



**RTPI Ireland**

mediation of space · making of place

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Dear Sir/ Madam

## **THE NATIONAL PLANNING FRAMEWORK FOR IRELAND**

RTPI Ireland welcomes the production of the new National Planning Framework (NPF) and is pleased to be part of its Advisory Group. Below are our comments based on the consultation draft NPF.

### **RTPI Ireland**

The Royal Town Planning Institute (RTPI) is the champion of planning and the planning profession. We work to promote the art and science of planning for the public benefit. We have around 300 members in Ireland and a worldwide membership of nearly 23,000. We:

- support policy development to improve approaches to planning for the benefit of the public;
- maintain the professional standards of our members;
- support our members, and therefore the majority of the planning workforce, to have the skills and knowledge they need to deliver planning effectively;
- maintain high standards of planning education;
- develop and promote new thinking, ideas and approaches which can improve planning;
- support our membership to work with others who have a role in developing places
- improve the understanding of planning and the planning system to policy makers, politicians, practitioners and the general public.

### **Principles for the NPF**

RTPI Ireland believes that the National Planning Framework should be a truly ambitious document that establishes key objectives for an all Ireland in the short, medium and long term; and accordingly, outlines a vision for how these will be delivered spatially. The NPF

should be seen as a key opportunity to achieve ambitions in areas such as sustainable development, sustainable economic growth, sensible town planning and in tackling climate change.

Those countries that have successfully planned for sustainable economic growth – such as the Netherlands, Norway and Sweden – have combined an approach that sets priorities and drives action from a national level down along with ‘bottom up’ community engagement and empowerment. They have explicitly embraced national and strategic planning as a mechanism to achieve this. They have used the planning system as a means of demonstrating national leadership through setting out their ambitions for the country and for making often-difficult decisions that can bring short, medium and long-term benefit.

We have already submitted a list of 10 principles for the NPF as part of the consultation process. These are still relevant and say that it should:

- be ambitious.
- prioritise.
- be integrative.
- be influential.
- be clear and holistic.
- focus on delivery.
- focus on outcomes.
- be linked directly linked to other policy, and vice versa.
- be clear on where it links with other policy, guidance, advice and good practice.
- be based on sound evidence and needs to be monitored to ensure it continues to be fit for purpose.

Our comments on the draft NPF are set out below under each of the exaction headings.

## **A New Way Forward**

### **A Corporate Document**

We welcome the commitment to produce a National Planning Framework. We also broadly welcome the content of the consultation draft. RTPI Ireland is of the view that this should be a corporate and influential document in Government that works to encourage collaboration between different functions to support sustainable development, economic growth and social justice. We are pleased, therefore, that there is cross ministerial and departmental support for the document. This must continue throughout the life of the document.

### **A Statutory Document**

RTPI Ireland agrees that the NPF should be a statutory document. We think it should be approved by the Oireachtas. This will not only provide the framework for making decisions on the future development of the country, but also allow for a full debate on this by Parliamentarians and give them ownership of the document.

### **Delivery**

It is essential that the priorities contained in the in the NPF are able to be delivered. Given this, we believe there should be a action plan or programme accompanying the finalised version which clearly sets out the priority tasks, a timetable of activity, who is responsible for what and the resources required to be provided by whom. This should be linked to an investment plan setting out how Government will use its resources to best effect.

### **Outcomes and Goals**

We are of the view that the finalised NPF needs to clearer set out the goals it is trying to achieve and that these should be framed as outcomes. As stated above, RTPI Ireland has already set out 10 outcomes which we think should be the aspirations of the NPF. The vision set out in page 27 of the consultation draft go some way to doing this. There also need to be clarity of the goals and targets and how these should play out in different settings, especially in regional strategies.

### **Format**

RTPI Ireland believes that the finalised NPF should be more map based and spatial in format. It needs to differentiate between what is 'policy' and what is spatial priority as this is not always clear at present. We would like to see more maps and plans showing the different spatial implications of policies for specific geographies. The NPF should also give graphic and plan based interpretations of where growth is promoted, where there should be stability and what should be protected. Such maps should also set out what investment will be put in place to support this, including for infrastructure.

As part of this we wonder if it would be more effective if the NPF clearly set out a small number of key national developments which would be 'game-changing' in supporting the development of the country. These national development would then become priorities for investment and could receive some form of status that gave them traction to support investment and the infrastructure they require.

### **Making Stronger Urban Places**

It is recognised that Ireland's prosperity relies on balanced compact growth based on the principles of sustainability. But all three elements of sustainable development must be pursued.

RTPI Ireland is of the view that the NPF should have at its heart the pursuit of a more compact urban form in our towns and cities. This will involve increasing densities and building heights to develop more consolidated urban places. It should look to reusing vacant and underused part of our settlements thus encouraging brown field site development before greenfield development sites are even considered.

This supports the principles of sustainable development in making best use of land and reusing brownfield. It provides a context for settlement strategies that can help to minimise unneeded car use. It can ensure that we make better use of existing infrastructure.

