Specification

The Draft NPF, while being very explicit in terms of goals for population and jobs distribution across Ireland and policy regarding the way in which the land for housing and employment should be concentrated in a limited number of settlements and in a compact manner, does not include any mapping to illustrate this strategy and it fails to identify spatial implications of policies in terms of broad location. The NPF does not include any maps with corridors or zones that should be reserved for strategic infrastructure. This must be addressed at national level. Given the urgency of the energy challenge, the NPF also should and can identify locations for strategic energy developments.

Policy for pattern of growth

Densification of settlement and the creation of compact settlements, whether at city, town or village level, are important in terms of sustainable development and improving the quality and vitality of urban centres. The Institute strongly supports policies set out in the Draft NPF encouraging sustainable and quality development of brownfield/infill lands in urban areas. With this in mind, the Institute questions the sustainability of National Policy Objective 3a setting out a target of delivering at least 40% of all new homes nationally, within the built-up envelope of existing urban settlements. Given that the Draft National Planning Framework envisages 550,000 new homes, National Policy Objective 3a effectively proposes that the majority of new residential, 330,000 new homes, be built outside the built envelope of our villages, towns and cities in the period up to 2040. Having regard to the significant problems associated with urban sprawl and dispersed settlement patterns, the Institute requests that the basis on which this policy was formulated (and why such a low figure was chosen) should be published as a matter of urgency.

It is unclear why Section 4.5: Open Countryside places such a strong emphasis on housing in rural areas, over and above the emphasis on, for example, agriculture in open countryside. The NPF must be clear in acknowledging that there is potential for housing to conflict with the many roles of rural areas if not managed correctly. The Draft NPF refers to further national guidelines on the issue of rural housing, but it is unclear why criteria for rural housing would not be made explicit in more detail in the NPF. It is noted that the NPF includes a targeted growth rate of 15% for small towns and rural areas. It is queried if it is appropriate to include a target for housing development in the open countryside. There is already a significant housing stock in rural areas. There should be a greater emphasis on re-use and renovation of existing buildings in rural areas in the first instance, taking a similar approach to that of urban renewal initiatives.

General Comments

Further to the Institute's submission of March 2017 made in response to the Issues and Choices consultation paper, the IPI welcomes, in particular, the following elements of the Draft NPF:

- National Policy Objective 12, which provides for active land management and increased powers of compulsory purchase in urban areas. In France, Germany and the Netherlands and in parts of the USA, Australia and New Zealand, local authorities play an active role in land assembly, which is often coupled with Compulsory Purchase powers. Such powers are even more important when lands in central urban areas, in multiple ownership, are to be Masterplanned as part of a comprehensive redevelopment strategy. A central fund would allow Local Authorities to identify vacant or underutilised sites to invest in (whether through compulsory purchase or funding essential infrastructure).
- The creation of a programme which would facilitate people in building their own homes on appropriate serviced sites acquired and prepared by local authorities in small towns and villages (National Policy Objective 17b). This approach could have the dual benefit of helping to direct the building of individual rural houses away from remote and unserviced locations, while simultaneously helping to strengthen and regenerate rural towns and villages.
- The coordination of structures for funding rural development in line with the objectives of the National Planning Framework and other national strategies under National Policy Objective 24. It is critical to the success of Ireland 2040 that plans for the delivery of the NPF be coordinated across all relevant government departments.
- The emphasis placed in the NPF on the importance of re-use of the existing building stock (e.g. at National Policy Objective 37). In order to ensure a sustainable approach to development, to limit sprawl and to avoid unnecessary climate change impacts, it is of critical importance that the NPF emphasise the importance of the use of existing development in meeting the strategic objectives of the Framework.

