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Chambers Ireland's Submission to the Department of Housing, Planning and Local Government on the Draft National Planning Framework, Ireland 2040

November 2017

Chambers Ireland is the largest business network in the State and represents local chambers of commerce in every major town in Ireland across all economic sectors. As a business representative organisation we have been pleased to have had the opportunity to consult with the Department of Housing, Planning and Local Government on the National Planning Framework over the course of the last year as a member of the National Advisory Group. In addition to this we have made two submissions to the Pre-Draft Consultation. We have actively encouraged our network of local chambers to engage with the National Planning Framework consultation and have facilitated meetings between chamber representatives and planning officials from the Department.

We support the work of the Government and the Department of Housing, Planning and Local Government in setting forward an ambitious spatial plan for Ireland which aims to put the country on the right path for social and economic development to the year 2040. Chambers Ireland welcomes the opportunity to participate in this final consultation process on the draft National Planning Framework, Ireland 2040 (NPF).

In this submission we outline our views on the draft National Planning Framework which was published on September 27th of this year. The first section in this document highlights the proposals in the draft which we support, while the second section highlights the areas where we feel more needs to be delivered in the final version of the NPF.

Chambers Ireland views the National Planning Framework, Ireland 2040 as an opportunity to effectively plan for sustainable development and improved quality of life across the whole country. We are supportive of the strategy to make a significant departure from the planning and development patterns of the past and to introduce a strategic and ambitious national plan for growth linked the National Capital Investment Plan.

Key elements of the Draft National Planning Framework

Chambers Ireland supports the ambition of the Government and the work carried out by the Department of Housing, Planning and Local Government to introduce a spatial strategy for Ireland, which will guide planning decisions and future developments to the year 2040. We recognise that without such a roadmap to guide development, the unsustainable and environmentally detrimental patterns of growth and sprawl are likely to continue. Failure to properly plan for the future economic and demographic growth of Ireland's regions would see all regions denied the opportunity to reach their potential and would see the whole of Ireland suffer as a result.

Chambers Ireland firmly supports the ambitions contained within the draft document to promote a convergence in living standards between places in Ireland and to improve quality of life generally across the country. Higher quality of life and more consistent living standards across each region will enhance Ireland's society and economy, and it is right that this goal should underpin the National Planning Framework and indeed all Government policy.

Chambers Ireland broadly supports the National Planning Framework and we welcome many of the measures included in the draft document. Primarily, we are supportive of the need for such a strategy to guide planning and investment and we take the view that the model which assigns drivers of growth is a positive one, though it will require a change of mind-set and less parochial thinking by both citizens and politicians if it can succeed. The 'cities as drivers of growth' concept has been well evidenced by the Department in the Issues and Choices Paper published earlier in 2017.

We are pleased to see the NPF will be placed on statutory footing and believe that this will be necessary for its proper implementation and to prevent the NPF suffering a fate similar to the National Spatial Strategy before it. In addition to the statutory footing of the NPF, we view the Smart Growth Fund as a positive measure which should encourage the meaningful engagement of stakeholders with the aims and policies outlined in the NPF.

The move towards density in planning for growth is a vital element of the draft NPF and Chambers Ireland welcomes and supports this goal. Increased density in cities, towns and villages enables greater numbers of people to access high quality infrastructure and services. Density reduces the cost of delivery and incentivises continued investment in services and infrastructure by both public and private actors. Patterns of urban sprawl and isolated building are environmentally unsound, contribute to higher infrastructure costs for all, and do little for the social cohesion of communities in regional Ireland. Looking to the future we must be more strategic in planning for growth and it is right that increasing the density of our existing settlements is now a core tenet of planning for the future.

The focus on facilitating brownfield and infill development in Ireland's urban centres is an ambitious goal set out by the NPF and we believe that this will contribute to the enhancement of our cities and urban environments. Vacant sites have been a feature of Ireland's towns, villages and cities for too long now. We must begin to properly utilise the land already available which is located close to services and can be easily connected to existing infrastructure. Increased utilisation of brownfield sites for mixed use purposes in the areas where people already travel to work will contribute to increased quality of life via a reduction in commuting times and reduce the harmful impact of commuting patterns on our environment.