We support the need to make it easier to use compulsory purchase to help growth in cities. We also welcome the proposal to concentrate new development on urban areas and brownfield and the idea of establishing a National Land Development Agency to help buy land.

### **Dublin**

It is imperative that the investment is made in Dublin as set out in the NPF. It proposes a Metropolitan Area Strategic Plan although there is no indication to which public agency the responsibility for implementation of a Metropolitan Area Strategic Plan will lie. As such, there is concern that the framework of organisational responsibility is not addressed, and the potential implications for local democracy.

We are of the view that the NPF should encourage further growth of Dublin - which now accounts for over 40% of the population - ensuring its position is not hindered as an international competitive economic region. However this needs to be consolidated and utilise all public transport possibilities and advantageous of the area as a whole instead of it being currently being 4 administrative areas abutted by three more. In planning terms, Dublin

should grow out sequentially from the centre, consolidate the gaps and prevent overspill into the bordering counties.

We believe that the NPF should look to maximise the potential of growth in Dublin but ensure that the benefits of this are shared. There is a real need to ensure that growth in Dublin is planned properly to make sure that it is sustainable and supported by the right infrastructure and facilities. This should explore a more integrated approach in Dublin which is cross cutting and which identifies key projects and how they will be funded.

## **Regions**

The basis of the predicted population and employment growth forecasts are based on the work of the ESRI. However, given the past trends in the Census data over the last 20 years and the cyclical nature of economic activity, the forecasts could be seen as being optimistic. Table 2.1 on page 39 is useful in setting proposed development patterns across regions, however, it would be more helpful and realistic if different scenarios were established as context i.e. high growth, no growth, low growth, negative growth? There needs to be clarity in the evidence base used for these projections.

The NPF should learn from the challenges of developing and implementing the National Spatial Strategy. It should promote a regional and strategic approach to planning, where this is required, so that it can identify key opportunities and gaps in existing plans and frameworks. In doing this, the NPF should work with local authorities to assess and identify where there is a critical mass for developments that could be established as “areas of opportunity”. These areas of opportunity may not need to conform to traditional administrative boundaries but be functional areas that bring together those places which would provide most added value if they were to work together. This would allow them to establish priorities and make best use of investment. The NPF should be a document that seeks to facilitate and encourage innovation and creativity in communities, and as such should be a “living” document that does not stifle or inhibit new ideas and emergent trends in, e.g. technology, industry or tourism.

The Role for Planning is key as part of the implementation of the NPF. There is the preparation of Regional Spatial and Economic Strategies which will follow-through to regional and local scale, involving all stakeholders. Key priorities are more comprehensive ‘Core Strategies’ in the statutory Development Plans which prioritised land zoning to include estimate of service cost and are better linked to investment.

## **Planning for Diverse Rural Places**

RTPI Ireland believes that our rural villages and towns can be key drivers of the economy. Given this, the NPF needs to ensure that they are prepared for investment and protected from threats to their viability. This need to recognise that the success of rural villages and towns can rely on their links with other places and on what is happening outside of them. The NPF needs to pursue the social and economic resilience of towns and villages as a key objective rather than unrealistic or overly aspirational plans or policies.

We believe that the NPF must use planning policies to ensure new development looks to support rural villages and towns as the first option for new development and to minimise out of village/ town/ city development rather than greenfield.

The NPF should also look to protect our most valuable landscape, places and buildings in rural Ireland. This will require rigorously applying designations that clearly establish where development can and cannot take place.

As part of this RTPI Ireland advocates that the NPF restricts the development of one-off houses in the countryside. Critical mass should be built into towns, villages and cities. This

should recognise that one off housing can be affordable housing. However, demonstrable economic need is too general a term as it is more affordable for the rural population who own a farm to build a house on a site which forms part of farming land as opposed to building/buying a house on zoned land in a town/city. Given this, anyone could have a demonstrable economic need for this more economically viable option for the house owner which in a sense is affordable housing. The knock on effect in terms of spatial planning is that rural towns and villages are suffering from a lack of new build and investment, with fewer and fewer people choosing to live there.

The Town and Village Renewal Schemes are investing in public realm etc. however without taking a holistic view on sustaining village communities, we are approaching the problem in isolation of what is really happening and where new private housing is locating in rural Ireland.

Isolation of rural communities comes about due to a lack of connectivity and therefore we are pleased to see references in the NPF to broadband in this context. However there is a need for the NPF to examine how it can help support rural lifestyles by strengthening and enhancing tourism, food production, energy, small scale craft engineering and bloodstock. In doing this there is a need to streamline rural funding and investment.