- The proposals to introduce Metropolitan Area Strategic Plans (MASPs), which straddle jurisdictions, with statutory backing under National Policy Objective 63. This is necessary if the co-ordinated and integrated growth of such towns is to be ensured including the renewal of town centre areas. It is suggested that the Regional Assembly should have a role in the preparation of such plans.
- The new requirement for the application of a standardised, tiered approach to zoned land under National Policy Objective 67, which differentiates between (i) zoned land that is available for development; (ii) zoned land that requires further specified investment in basic infrastructural services for development to be realised; and (iii) zoned land unlikely to be serviced within the life of the relevant plan. This approach will help to direct development to the most appropriate sites; will provide certainty for investors, developers and members of the public; and will help to ensure that spending on infrastructure is prioritised in an efficient manner. The Institute also welcomes the intention that planning authorities will use compulsory purchase powers to facilitate the delivery of enabling infrastructure to prioritised zoned lands, to accommodate planned growth.
- National Policy Objective 69, which provides for State-Led strategic land development. The preparation of Strategic Development and Management Plans as set out in Circular Letter APH 02 / 2017 represents a clear approach to their development. There is merit in extending this approach to all residential zoned lands as a key element of active land management on the part of local authorities.

The Institute sets out a series of brief comments regarding issues, which should be addressed specifically in the forthcoming NPF under the subheadings below.

Implementation

The Institute acknowledges that considerable progress is made in identifying the weaknesses of the National Spatial Strategy in relation to weak implementation and attempting to remedy those weaknesses. In this regard, the Institute welcomes that the NPF will:

- Have statutory backing;
- Be subject to periodic review, based on monitoring by the Office of the Planning Regulator;
- Be supported by the forthcoming National Investment Plan 2018-27, including both the urban and rural Smart Growth initiatives; and
- Be supported by further strengthening of the provisions relating to core strategies in development plans.

As set out in the IPI's submission of March 2017, it is the Institute's strong contention that:

- (iii) Policy set out in the NPF must be evidence-based; and
- (iv) There must be a clear means of implementation for the policy set out within the NPF.

Need for evidence-based policy

There is considerable reference to the “evidence-base” of the Draft NPF, but the evidence-base is not supplied as part of this consultation. In order to ensure the most effective policy design and response and in light of recent negative media on the reliability and validity of the DHPLG’s housing data, it is critically important that the validity data used in formulating the NPF be confirmed. The reliance on the CSO count of vacant homes to justify a 5% reduction by 2040 is a case in point. There is a wide discrepancy between the CSO vacancy data (e.g. showing 2,583 vacant units in Limerick City in April 2016) and the Geodirectory count (e.g. showing 386 vacant postal addresses in Limerick City in Q2 2016) for example and the former CSO count is being used to justify a policy of 5% reduction by 2040. Is this an overestimate, an underestimate or somewhere in between?

The Institute further considers it to be regrettable that neither the population and econometric modelling carried out by the ESRI for the Draft National Planning Framework nor a draft of the National Investment Plan 2018-27 have been published as part of this consultation on the Draft NPF. Spatial planning policy must be integrated with policy for the delivery of key infrastructure. The timelines for capital investment programmes must align with the timelines for delivery of key actions under the NPF. In the absence of access to the evidence basis for the policies within the Draft NPF or an indication of which infrastructure is to be prioritised, it is not possible for members of the public to engage fully and in a meaningful way with the current phase of consultation.

Need for a clear means of implementation

With regard to the second item, it is of paramount importance that the NPF, representing the top of the planning hierarchy in this country, must be capable of implementation. It is vital that it leads the way in representing effective planning policy, which is demonstrably integrated into Government policy and throughout the planning hierarchy, and thus is implemented. As a policy adopted by Government, it must form the means of co-ordinating activity across Government departments, by setting out clear spatial development strategies, which can be used to direct funding for infrastructure and by integrating planning with other considerations such as climate change, rural development, landscape, built, cultural and natural heritage assets, infrastructure (green infrastructure, road, sea, air, cycling, energy, rail) and energy planning. Given this, it is critical that the NPF must be clear and concise. **Actions must be specific and measurable against known benchmarks.**

The Draft National Planning Framework lists 70 National Policy Objectives (a number of which are broken up into several objectives). Only a small number of these National Policy Objectives set out clear quantitative targets (e.g. National Policy Objectives 1, 2, 8, 14 and 36) or administrative and statutory measures to be put in place or enforced (e.g. National Policy Objectives 9a and 9b, 17b, 18a, 19, 24, 38, 39, 40, 42, 63, 64, 66, 67, 68 and 70). All other National Policy Objectives are vague, aspirational in nature or open to numerous interpretations. For these latter objectives, given the level of uncertainty around their meaning, it is difficult to see how local / regional authorities or other bodies will attempt to implement them or how the Office of Planning Regulator

will determine whether implementation has occurred or not. To give a small number of examples:

