

Irish Planning Institute Submission on the National Planning Framework

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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 first stage of the process for drafting a National Planning Framework, the Issues and Choices Paper, published in February 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 preparation of the 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 has moved on to the next phase with the subject of this consultation, the publication of the detailed issues paper, accompanied by the report of the National Spatial Strategy (NSS) Expert Review Group (2014). In particular, it is encouraging to note how many of the latter's recommendations have been followed through in the issues paper.

The emerging National Planning Framework presents a unique and exciting opportunity to shape our future and to plan in a sustainable way for the next 20 years. It is critical that the Framework will be supported by a strong evidence base, which must take account of the results of the most recent Census results. In this regard, the Institute welcomes the reference in the Issues and Choices document to a wide range of sources of evidence on which the National Planning Framework will be based, including research carried out by the All-Island Research Observatory.

Below, the Institute sets out a series of comments regarding issues which should be addressed specifically in the forthcoming NPF.

Implementation

The publication of the National Spatial Strategy was a notable feature of the planning system in Ireland by virtue of representing the first attempt at a national planning policy. Important lessons for planning in Ireland have been gained from the experience of the National Spatial Strategy. Two of these have particular relevance for the National Planning Framework: (i) Policy must be evidence-based; and (ii) there must be a clear means of implementation. For much of the lifetime of the planning system in Ireland, the focus has been on development control, latterly development management. It is only since the Planning and Development Act 2000 and the Planning and Development (Amendment) Act 2010 that formulating evidence-based policy through a hierarchy has been given appropriate statutory recognition. The need for evidence based planning policy, demonstrated through the use of core strategies, flood risk assessment, housing strategies, is now largely accepted. More recently, and particularly since the housing crisis, there is a further evolution in planning, which emphasises

implementation and addressing the need for the structures of the planning systems and tools available to planning authorities to be adequate to support the delivery of objectives in development plans in a proactive manner.

Many of the key concepts underpinning the NPF are not new. Planners have been calling for more balanced regional development, consolidation and strengthening of existing urban centres, integration of land use and transport, etc. for decades. These principles form the basis for all development plans. Indeed, many of these well-established planning principles underpinned the NSS. The real weakness of the NSS lay in lack of effective implementation, particularly (a) lack of strong planning control over settlement patterns around the Gateways, and (b) lack of specific infrastructural funding for development in the Gateways. It had no statutory backing until 2010, it was largely ignored in choosing locations for decentralised Departments and agencies in 2003, and there was only a weak alignment with capital investment programmes. It looks as if these problems are being addressed, but the fact that the NPF will require Oireachtas approval involves increased risk that some of the hard choices identified in the issues paper will be evaded.

The National Planning Framework represents the top of the planning hierarchy in this country. It is hugely significant that growth and change can be directed and managed in a sustainable way. The NPF, as a replacement to the NSS, therefore, needs to be more 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.

The NPF has the opportunity to ensure that the rhetoric of our national planning strategy translates to practice through the development of a broad suite of policy instruments that are geared towards the delivery of strategic objectives. Careful consideration and innovative thinking will be required to devise the necessary toolkit to ensure the NPF has more teeth than its predecessor and is successfully implemented. Whilst alignment of capital investment programmes is central in this regard, this is just one component of a much wider range of measures that should be explored (e.g. active land management by local authorities, planning gain, use of core strategies, the role of the Office of the Planning Regulator etc.). The core factors that will determine whether the NPF can be implemented are considered to be as follows:

- 1. The NPF must be clear and concise. Actions must be specific and measurable against known benchmarks.**
- 2. 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.**
- 3. Plans for the delivery of the NPF must be coordinated across all relevant government departments.**

- 4. Emphasis must be placed on plan-led development with effective public participation (as part of a hierarchy of plans from the National Planning Framework at national level to development plans and local area plans at local level) in order to ensure that development is directed to the correct places.**

A number of other key issues for implementation are discussed under the points below:

- **Structures to facilitate cooperation:** More efficient collaboration between planning authorities requires a robust process for collating and understanding need. For example, using similar methodological approaches (e.g. similar guidelines in relation to collecting data on housing need) and consistent data management approaches (e.g. platforms such as MyPlan) facilitates discussions relating to housing constraints. Moreover, integration between marine and land planning requires in practice that local authorities and organisations involved in marine management (e.g. Waterways Ireland, Marine Institute) work together at a local level as well as a regional and national level to address impacts that cross the land and sea interface. It is critically important that public bodies that border one another or have shared planning concerns are required to engage constructively, actively and on an on-going basis in the planning process and that structures are put in place to facilitate that. For example, in the case of strategic matters that go beyond the local level (e.g. renewable energy, waste policy), consideration should be given to the introduction of a ‘duty to cooperate’ function for local authorities, similar to the UK’s system, whereby larger than local ‘strategic’ matters that may have significant impact on two or more local authority areas are considered as part of plan making. The Strategic Integrated Framework Plan (SIFP) for the Shannon Estuary is a good example of a multi-jurisdictional plan.
- **Strong policies regarding collection of data and the intersection between short term and long term planning:** Consideration should be given to the development of strategic housing land assessments in local authority administrative areas that are map-based and publicly available. The *Rebuilding Ireland Action Plan for Housing and Homelessness* is proposed to be in place until 2021. Should Local Authorities be aligning and planning 5-15 years in advance to keep up with Rebuilding Ireland post 2021 in order to accommodate the growth envisaged in the emerging NPF? A strong evidence base will be necessary in order to establish realistic assumptions about the availability and suitability of land to meet the identified requirements for housing under national spatial planning policy and programmes. Similarly, consideration should be given to employment land reviews, in order to facilitate estimation of the requirements for future employment uses.
- **Structures to facilitate consistency of approach:** In association with the NPF, there is a need for ministerial guidelines to ensure consistency of approach. Common and shared understandings of how such key assessments should be undertaken in order to assemble an evidence base that will command confidence as part of the statutory plan process will be central to the success of the NPF. Such guidance will command credibility and support the implementation of the NPF.

In order to address these issues, the National Planning Framework should be accompanied by an Implementation Plan, which will illustrate how the Framework will be incorporated into wider Government policy and lower tier planning policy documents. The Implementation Plan should set out the governance structures for implementing the NPF and establish who has overall responsibility for its implementation. The Plan should indicate specific metrics so that its implementation can be monitored. Timeframes for implementation of key deliverables should be set out. A timeline should be set out for interim reviews and progress reports for the NPF to track implementation, address areas where implementation is lagging and monitor overall performance.

The implementation of the NPF will require consideration of other broader issues in the planning system. In this regard, the Implementation Plan should address potential barriers in the planning system to effective plan-led development including measures to enhance plan delivery and co-ordination with lower tier planning policy documents. In respect of the latter, the Office of the Planning Regulator will provide a key oversight measure at local level. The establishment of the Office, as set out in the report of the Mahon Tribunal i.e. as an independent body, should be a priority. Other measures necessary to achieve effective land management such as the introduction of a site value tax should be instigated.

NPF Strategic Objectives

While some of the high-level objectives, especially in relation to sustainable settlement patterns and an all-island approach to spatial planning, are similar to those in the NSS, the Institute welcomes the application in the emerging NPF of lessons learnt from the implementation of the NSS, particularly the need to focus on the role of cities as the drivers of their regions. Most commentators now accept that the NSS failed to prioritise, and contained too many Gateways and Hubs. The NPF should be more focused and, while there is a need for a counter-balance to the eastern region, more concentrated investment and better transport links and development should be focused on 'gateway' cities and larger towns so that funding/investment could be ear-marked for these places.

The experience with the NSS has shown how a policy that is based on one spatial development perspective can be highly vulnerable to changes in economic and population performance during the plan period. The Gateway strategy did not prove as successful as hoped: while population initially grew faster than projected, it later slowed down. It is suggested that the NPF should make use of the scenario approach to test different future paths of development including Brexit, further policy integration with Northern Ireland, achievement of the targets in the Energy White Paper (which would suggest a radical change in mobility patterns) etc. It would be extremely beneficial if the NPF included a summary of economic forecasting models and potential outcomes, which have influenced the formulation of the Framework. Modelling should consider changes to key sectors and, therefore, likely spatial impacts as a result of Brexit and implementation of the Energy White Paper (e.g. the negative/positive effects of Brexit will be unevenly distributed). National planning policy also has to set clear guidance on more effective control on housing development in the hinterland of cities; the settlement patterns which are well documented in the issues paper are simply not sustainable into the future, not least if we are to have any chance of meeting our greenhouse gas emissions targets.