### **People, Homes and Communities**

RTPI Ireland is of the view that the NPF must look to provide a quality home for everyone who needs one. In doing this we believe that the Government must take an active role to tackle homelessness and increase the number of quality homes

The NPF, Regional Strategies and Economic and Community Plans can integrate infrastructure to support existing and new development. Current mechanisms for valuing the costs and benefits of major transport infrastructure projects often fail to capture the true potential effects of such investments. In certain cases land value uplifts offer an untapped potential source of funding that could be used to reduce the public burden of such projects. Such projects should only be planned in conjunction with other key policy priorities, such as large scale housing development and climate change adaptation, so that their business cases are improved and other policy outcomes maximised. If used properly infrastructure can improve liveability through prioritising walking, cycling, public transport and green networks.

The NPF should be ambitious on infrastructure provision and should integrate it to support existing and new development. We believe the NPF must:

- coordinate and influence investment and align budgets for infrastructure to improve liveability, connectivity and the low carbon economy.
- ensure that Irish Water and other utilities are engaged early in the development of the NPF. This will set the context to better align their investment strategies with Regional Strategies and Economic and Community Plans.
- develop and implement innovative funding mechanisms to support infrastructure delivery.
- invest in infrastructure, including green infrastructure that prevents and mitigates flooding.

The NPF should recognise that new infrastructure could be used to 'make the market' and stimulate growth in places where this may be required. Infrastructure should not just focus on roads but look to include other key factor to make places successful such as broadband, public transport and green infrastructure.

## Realising our Island and Marine Potential

It is appropriate that an integrated approach is being taken to regional and local development plans and relevant maritime spatial planning issues. All planning - both land and marine - should be consistent with each other.

## Working with our Neighbours

### Brexit

Given the changing context of planning across boundaries (i.e. the UK's exit from the European Union), this section and emphasis on connectivity is broadly welcomed. It is crucial that the NPF remains flexible to take account of the overall shape and implications of the Brexit process and implementation of Ireland 2040 will be achievable or can be adjusted or reviewed to take Brexit into account. This is of particular importance as Regional Plans are formulated and their more detailed policy objectives

However, it is disappointing that the section has not been prepared and linked to a similar framework for Northern Ireland which could underpin and bolster the policy objectives set out in the section.

RTPI Ireland is of the view that the section is lacking in policy objectives to strengthen links other than to Northern Ireland. As well as working with our closest neighbours on other parts of the UK, there could be a greater emphasis exploration of links to other EU countries such as France in terms of transport, energy, tourism, etc.

### Northern Region

It is noticeable that no city population growth is targeted for the northern region of Ireland despite the fact that this could underpin and bolster the policy objectives set out in the section. For example the cross border city area of Letterkenny/Derry City has not been carried forward from the National Spatial Strategy, despite clear spatial and economic links in this region.

### Espoo Convention

The NPF doesn't place any emphasis on Ireland's commitments under the Espoo Convention to prevent, reduce and control the adverse transboundary impact of certain activities on the environment with a view to ensuring ecologically sound and sustainable development. This is of importance to working with our neighbours in a spatial context and should be highlighted.

## Realising Our Sustainable Future

RTPI Ireland is concerned that the NPF presents no vision or scenario planning for climate change and what Ireland will look like if we are to achieve our European and international obligations on same. It is not clear how can these be achieved and is it compatible with growing the population by one million people?

We feel that it unrealistic to ring fence agriculture so that all future emission reductions will almost exclusively fall on transport and energy.

Also, the Smarter Travel (2009) policy, which targeted reductions in car commuting, is not provided for. Generally the NPF needs to be more specific in promoting a more integrated public transport system and the need to invest more in active travel through creating liveable, walkable places so as to help support climate change, air quality and health objectives.

It is also disappointing that there is little detail, vision or scenario planning to sustainably manage the quality of our water resources to support and deliver the growth strategy for Ireland 2040.

## Implementation

We are of the view that the NPF should have an Action Plan. Key to the success of the NPF is that it delivers change on the ground. Given this RTPI Ireland is of the view that it should have an Action Plan or route map which sets out the key developments it is promoting and:

- Where these will be delivered
- Who leads and contributes in taking forward the development
- Who is responsible for what
- When milestones will take place
- How it will be resourced

This should be reviewed and reported on regularly. The Action Plan/ routemap would help to provide a focus for Government, agencies and private sector investors to have a clear idea of who is responsible for what. It would help to provide a focus for pan-Government discussion on future needs and investments required.

There should be a role for the new Planning Regulator to have responsibility to monitor the implementation of the action plan, to report on progress made and to identify barriers or obstacles that are preventing the delivery of the NPF. We think that it is important that a NPF Monitoring Report is published annually/ bi-annually to assess progress being made. This could ensure that the NPF is on the right track, or, if it is not having the impact expected, lead to discussion on what needs to be done to change that. We believe that the Monitoring Report should be presented to the Oireachtas.

## Contact

I trust that you find these comments useful. Our Director, Craig McLaren, can be contacted on 08925 15649 or [contact@rtpiireland.com](mailto:contact@rtpiireland.com) to discuss the points raised in our letter further.

Yours sincerely

*John Downey*

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