- What are the key characteristics of an “attractive, liveable, well designed, high quality urban places”, “diverse and integrated communities” and “a high quality of life and well-being” (National Policy Objective 4)? What makes an attractive, liveable place or what markers of a high quality of life could be identified in a quantitative way (e.g. schools, hospitals, area of open space, area of retail space, etc. per head of population) or could be provided as a checklist of items of which a certain proportion are required. Given that the development of “high quality urban places” is a National Policy Objective, it is of concern that design quality, urban design and architecture is not a key theme under the NPF as this has a significant impact on planning development management practice.
- Similarly, having regard to National Policy Objective 5, what criteria should be met when seeking to develop “cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth and investment”?
- With regard to National Policy Objective 7, what is meant exactly by the objective to “strengthen all levels of Ireland’s urban structure”? How will success, or otherwise be measured?
- While the Institute agrees with the need to account for rural housing in core strategies, how should such analysis can be carried out for rural areas as required by National Policy Objective 19? Demand will be greatly influenced by type of rural housing policy in a given Development Plan. Should such policy be formulated to meet ‘need’ in the sense of a calculation arising from existing population and future population which could give rise to even greater levels of unsustainable housing or should criteria based policy be established first with an estimated demand based on this?
- National Policy Objective 23 states that it is an objective to “facilitate the development of a National Greenways/Blueways Strategy which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level”. Who is going to implement this policy / how will it be delivered?
- National Policy Objective 56 provides that it is an objective to “reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives as well as targets for greenhouse gas emissions reductions”. While much consideration is given to the role that the NPF and planning system can play in terms of promoting the broad national policy objectives in the area of climate change adaptation with specific reference being made to the National Mitigation Plan and the National Adaptation Framework in places, there is a lack of clarity in terms of the exact relationship between these strategic policy documents, which needs to be addressed. What are the key/substantive environmental issues that these parallel processes have uncovered? How have Ireland’s greenhouse gas emission targets and impending legislative requirements (such as those European Energy Performance of Buildings Directive Recast) been integrated into strategic planning framework to ensure that the policies set out within the document remain achievable over the life of the document?

- Clear benchmarks should be provided in relation to the environmental objectives set out in Chapter 8 (i.e. in relation to water resources, air quality, noise, landscape, etc.). For example, what constitutes sustainable management of the quality of our water resources? What are unacceptable levels of pollution and what are key goals for air quality?
- In chapter 8, what is the definition of a “suitable location” in the context of the delivery of bioenergy supply, food production, forestry, etc. or an “appropriate location” for renewable energy generation?

In addition to the above, a number of the National Policy Objectives will not be delivered through the traditional land use planning system. In the case of multiple objectives, it is unclear what entity will be responsible for implementing the objective (e.g. National Policy Objective 24 in respect of coordination of funding mechanisms for rural development).

Moreover, it is noted that the monitoring of the implementation of the NPF will be a function of the Office of the Planning Regulator (OPR), although the details of this monitoring (e.g. frequency of reporting; whether reports will be published) are not set out in the document. However, based on the proposed legislation to support the establishment of the OPR, its other functions are in the form of reviewing and monitoring with no statutory means of directing action. The NPF must be stronger on the means of ensuring implementation. It is not clear what actions will be taken if reports prepared by the OPR should express concerns about a lack of implementation. Responsibility for implementation, or, indeed, modification of policies to ensure required outcomes are achieved, and not just monitoring, must be clearly set out.