Chambers Ireland has previously welcomed plans to change the requirements on building height and car parking facilities in cities and we are pleased to see this outlined as a policy objective in the draft NPF. Changes to these restrictions will facilitate greater levels of development in existing urban settlements. We must begin to build all of our cities in a way that mitigates the sprawl that has been characteristic of the growth of the Dublin Region. Building upwards, not outwards, will enable vibrant, sustainable cities to grow and thrive.

Policy Recommendations

The proposed policies and strategies outlined above are to be welcomed and while we view the draft NPF as being ambitious in many ways, there are a number of areas where Chambers Ireland believes the draft NPF does not deliver. We have outlined below the areas where we see shortcomings in the draft and we have outlined proposals for inclusion in the final National Planning Framework.

Active Land Management

The draft NPF document outlines active land management and zoning as key policy objectives to ensure the continuous supply of development ready land for urban infill growth. Chambers Ireland supports the increased use of active land management strategies to deliver land for development and we are pleased to see it feature strongly in the draft Plan. An effective proactive land management strategy is essential in ensuring that there is a continuous pipeline of land available to Local Authorities.

As part of the strategy on active land management, the draft outlines that it “would also be desirable to seek to broaden the applicability of compulsory purchase legislation to enable urban development in certain circumstances”.¹ In tandem with an increased emphasis being placed on the compulsory purchase powers of planning authorities there must also be a control introduced on the cost of land to be acquired. Chambers Ireland views the introduction of the new National Planning Framework as a prime opportunity to introduce the now long overdue recommendations contained in the 1974 Kenny Report on Building Land.² In particular the recommendation that land suitable for building may be compulsorily acquired by local authorities for a cost of no more than 25 per cent above its zoned value must form a part of any active land management strategy and a renewed focus on the use of CPOs by planning authorities. The cost of land is a major factor in the ongoing housing crisis and without addressing this issue we will not see a steady supply of affordable homes coming on to the market.

Transport Planning

Chambers Ireland supports increased investment in road networks and we were pleased with the recent announcement on future development of the M20 Cork to Limerick road, which our member chambers successfully made the case for. However road transport alone will not drive the economy forward and will not assist Ireland in reducing carbon emissions. The absence of a strategy for rail transport and the lack of detail on the public transport which will be necessary to reach goals of increased density is an omission in the draft NPF.

¹P.51 Ireland 2040 Our Plan, Draft National Planning Framework, <http://npf.ie/wp-content/uploads/2017/10/Ireland-2040-Our-Plan-Draft-NPF.pdf>

² 1974 Kenny Report on Building Land <https://issuu.com/conormccabe/docs/1974kennyreport>

We would hope to see the final Plan recognise the need for a strategy for the future of the rail network of Ireland. More must be done to support Ireland's rail network and mass transit provision in the cities and regions of Ireland. The strategy of compact growth outlined in the draft NPF will not be achieved unless it is matched with a plan for increased investment and higher quality public transport provision within and between Ireland's urban settlements.

On the subject of transport planning, Policy Objective 66 of the draft NPF outlines that "Statutory arrangements between spatial and transport planning in the Greater Dublin Area will be extended to other cities".³ Chambers Ireland firmly supports the need for enhanced transport planning for the cities outside of Dublin. However we would caution that the coordination and coherence in transport planning between stakeholders in Dublin is not without flaws. The NPF should seek to improve upon the existing coordination between planning bodies and transport authorities within the Dublin Region and should seek to replicate an enhanced model of coordination to Ireland's other cities. The NPF affords us with an opportunity to learn from the experience of the Dublin Region as it has grown and to improve upon existing mechanisms in Dublin and Ireland's other cities as we plan for the Ireland of 2040.