The Institute notes that the Issues and Choices document predicts that the population of Ireland will increase by at least 750,000 people by 2040, and probably by more. The document also suggests that there will be a need for an absolute minimum of 500,000 new homes within the period of the Framework. However, while the Issues and Choices document indicates that “we cannot rely on Business as Usual to deliver shared national goals”, the document does not set out what “big decisions” would have to be made in order to adopt a more sustainable settlement pattern or the likelihood of those big decisions being made. Almost half of all houses built in the year to August 2016 were one-off houses and the settlement patterns illustrated in the Issues and Choices paper indicate a growing spread of commuter-led development in settlements. Given this, the Institute would go further than suggesting that we cannot rely on “business as usual” and would express serious concerns about whether it would even be possible to accommodate the scale of growth envisaged by the Issues and Choices document by adopting a “business as usual” approach. The “business as usual” approach to housing provision has met with catastrophic failure, notwithstanding a protracted period of economic decline, slowing birth rates, increased rates of emigration and high rates of vacancy, as indicated by record levels of homelessness. As such, it is respectfully submitted that the emerging National Planning Framework must be very clear that there is no choice but to bring about meaningful change to existing settlement patterns in order to both address the existing housing crisis and ensure adequate and sustainable housing provision into the future.

In this regard, it is notable that the Issues and Choices document places emphasis on new development and that reuse of existing building stock is only mentioned once in relation to historic assets. While it is acknowledged that significant new development will have to occur, 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 also sets out a distinct policy for the use of existing development in meeting the strategic objectives of the Framework. This should be accompanied by measures in the Implementation Plan to realise this, such as a site value tax, reviewing Compulsory Purchase Order legislation and providing funding for planning authorities to engage in site assembly and release in brownfield areas.

In developing the NPF, there should be awareness that resource management and planning are inextricably linked, and sustainable development should be grounded in a thorough appreciation of these processes. Population growth and urbanisation have given rise to very significant demand for resources, with massive levels of consumption and associated waste production. Ensuring the management and efficient use of resources will be a central tenet of spatial planning in the years ahead. The planning system must, therefore, play a central role in the formulation and implementation of policy on such critical issues as climate change, energy, transport, industry, raw materials, agriculture and food production, fisheries, biodiversity, regional economic development, critical infrastructure delivery and land utilisation, to name but a few. The NPF as the overarching national planning policy has a fundamental role in this.

Regional Development

The Institute is in strong support of the emerging NPF objective to protect the important role of Dublin, while seeking to address the ongoing imbalance between the capital and other economic centres through more effective regional development. Capital city dominance increases regional inequality within countries. When growth in GDP is higher in the capital than in the nation, there is growing regional inequality. Successful capitals are crucially important to their national economies, but the risk is that they dominate the rest of the urban system so the national economy becomes spatially and structurally unbalanced. Urban centres with excellent road, rail and air links, port access and higher education institutions will play a pivotal role in bringing about more balanced economic development under the NPF. Specifically, Limerick and Cork have the capacity to support strong levels of employment and population growth and can play a central part in terms of promoting a more even spatial structure. However, it will be of critical importance that the NPF avoids pitting economic centres, such as cities and large towns, against each other in competition, but instead seeks to create vibrant centres with complementary functions. In particular, outside of their roles as key drivers for their regional economies, cities on the Atlantic coast should counterbalance rather than rival Dublin if balanced economic development is to be achieved. At a regional level, it should be acknowledged that towns near cities often offer similar services to the hinterland – it should not be taken for granted that towns and cities are operating in a complementary way. It is important to recognise the importance of corridors in terms of linking strategic cities and the settlements within them. How centres can specialise must be also considered - i.e. in identifying key centres for development, specific regard must be had to the unique qualities and attributes that can be capitalised upon. Identifying sustainable economic sectors that are thriving in each region and driving those sectors forward will be of critical importance in drafting the NPF.¹

While there were virtually no statutory regional planning guidelines at the time of the publication of the NSS, we now have had the benefit of over a decade of RPG experience. The fewer but larger regional planning bodies and the Regional Spatial and Economic Strategies also offer a real opportunity to combine bottom-up objectives coupled with the national policy priorities set out in the NPF. However, one of the big challenges faced by both the NPF and the RSEs is the relatively weak urban structure north of a line from Dublin to Galway. The Institute supports the finding of the NSS Expert Review Group that the concept of linked centres has not been sufficiently established.