For example, the approach in terms of (i) population distribution across regions, (ii) then within the regions between settlements and (iii) then within settlements in terms of compact development, is logical and well presented. However, the targets are ambitious. A large question is how this will be implemented. Population targets are included based on assumed growth rates for the four cities outside Dublin of at least double that of Dublin (city and suburbs) (see table 3.1 on p. 47). What will happen to Dublin’s growth if the other cities do not achieve these growth targets? Should the Office of the Planning Regulator in those circumstances recommend to hold back the approval of development plans in the Dublin area that facilitate growth greater than 25% of its population? This is not clear.

Delegation of National Level Spatial Decisions to Regional and Local Level

The centralisation of planning function is fundamentally at odds with the principle of subsidiarity (i.e. that decisions should be made by a competent authority at the most immediate or local level) – this principle is at the core of and underpins the structure of the modern, democratic Irish planning system. With this in mind, the IPI

welcomes the emphasis placed in the Draft NPF on the role of Regional Assemblies and the Regional Spatial and Economic Strategies in delivering the vision of the National Planning Framework, especially in terms of identifying the role of towns and villages in ensuring more balanced and sustainable settlement patterns. The Regional Assemblies cover much larger areas, and are much better resourced with qualified planners than the former regional authorities. There is genuine scope for the RSEs to be as much 'bottom-up' as 'top-down' and, thus, achieve critical buy-in from their constituent planning authorities.

However, the Institute is concerned by the content of Section 2.2 of the Draft NPF, which states:

“In setting targets for future growth, it is a pattern of development that is being targeted, rather than precise numbers. At a national level, location, relative scale and proportionality are more important than a numeric allocation of projected future growth. Targeted numbers will assist in monitoring and assessing performance and will provide an indication of the pace and scale of development.

The targeted approach is recursive, which means that it can be applied repeatedly. This also means that it is fair and allows for local aspiration and ambition. The approach enables flexibility at the regional and local levels of the planning hierarchy and for subsequent evaluation and review.”

Regional and local flexibility must be balanced within the context of national goals. The Draft NPF creates a problematic situation whereby hard decisions regarding national level issues (e.g. such as energy, landscapes and seascapes, green infrastructure, etc.) will be made in the Regional Spatial and Economic Strategies. For example:

- **The document lacks in spatial specification:** The Draft NPF, while very explicit in terms of goals for population and jobs distribution across Ireland and policy regarding the way in which the land for housing and employment should be concentrated in a limited number of settlements and in a compact manner, does not include any maps to illustrate this strategy and it fails to identify the spatial implications of policies in terms of broad location. For example, the identification of four cities outside Dublin for urban growth with no urban settlements above the line Dublin-Galway is an inherent (political) weakness for the Framework, although perhaps justified on planning grounds. The Institute did favour reducing the cities outside Dublin to only one or two with a preference for Limerick/Shannon given its location and infrastructure and land capacity. If Limerick/Shannon was given a key role above the other three cities outside Dublin, it would remove some of the political sensitivity of the 'Dublin-Galway line'. This approach risks creating an Ireland of two halves and is not something that can be addressed at regional level.
- **Strategic Infrastructure Locations:** The Draft NPF does not include any maps with corridors or zones that should be reserved for strategic infrastructure. This must be addressed at national level.