Metropolitan Area Strategic Plans

The draft NPF outlines that "in tandem with and as part of the RSEs process, arrangements will be put in place to enable the preparation of five co-ordinated Metropolitan Area Strategic Plans (MASPs) for the Dublin, Cork, Limerick, Galway and Waterford Metropolitan areas",⁴ however the details of the MASPs and their precise relationship with the Regional Spatial and Economic Strategies (RSEs) remains unclear. Given the emphasis on cities as drivers of growth within their regions which the draft NPF and the Issues and Choices paper before it have highlighted, the importance of the Metropolitan Area Strategic Plans will be a significant factor in the practical application of the Framework. The draft outlines that the MASPs will be provided with statutory underpinning and will serve as twelve year planning and investment strategies for metropolitan areas in a similar manner to the RSEs, however the draft NPF requires greater clarity on how will the relationship between the RSEs and the MASPs is to be managed and by what authority.

With the emphasis of the NPF being on cities as drivers of growth, much of the success of the plan will lie in the development of Ireland's urban areas. In order for this to happen effectively, there is a need for a new mechanism to ensure the coordination and cooperation of different local authorities working on development plans for one city or town. We must ensure that cities are not hindered by the various stakeholders engaged in

³ P.128 Ireland 2040 Our Plan, Draft National Planning Framework, <http://npf.ie/wp-content/uploads/2017/10/Ireland-2040-Our-Plan-Draft-NPF.pdf>

⁴ P.125 Ireland 2040 Our Plan, Draft National Planning Framework, <http://npf.ie/wp-content/uploads/2017/10/Ireland-2040-Our-Plan-Draft-NPF.pdf>

their planning and this will require a model for effective cooperation between local authorities to be identified and implemented as part of the final NPF.

The NPF should deliver a model of coordination which can support regional towns which straddle county borders, as well as cities which span numerous local authorities. Without a model for managing coordination across various local authorities we cannot expect the growth targets and densification strategy for cities and towns to succeed.

Review of the National Planning Framework

The draft NPF outlines that reviews will occur over the period of the plan, but there is no specificity on the timing or frequency of these reviews. Chambers Ireland takes a view that it should be clearly outlined when these reviews and updates will take place. Given the high level nature of the Planning Framework and the subsequent vast number of stakeholders, bodies, departments, strategies and other national plans which it is envisioned will both feed into and follow the Framework, there must be clearly pre-defined dates outlined from the outset on when reviews will take place. This would enable all parties engaged in RSEs, MASPs and all other relevant plans to have input into the review and would allow them to coordinate their own review periods over a complementary timeframe. Without clearly defined review periods there will be no cohesive coordination across all of the bodies and plans which it is hoped will be involved in the implementation of the NPF. Subsequent findings will be limited in their insight as a result if we do not plan to set a clear review timeframe and allow all actors to coordinate their review processes with that of the NPF.

Related to this, it would be wise to schedule the first review of the NPF following the completion of initial Brexit negotiations which should have concluded in Spring 2019. It is unfortunate for Ireland that there is so much uncertainty currently surrounding our future relationship with the United Kingdom. We recognise that it is very difficult to build Brexit into the NPF as it currently stands, given the lack of clarity on what a final Brexit deal will look like. However given the importance of the NPF for planning for Ireland's future out to 2040, we believe that Brexit cannot be ignored. A review of the NPF at a time when we have a clear picture of Ireland's future relationship with the UK and Northern Ireland is absolutely necessary if the NPF is to remain relevant and tackle the major issues facing our economy and society.

National Infrastructure Commission

In addition to the establishment of the Office of the Planning Regulator as outlined in the draft, a National Infrastructure Commission should be established to properly and strategically manage investment decisions in infrastructure.

The National Planning Framework is an opportunity to introduce a sea-change in how nationally important decisions on investment in infrastructure are made. Along with the proposed establishment of an independent Office for Planning Regulations, which will be

“responsible for monitoring implementation of Ireland 2040”,⁵ Chambers Ireland recommends the establishment of a separate body, a National Infrastructure Commission. This body would act to oversee investment decisions and would introduce the necessary de-politicisation of investment decisions in nationally important infrastructure.

A model similar to that recently established in the UK should be considered for inclusion in the final NPF. The UK’s National Infrastructure Commission (NIC) is an independent body, tasked with improving long-term infrastructure policy making. The NIC assesses the UK’s infrastructure needs every 5 years, looking 30 years ahead across all key sectors. The Government is then obliged to respond to the Commission’s recommendations, either by accepting them or providing viable alternatives. It is this requirement that the Government respond to the NIC’s proposals that gives it meaningful impact and holds Government accountable for decisions on projects of key national importance.