1. For example, Shannon Airport has the longest runway of any airport in the State and, unlike Dublin Airport, has unrestricted operational capacity and significant potential for physical expansion, which would, in turn, facilitate growth in airfreight. In the western region, the potential of Shannon Airport could be harnessed so that Shannon Foynes and the wild Atlantic way can all grow and develop.

Rural Development

The real difference between the NSS and the NPF is the focus on Gateway cities rather than 18 Gateways and Hubs, but it is not clear from the Issues and Choices document how it is envisaged that the Gateways will energise the surrounding rural areas. Recognition of the symbiotic relationship that exists between rural environments and urban centres as outlined in the report of the Local Electoral Area Boundary Commission (published May 2013) is vital.

Any comprehensive strategy for sustainable regional development must consider both urban and rural development in tandem. Traditionally, the definition of rural Ireland has been too broad. It must be understood that the hinterland links to small rural villages, which link to towns, which, in turn, link to cities. The NPF needs to explain this relationship. The possibility for balanced and equitable territorial development requires an alternative development sphere within the country, using cities as anchors within regions.

Therefore, there must be a stronger connection between towns and their rural hinterlands from a planning perspective. Part of the solution lies in extending high-speed broadband to rural areas, which will allow smaller towns and villages to become part of the digital economy and which will facilitate more flexible working arrangements which are becoming so dominant within the knowledge economy. Consideration should also be given to the designation of rural business hubs (*See the UK report Living Working Countryside: The Taylor Review of Rural Economy and Affordable Housing*).

An environmentally sustainable approach to developing the rural economy is required in order to ensure that the growth of rural industry can be sustained in the long run with minimal impact on the environment. The manner in which development which is cognisant of the environmental context in which it is situated will be key to ensuring that businesses operating within the extractive sector as well as the agricultural and construction sectors can sustainably grow, employ and expand without compromising environmental integrity. The development of alternate sources of energy from renewable infrastructure in rural environments is also a critical consideration in terms of reducing the State's carbon footprint. In terms of providing for economic growth on the strength of environmentally sustainable development, investment in the 'Green Economy' yielded an estimated €2.8 billion in exports in 2008 with close to 6,500 people employed in the sector (Forfas, 2009). Renewable energy should be integrated within larger supply chains within rural economies, such as agriculture, forestry, traditional manufacturing and green tourism. The promotion of alternate sources of energy from renewal infrastructure should, therefore, not be solely focused on the achievement of climate change targets. The NPF should seek to capitalise on the rollout of renewable energy in rural areas through highlighting the spin-off opportunities that might be developed (e.g. manufacturing of components, etc.).

Energy

Energy should be a central concept within the NPF and renewable energy policy should be considered as a spatial component. In this regard, it is noted that the Issues and Choices document refers to possible Strategic Energy Zones. While this might be suitable for wind energy, it is important to be cognisant that this spatial component could hinder the rollout of other sources of renewable energy, such as solar and on-farm anaerobic digestion, which have very specific location requirements. Guidelines for each renewable energy technology may be appropriate.

Strong and unambiguous implementation policies in respect of achieving a low carbon society by 2050 must be set out in the NPF and in subsequent regional planning policy and county/city development plans. The implications of this for other sectoral areas such as transport, settlement, landscape etc. should be clearly set out with the necessary complementary policies.

Green energies will result in lower emissions and support our need to reduce emissions in line with EU targets. A greater range of alternative energy usage needs to be explored, taking into account the impact on the environment, making use of tools such as Strategic Environmental Assessment, Environmental Impact Assessment and Appropriate Assessment. The usage of fossil fuels should be further discouraged. The positive element of lowering emissions needs to be brought to the fore: e.g. a cleaner environment and better air quality will also improve public health.