- **Energy:** The Institute suggested in its submission that ...”strong and unambiguous implementation policies in respect of achieving a low carbon society by 2050 must be set out in the NPF.” Chapter 8 deals with these issues but remains quite bland in stating relatively obvious goals and failing in highlighting the need for hard decisions, e.g. in the area of wind energy on land. Little guidance is given where the priorities are in terms of relative contributions of different renewable energies (wind vs solar vs biomass). In order to give support for the renewable energy sectors, the Draft NPF needs to state clearly that it will support the development of national renewable energy resources including wind, solar, hydro and bio-energy to contribute to a national demand. The Draft NPF should set out our current rate of energy imports and intended target for energy import reduction between now and 2040. The Draft NPF needs to give more commitment to Ireland becoming energy self-sustaining by facilitating renewable energy infrastructure and technologies, particularly in areas where resources and infrastructure are available and cost effective. Given the spatial implications and large land takes that flow from some of these sources, the NPF should be more spatially specific. Given the urgency of the energy challenge, the NPF should and can identify locations for strategic energy developments. The NPF must ensure that inconsistent planning for energy on a county-by-county basis, and the resistance that this approach can generate is avoided. This can be assisted by setting out a clear national vision for energy in the NPF.
- **Marine Spatial Planning:** Chapter 6 of the Draft NPF deals with this issue but reference is made to a separate National Maritime Spatial Plan, which has yet to be prepared. It is vital that the National Maritime Spatial Plan is consistent with the policies of the NPF and that consistency is carried through in the hierarchy of plans, from national to local level. As such, these documents should have been integrated or developed simultaneously. A consistent approach is needed to dealing with visual impact of off-shore wind farms, coastal erosion prevention and mitigation, protection of sensitive parts of the coastline, areas where marine infrastructure is likely to have spatial implications for the coastal zone, e.g. landings of cables and pipelines, port development, off-shore oil and gas exploration etc. The NPF can provide such a consistent framework. While Chapter 6 of the Draft NPF sets targets for off shore wind energy, the crucial issue is the balance between on-shore and off-shore and this falls between the stools of chapters 6 and 8. As set out under the bullet point above, given the urgency of the energy challenge, the NPF should and can identify locations of strategic wind resources on a schematic map. This would help planning at regional and county level.
- **Landscape:** As set out in the Institute’s March 2017 submission, careful attention needs to be paid to usage and in sustaining and preserving landscape character as a resource for future generations, particularly in light of trends for dispersed settlement patterns. The NPF provides an opportunity to adopt a strategy for the national landscape, which, together with the National Landscape Strategy and the impending National Landscape Character Assessment, could address, inter alia, National Parks, areas of high scenic amenity, cultural landscapes in need of protection (such as Wild Atlantic Way Discovery Points). Such a strategy could be integrated with an ecological strategy that seeks to maximise the potential of the European designated

sites by linking these sites into a national ecological network. While the Draft NPF sets out that it is appropriate to “conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance”, it is considered that assets of natural and cultural heritage, such as landscapes and historic landscapes, of national importance should be identified in the NPF.

Decisions regarding national level planning policy must be made at national level and included in the National Planning Framework in order to form a basis for meaningful regional planning policy. Cumulative inappropriate decisions at regional/local level can and will mitigate against achievement of national goals.

Policy for Pattern of Growth

Densification of settlement and the creation of compact settlements, whether at city, town or village level, are important in terms of sustainable development and improving the quality and vitality of urban centres. The Institute strongly supports policies set out in the Draft NPF encouraging sustainable and quality development of brownfield/infill lands in urban areas. Attracting people back to urban centres is a key measure to improve the quality of life for those already living in city centres and to improve the vibrancy and attractiveness of the city centre.

With this in mind, the Institute questions the sustainability of National Policy Objective 3a setting out a target of delivering at least 40% of all new homes nationally, within the built-up envelope of existing urban settlements. Given that the Draft National Planning Framework envisages 550,000 new homes, National Policy Objective 3a effectively proposes that the majority of new residential, 330,000 new homes, be built outside the built envelope of our villages, towns and cities in the period up to 2040. Having regard to the significant problems associated with urban sprawl and dispersed settlement patterns, the Institute requests that the basis on which this policy was formulated (and why such a low figure was chosen) should be published as a matter of urgency.

The Institute suggested that a rather radical policy is required on rural one-off housing in the IPI’s previous submission of March 2017. While National Policy Objectives 18a and 18b refer to spatial and need criteria for rural housing, the policies and objectives for rural housing set out in the Draft NPF remain relatively weak and the language used in objectives is permissive. Individual rural housing outside settlements must be restricted, save for critical accommodation (e.g. unless necessary for the operation of a rural located enterprise). A more restrictive policy is necessary for at least three separate reasons: (i) to reduce fossil fuel requirements; (ii) to encourage development of sustainable communities in rural villages and small towns; and (iii) the need to facilitate critical infrastructure (e.g. solar parks and wind farms) to which occupants of individual rural houses in remote locations might object. Many rural enterprises could be run from a house located in the nearby village. Economic need is, therefore, too vague and this represents a missed opportunity to facilitate a national debate.