A national infrastructure commission would work to ensure that the strategy laid out in the NPF is realised in all capital plans and that all investment decisions made by Government Departments correspond with the strategy of the Framework.

Northwest & Midlands Ireland

The draft National Planning Framework has identified five cities which Government aims to foster as the primary centres of economic and demographic growth, namely Dublin, Cork, Limerick, Galway and Waterford. The concept of ‘cities as drivers as growth’ outlined in the Issues and Choices Paper⁶ is a well-founded one, and Chambers Ireland supports this as a strategy as one which will deliver benefits to the whole country, not just the named cities. However from a national perspective, the cities which have been identified in the NPF do not include any in the Northwest and Midlands regions. We are concerned that the absence of an identified driver of growth across this geographic area may result in a large portion of Ireland without access to the opportunities and vital services which proximity to an urban centre affords.

A solution to identify a ‘driver of growth’ and the corresponding investment which this would bring in the Northwest region would serve a large geographic area and its population and should be addressed in the final NPF. The National Policy Objective 2 outlined in the draft NPF of “accessibility to the north west of Ireland and between centres of scale separate from Dublin will be improved, focused on cities and larger regionally distributed centres and on key east-west and north-south routes”⁷ is unlikely to be realised in the Capital Plan without identifying a solution to deliver a ‘driver of growth’ for the region.

⁵ P. 9 Ireland 2040 Our Plan, Draft National Planning Framework, <http://nfp.ie/wp-content/uploads/2017/10/Ireland-2040-Our-Plan-Draft-NPF.pdf>

⁶ Ireland 2040, Our Plan, Issues and Choices Paper <http://nfp.ie/wp-content/uploads/2017/02/Position-Paper-Issues-and-Choices-Ireland-2040-web.pdf>

⁷ P. 37 Ireland 2040, Our Plan, Issues and Choices Paper <http://nfp.ie/wp-content/uploads/2017/02/Position-Paper-Issues-and-Choices-Ireland-2040-web.pdf>

Without links to the rest of the country, investment, growth and quality of life in the Northwest and Midlands are unlikely to increase and we may see a further loss of population from a significant geographic area of the country.

Regional key enablers

The five named cities of Dublin, Cork, Limerick, Galway and Waterford have key growth enablers outlined for their cities and regions in the draft NPF. Our member chambers from these regions will likely engage with the Department on the quality and suitability of these key enablers in respect of their own localities.

For the regional towns which are not named, there are no key growth enablers outlined which for implementation at RSEs level. Chambers Ireland recommends that final National Planning Framework contain a list of key enablers of growth which could be adapted to suit towns and settlements outside of the five named cities. Such a list of key growth enablers for regional towns would serve to guide the Regional Spatial and Economic Strategies in planning for investment and growth. Similarly, growth enablers for rural Ireland should form a part of the Framework. The logic would be to encourage the adoption of a number of these policies at RSE level without being overly prescriptive and allowing final decisions on such policies to be taken at regional level.

The current drafting of the Plan offers very little clarity or strategy for locations outside of the five named cities, particularly in the area of economic and enterprise development. While we are aware that the decisions related to the rest of the country will occur at the more devolved RSEs level, the Framework itself should clearly establish a plan for enabling growth in the regions which can be adapted and implemented at the regional levels.