Housing

Housing should be more innovative, energy efficient, and respond to population needs for various units sizes. Higher densities should be encouraged in appropriate locations, close to city/town centres and transport links. However, this needs to be well planned to create places that people want to live and work. A mix of units types/sizes relevant to the population profile in the area needs to be provided. For example while smaller apartments are more suited to single person households or couples, many families do not aspire to live in an apartment, which can be limiting relevant to size, issues such as noise, availability of open space/play areas etc. There is a danger that the current emphasis on the need to increase housing supply will be overly focused on quantity and the perception of market needs in the short term rather than long term sustainable housing provision. Quality in development is needed. This quality can be provided through the consideration at a national level to reference to 'Design Codes' as part of large strategic multi-phased development applications (e.g., strategic housing developments over 100 units to An Bord Pleanála, Local Infrastructure Housing Activation Fund (LIHAF) schemes, Strategic Development Zones etc.) to deliver a consistent design quality approach where many design led teams firms may be involved.

The requirement for a rigorous evidence-based assessment of future needs for housing and economic growth cannot be underestimated. The imposition of population targets (and therefore, housing requirements) by regional and national level authorities on local authorities (i.e. to be reflected in the Core Strategies in Development Plans) led to the formulation of housing strategies that were often unrealistic and undeliverable. It is imperative that local

authorities feed into the projected population targets as part of the NPF process based on a rigorous local level assessment. This assessment should be based on meeting local housing requirements and supporting self-sustaining settlement rather than long distance commuting. A consistent methodology should be provided (via Guidelines) to ensure the same approach is adopted for each local authority. This will be essential to ensuring that the NPF is deliverable.

It is also critical that planning authorities, particularly in cities, are more actively supported in delivering housing to ensure that housing needs are met locally and long distance commuting is not generated by a failure to provide housing. The recent LIHAF recognises that in order to deliver new development in major urban areas (Cork, Dublin, Limerick), and, in particular, in order to deliver new housing development, it is essential that the funding for infrastructure is frontloaded and that the wider social, economic outcomes are identified and secured through the preparation of Multi-Criteria Analyses. A permanent means of infrastructure funding must be established. It is important to recognise that support is also needed in lower tier urban settlements outside our major cities. A dedicated fund should be considered to facilitate a fair and equitable balanced region.

A radical revision of the national policy on rural one-off housing is needed. The current policies in development plans are too permissive as is evident from the high number of planning permissions. For example, between 2010 and 2013 one-off units represented between 30% and 52% of all housing units granted permission each year. The first progress report on *Rebuilding Ireland: Action Plan for Housing and Homelessness* stated that in the year end to August 2016, one-off houses represented 42% of housing commencements, an increase from 39% in the preceding period. There are urgent reasons to review current policies e.g. the demise of small towns and villages in rural areas, car based mobility vis-à-vis energy policies, objections to wind farms and electricity pylons, climate change. The NPF should propose new national guidelines and set a clear direction for the content of such guidelines given the need to integrate rural housing policy into policy relating to climate change, transport, energy and landscape.

It is essential that the NPF communicate why controls on one-off rural housing are important and of the implications of a dispersed settlement pattern. In this regard, the Institute welcomes the distinction made in the Issues and Choices document between rural areas, which are within sustainable commuting distance of major urban centres and those which are more remote and losing population. Facilitating the development of one-off dwellings in remote rural areas will not deliver sustainable development and has the potential to contribute to social segregation in the housing mix. Moreover, due to the need to maintain certain standards of residential amenity, dispersed rural housing can create impediments to essential energy, transport and telecommunications infrastructure.

Strategic Infrastructure Locations

Ireland will continue to need to develop large-scale strategic infrastructure. During the period of the National Spatial Strategy such infrastructure developments included the Corrib Gasline, midlands wind farms, electricity transmission networks, processing site for Liquid Petroleum Gas (LPG), waste incinerator projects and port land reclamation. Each of these had to be decided by An Bord Pleanála in the absence of a spatial policy framework at national level. The NPF provides an opportunity to develop such a framework.