The Draft NPF refers to further national guidelines on the matter, but it is unclear why clear criteria for rural housing would not be made explicit in more detail in the NPF.

It is noted that the NPF includes a targeted growth rate of 15% for small towns and rural areas. It is queried if it appropriate to include a target for housing development in the open countryside. There is already a significant housing stock in rural areas. There should be a greater emphasis on re-use and renovation of existing buildings in rural areas in the first instance, taking a similar to urban renewal initiatives.

Planning for Diverse Rural Places

The National Planning Framework must set out a more detailed strategy for rural areas if the goals of the Framework are to be achieved. Section 4.1 sets out that “rural areas will have a major role to play in Ireland 2040”. However, Chapter 4 does not describe the actual roles of rural areas. It is acknowledged that today and certainly by 2040, rural settlements will have a very different role than they had, for example 100 years ago (e.g. today rural villages are no longer centres of communication/trade, and may never be again). Bearing this in mind, the NPF must be clearer in defining what the Department envisages the changed role of rural areas by 2040 to be in the context of national planning policy in order enable local and regional authorities to specifically plan for the successful delivery of and protection of these roles.

The key roles of rural areas could be summarised as follows:

- Areas with a clear distinction from urban areas in their character.
- Areas of rural population, rural employment and rural social character.
- Areas of recreation and tourism based on their resources and assets.
- Areas of high environmental quality.
- Areas of agriculture and equine economics.
- Areas that protect against climate change and areas that can adapt to climate change.
- Working areas that can accommodate renewable energy production.
- Areas of water resources.

It is critical that national planning policy is clear on what makes rural areas distinct from urban areas so that this distinctiveness can be appreciated and maintained.

The Draft NPF does not acknowledge the interdependency of rural and urban areas. It is a fact that rural areas will, in the future, be the main sources of renewable energy and clean water required to supply urban areas. However, this is not acknowledged adequately in these sections. The absence of this recognition makes it very difficult for local and regional authorities to prepare, for example, renewable energy strategies. Without a national level leadership to this effect, there will be resistance in planning for energy production over and above the needs of individual rural counties and regions, unless there is a clear national plan and clear pathways of return for local rural areas. It is suggested that a clear policy to support energy production as a viable economic sector for the rural economy be set out, along with commitment to the

appropriate supports to achieve this vision. It is disappointing that, rather than identifying and incorporating the strategic areas for renewables into the NPF, work is being left to the 'Renewable Electricity Policy and Development Framework'. This brings with it risk that energy provision will not be satisfactorily integrated into other spatial policy and will not address the deficit in this area that currently exists. It is also a risk that the policy set out in the NPF will conflict with the strategic areas identified, particularly in respect of rural areas.

It is unclear why Section 4.5: Open Countryside places such a strong emphasis on housing in rural areas, over and above the emphasis on, for example, agriculture in open countryside. The NPF must be clear in acknowledging that there is potential for housing to conflict with the many roles of rural areas if not managed correctly. In this regard, it is unclear why the Draft states in relation to rural housing that "remoter areas should benefit from a more flexible approach, particularly where it helps to sustain fragile communities". It is considered that this is a somewhat simplistic view, and does not in itself address why such communities are fragile or if further dispersed rural housing would assist in strengthening such communities. In the absence of any spatial identification, it also precludes consideration of other relevant issues which would impact upon the desirability for a blanket 'flexible' approach such as energy provision, public transport services, water services. This is also the more important in light of the acknowledgement given to the role of rural areas in energy production in Section 4.6.

While the Institute acknowledges that the protection of rural land for agricultural and forestry activity should be the primary land use management policy for rural areas, it is further acknowledged that the planning system has limited control over these sectors. With that in mind, at a minimum, National Policy Objective 21 must be strengthened with respect to landscape and built heritage and consideration given to how this can be implemented in practice. All of the major tourist strategies in recent years, the Wild Atlantic Way, Ireland's Ancient East, are based on the wealth of historic features and landscapes in Ireland. In addition to their intrinsic value, contribution to our national identity, they are valuable economic resources. It is suggested that this objective is re-worded to state: **"Facilitate the development of the rural economy ... while at the same time ensuring the maintenance, protection and enhancement of the natural landscape and built heritage which are vital to rural tourism"**

Other Issues

- Use of negative language when describing the planning system in a national planning policy document: The Institute notes National Policy Objective 10, which states that "There will be a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate planning standards and achieving targeted growth." The Draft NPF goes on to state:

"Although sometimes necessary to safeguard against poor quality design, planning standards should be flexibly applied in response to well-designed development proposals that can achieve urban infill and brownfield development objectives in settlements of all sizes."