Low Carbon planning for the future of Ireland

There is a lack of ambition in the draft NPF when it comes to putting Ireland on the path to a lower carbon future. While ‘Key Element’ number 4 outlines that the NPF will have “strengthened and more environmentally focussed planning at local level”⁸ we see little detail on this contained within the draft. If Ireland is to make the radical changes needed to tackle climate change and meet our international commitments in this area, then a top-down, detailed plan for management of both the economy and the environment in a way that is sustainable and leads us on the path to a carbon neutral future must be put forward. The draft NPF does not deliver in this regard. As a high level framework which will serve as “the reference point for other actors to adhere to and to follow”,⁹ it is vital that the NPF clearly outlines a strategy which will ensure that other plans and bodies which feed into the overarching Framework are planning for an environmentally sustainable future. Similarly,

⁸ p.40 Ireland 2040 Our Plan, Draft National Planning Framework, <http://npf.ie/wp-content/uploads/2017/10/Ireland-2040-Our-Plan-Draft-NPF.pdf>

⁹ P.28 Ireland 2040 Our Plan, Draft National Planning Framework, <http://npf.ie/wp-content/uploads/2017/10/Ireland-2040-Our-Plan-Draft-NPF.pdf>

the goal for strengthening the circular economy in Ireland is not clearly outlined in any tangible policy objectives in the draft Plan.

We acknowledge that there are many environmental benefits to increasing the density of urban settlements and avoiding sprawl, but this seems to be the primary measure proposed for protecting Ireland's environment and mitigating the effects of climate change. The draft NPF has much rhetoric on the environment, yet there are very few tangible policies other than increasing density, and there is no clear path outlined in the draft on how Ireland can reach a low carbon and environmentally sustainable future through the NPF or through the RSEs. One of the most striking omissions is that the high level goals for the Planning Framework outlined on page 26 of the draft do not contain reference to climate mitigation or reducing carbon emissions in Ireland. The NPF's strategy for increasing the density of existing settlements and the utilisation of brownfield sites are welcome, and will go some way to enhancing the sustainability of Ireland's growth. However it is not enough to solely rely on this strategy alone and the NPF must take a wider view by clearly defining environmentally sustainable goals for all areas of planning, such as energy and transport, in order to strategically and holistically plan a low carbon future for Ireland.

Rural Connectivity

Fast and reliable broadband provision is essential for Irish business to compete and to trade internationally. As it currently stands, businesses in rural Ireland are on the wrong side of the digital divide and this has detrimental effects on both quality of life and economic opportunities for rural dwellers and businesses.

While we support the strategy to focus future planning and growth in increasing the density of existing urban settlements, rural Ireland cannot be left behind when it comes to connectivity. It is vital that the places outside of the five named cities and the centres which are yet to be designated in regional plans are not excluded from the benefits which broadband connectivity bring to a place. Ensuring access for rural communities to high quality broadband must be at the heart of the strategy for smaller communities and will be essential in supporting the continued population of rural Ireland. The delays to the National Broadband Plan have been extremely frustrating for those in areas without adequate provision and the expedited delivery of the Plan remains critical.

Conclusion

Chambers Ireland accepts that “investment cannot effectively occur everywhere” and that “development services must be located where all of Ireland’s people can best be served”,¹⁰ however we are keenly aware that this will require hard choices to be made by planners and politicians. The implementation of the National Planning Framework will require significant political support at all levels.

The Regional Spatial and Economic Strategies and the Metropolitan Area Strategic Plans are where the bulk of the detailed implementation of the NPF will occur and where the difficult decisions will be made via the Regional Assemblies and other bodies. What happens at these levels will be fundamental to the success or failure of the plans. There must be a very clear structure to facilitate, encourage and support collective decision making for these difficult choices on investment and planning at metropolitan, regional and local levels across Ireland.

As outlined above, Chambers Ireland welcomes the statutory footing being given to the NPF and the corresponding RSEs and MASPs. We are aware of some of the opposition currently facing the National Planning Framework and we hope to see this overcome through continuous, meaningful engagement with all relevant stakeholders at local and regional levels.

Many of our affiliated chambers will making their own submissions to the Department of Housing, Planning and Local Government on the draft National Planning Framework for consideration on issues of local , regional and indeed national importance. As an organisation we will endeavour to assist our network in continued participation with their local Regional Spatial and Economic Strategies consultations across the country and we look forward to continued engagement with the Department on the implementation of the National Planning Framework, Ireland 2040.

¹⁰ P.16 Ireland 2040 Our Plan, Draft National Planning Framework, <http://npf.ie/wp-content/uploads/2017/10/Ireland-2040-Our-Plan-Draft-NPF.pdf>