Moreover, if a core objective of the NPF is to encourage much of the new development to be located in the cities, matching investment in all the categories of infrastructure required to enable such development will be essential. Strategic infrastructure, by its very nature, takes many years to design, obtain development consent, procure and deliver; this implies multi-annual capital investment programmes linked to specific locations identified in the NPF. There has to be certainty that funds will be made available despite ups and downs in budgetary cycles. The 2016 EU Country Report on Ireland, cited in the issues paper, references evidence that capital budgets were slashed to a disproportionate extent during the post-2007 crash, to the extent that even now there are insufficient funds to maintain existing infrastructure, never mind investing in major new projects. Failure to make adequate provision for investment for essential infrastructure could result in the goals of the NPF not being achieved.

Employment

The National Planning Framework needs to identify priorities in regard to the future employment growth, development and investment in infrastructure, which should, in turn, inform the national settlement strategy for the State. The NPF should place a strong emphasis on investment in encouraging job creation in varying sectors and on retention of our educated people to contribute to developing the Irish economy. This has the advantage in sustaining a greater population age/mix balance and prosperity in the larger towns and cities in the regions. It would also reduce the need for long commutes to the Dublin area, where most Irish employment is now based.

A clear strategy for the provision and delivery of the necessary infrastructure to enable development, particularly in locations outside of Dublin with inadequate infrastructure, will also provide certainty for investors and facilitate more balanced economic development. Specifically, the World Economic Forum *Global Competitiveness Report 2016-2017* specifically identifies an inadequate supply of infrastructure as one of the most problematic factors for doing business in Ireland. However, having regard to the challenging nature of the current Foreign Direct Investment (FDI) environment, it is essential that the NPF is informed by a more nuanced understanding of the requirements of investors. Many of the policies of the National Spatial Strategy were predicated on the basis that infrastructure, of itself, would attract FDI, and that geographic specialisation would occur, which is not always the case. The concept and implications of clustering industrial activity is not well understood, nor is how industrial networks work in regions. An understanding of how indigenous firms form and operate and of the relationship of indigenous firms with FDI on a regional basis will be

an important consideration. It is essential that the NPF be informed by an inventory of the resources, strengths and weaknesses of each region. The new NPF should form the basis for stable and sustainable economic development, facilitating better coordination of economic policy at local level and direct investment appropriately at regional level.

The location of industry and employment has implications for travel patterns and broader settlement trends. Appropriate scale and siting of economic development can contribute to compact settlements, achievement of modal shift to sustainable means of transport and the vitality and viability of urban centres. The emphasis on consolidation and brownfield development for housing development must also be placed on employment development. Currently, core strategies must set out an evidence base for residential zonings. A similar approach should be adopted for employment zonings and the NPF should support such a position.

Transport and Travel

The greater the proximity between homes and work, and between manufacturing and markets the less transport demand there will be on both the freight and personal travel side. Density is an important policy instrument as it achieves an urban form that is more compact. However, in addition to density, mixed land use policy can also contribute to greater proximity and a reduction in travel demand although it has to be recognised that the proximity between homes and employment does not in itself guarantee short commuting distances.

Moreover, the territorial cohesion principle in EU policy suggests that access to services such as medical care and education should not depend on where one lives and should ideally be the same for everyone. This however is difficult to achieve given the trend to concentrate services in the areas of greatest demand, i.e. population centres. There is a need for the National Planning Framework to minimise the effects of such concentration through a range of measures. These include: urban networks in which small settlements are linked with larger centres of population, innovative transport solutions such as demand based bus services in rural areas, the inclusion of development objectives for transport (both public and private) and communications (broadband) in spatial planning policies at all scales.

The Gateway Concept illustrates the importance of considering access when deciding on settlement patterns and urban hierarchies in national and regional plans. By concentrating transport infrastructure that connects a region with the rest of the country in a single urban centre, combined with good internal transport networks within the region, overall quality of access in the region can be maximised.

Indeed, the investment in the national motorway network has radically changed the accessibility of the regions within Ireland. The continued improvement of this network puts development pressure on land adjacent to this network, particular in the vicinity of motorway interchanges. It is important that a national policy is developed to protect these areas both for suitable development, but also to prevent dispersed commercial and residential development from occurring. In line with this, there needs to be greater development of sustainable and accessible public transport. Existing public transport infrastructure is not well connected or linked, particularly outside of Dublin. Cycling and walking must be encouraged through greater accessibility, priority and permeability.