This is in recognition of the fact that many current urban planning standards were devised for application to greenfield development sites and struggle to take account of evolved layers of complexity in existing built-up areas. In particular, general restrictions on building height or universal standards for car parking or garden size may not be applicable in all circumstances in urban areas and should be replaced by performance based criteria appropriate to general location e.g. city/town centre, public transport hub, inner suburban, public transport corridor, outer suburban, town, village etc.”

The Draft NPF also makes numerous references to increasing building heights to achieve the goals of the NPF (e.g. National Policy Objectives 11 and 27).

These statements are deeply troubling as, when read together, the Draft NPF suggests that planning standards are arbitrary, are applied by planning authorities in an unreasoned manner and are a barrier to sustainable development, when the opposite is true. In particular, the implication that restrictions on building heights are impeding development at sustainable densities is inaccurate and grossly misleading (e.g. the high rise but low density tower blocks of Ballymun vs. low rise but very high density areas of Dublin’s Georgian core). These statements should be corrected, reworded and the emphasis changed.

- **Definition of Metropolitan Area:** The NPF states that the definition of the metropolitan area accords with that set out in the NTA ‘Transport Strategy for the Greater Dublin Area’. However that document appears to relate the metropolitan area to that set out in the Regional Planning Guidelines for the Greater Dublin Area 2010-2022. The Department should be satisfied that the definition is still appropriate, particularly given its extensive area and the intention in the NPF to create a more compact urban form.
- **Universal design:** While the Institute supports the intention of National Policy Objective 29 to meet the needs and opportunities of an ageing population, the IPI submits that the focus of the NPF should be on universal design. Policies that promote Universal Access and Design also meet the needs of an ageing population as well as other age cohorts. The work of the National Disability Authority should be brought in as a case study here also.
- **Effective and Efficient Planning For Housing Need – a renewed Housing Strategy:** While local authorities have an understanding of their own housing market, these are researched with differing geographies, timescales and techniques. Analysis of a selection of councils’ published plans, available on their websites, identified considerable variation in the scope of variables assessed in their relevant Housing Strategies. There were also significant differences in the way councils explained how their assessments of future housing need had been determined, how they proposed to support wider objectives, and how these objectives would be delivered. Many local authorities focusing on the provision of social housing rather than affordable and private housing.

In the interests of consistency and the need to ensure an up to date market assessment and forecast, the DHPCLG should issue by way of circular to all local authorities the requirements of a renewed approach to the preparation of a

housing strategy to take cognisance of recent circulars on housing policy (Circular APH 02 / 2017). This is vital in the understanding of particular local housing markets to formulate policy to deliver housing, including affordable housing.

Particularly important housing variables for analysis as part of this Housing Strategy must include:

- Analysis of the Housing market Areas
- Stock and Supply Trends
- Housing Market Dynamics and Signals
- Assessment of Future Housing Need
- Affordable Housing Need
- Requirement for different types of homes
- Requirements for specific groups

A particular weakness of the Housing Strategy is that it is prepared every 6 years in line with the Development Plan and is based on a projection for that period that may not be realistic or relevant in varying market cycles. A review every year in line with an update in the Housing Needs Assessment should be undertaken for accurate and relevant information for policy making. This review requirement should be issued with a revised Circular from the DHPCLG.

The benefit of consistency in plan-making allows a readily available comparison of housing assessments within different local authority jurisdictions.

Conclusion

The Irish Planning Institute appreciates the opportunity to give its views on the Draft National Planning Framework and would welcome the opportunity to meet and discuss the issues outlined above. If the Institute can be of any further assistance, please do not hesitate to contact us.



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