Economic success in many countries is built on the integration of transport and spatial planning effectively at national, regional and local level (e.g., Stockholm, Sweden; Freiburg, Germany; Luxembourg). Integrated transport and spatial planning policies facilitate sustainable development focused around transport. It is vital that consideration of strategic public transport infrastructure, such as high speed rail, is integrated into a new spatial planning policy for Ireland. In the absence of complementary spatial planning policies directing development to appropriate locations, strong investment in public transport infrastructure could, paradoxically, lead to urban sprawl by facilitating faster travel from the commuter belt around urban centres.

Urban Sprawl and the Importance of Green belt

The NFP does not provide much mention of green belts. There is a need to avoid urban sprawl and to provide definite boundaries to cities, towns and villages. This is especially true at the edge of centres. There is a need to preserve quality agricultural land and landscape character and to provide for recreation and leisure activities. Urban sprawl is linked to the broader issue of how we plan settlements within the commuting zone of our cities, the legacy of which is illustrated by the AIRO maps on page 8 of the Issues and Choices document. As indicated above, the Institute is concerned that the level of population growth and the extent of new housing envisaged under the emerging National Planning Framework will not be achievable under the current “business as usual” and will result in a combination of runaway urban sprawl, extending the current pattern of long distance commuting particularly around Dublin and other cities, and an exacerbation of existing trends towards unsustainable rural housing in remote locations. Strong metropolitan governance structures and oversight of lower tier planning policy documents must be put in place to combat urban sprawl and unsustainable dispersed settlement patterns. In order to promote more sustainable development in commuter towns, such metropolitan governance structures should place a strong emphasis on the densification of the urban area; the provision of a mix of affordable housing types; re-use and improvement of existing building stock, particularly in urban areas; the creation and encouragement of walkable communities; place-making and the improvement of the public realm of existing communities (e.g. greening/planting) and the growth of these centres on a self-sustaining basis rather than on the basis of commuter led development. While the detail of the measures may be outside the scope of the NPF, it should be a recommendation of the NPF that such measures be put in place in order to ensure that the NPF is implementable. It is also appropriate for the NPF to indicate strategic policies regarding where development should not take place, e.g. the creation of green belt zones around designated urban centres.

Marine Spatial Planning

The NPF forms an ideal policy document to consider the implications of marine spatial planning for the local authorities with a coastline. It is vital that the national marine 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. 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. As an island the marine is our greatest resource and for too long we have tended to turn our backs on all that it has to offer and to give relative to the economy and to the impact on our environment.

Landscape

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. Tourism is one of our greatest assets so this needs to be encouraged and further developed. A greater emphasis needs to be placed on appropriate leisure and recreational facilities and on the design of such facilities in rural and urban areas. 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.

Arts and Culture

There needs to be greater emphasis in the NPF on the role of the creative industries rebalancing the national economy (e.g. the potential of European City of Culture in Galway amongst others). Spatial planning policy should seek to support arts and cultural infrastructure that operate as both physical and digital meeting places for creativity and innovation. The Issues and Choices document should take consideration of the role of culture, including the arts, to improve health and well-being. Culture can help individuals and communities by bringing people together, welcoming differences and removing social barriers.

Integration with Northern Ireland

The need for an all-island Spatial Plan is becoming all the more evident with the emerging planning issues that have cross-jurisdictional considerations, such as marine spatial planning, landscape management, transport infrastructure, agriculture and employment. Specifically, it is noted that the mapping presented in the Issues and Choices document indicates that the north western region has some dependency on employment and linking to Northern Ireland. This suggests an opportunity for Northern Ireland to act as a focus for the north western region.

The degree of spatial and functional integration between the Republic and Northern Ireland and between the main urban development areas of Dublin and Belfast and the potential role of Letterkenny/Derry as a city in the North-West is highly uncertain in the wake of Brexit. It is vital that the NPF give consideration to this. The implications of Brexit remain to be seen, but from an environmental and planning perspective, the island of Ireland must be considered as a single entity. It is essential that the NPF seek to identify areas where collaboration with government bodies and authorities in Northern Ireland can assist competitiveness and facilitate balanced economic development across the island of Ireland.

Conclusion

The Irish Planning Institute appreciates the opportunity to give its views on the emerging 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.



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