



MSc Spatial Planning
Proper Planning & Sustainable Development

To National Planning Framework.IE
30th March 2017

As an independent planning consultant based in Wicklow I have been very closely watching the evolution of forward planning in the county since 1999. I saw the adoption of the 2002 National Spatial Planning Guidelines and the 2004 Wicklow County Development Plan and the way in which, despite initial objections from the then Department of the Environment, with a clever manipulation of wording the Wicklow plan was past with massive over-zoning, the inevitable hoarding of land, subsequent inflated land prices and the inevitable crash.

I saw the political manoeuvring which led to a dilution of the professional advice to limit the growth centres around the country in the SPGs and the parallel identification of 4 towns and 14 villages for growth in County Wicklow. This dispersal of new development was compounded by the devious interpretation of the term 'local', which allowed for unsustainable growth for the commuting public in areas that lack the necessary physical and social infrastructure. The lost opportunity to develop viable economic and social communities resulted in the decline in economic activity in the county and the spread of dormitory towns.

Since that time the planning profession has progressed in leaps and bounds and the quality of county development plans in Ireland has become better and better, espousing the generally accepted principles of sustainable, compact settlement. This culminated in a well-drafted plan and the de-zoning of significant hectares of land in County Wicklow in 2016, though the number of growth centres remains the same.

It is clear from the issues document and numerous statements by the Minister, Simon Coveney that lessons have been learned (even regarding the contentious subject of one off housing which is still increasing apace) and I have no doubt that the principles that will be established in the new National Planning Framework will not displease. I am confident that it will be an excellent example of contemporary ideas of planning for a modern economy in an international setting. However my primary concern is with the implementation and it is that section, on implementation that I will address my comments.

Q. When it comes to implementation and monitoring, are there common goals that can be applied to every place?

A. Yes. Whilst each region, city, town and village needs to recognize its own assets and plan to develop accordingly we will all be commonly affected by the changing climate

and social disruption. The National Planning Framework must ensure that each and every functional unit must plan for compact settlement that is in the first instance walkable and have easy access to clean water and land for the production of food.

Other goals that must be identified clearly are not only for local employment but also for social goals that enhance the development of strong communities to be able to resist the challenges ahead. Well-being is a relatively new concept but one that is readily understood: it includes mental health, which depends on access to open space and the natural environment.

It goes without saying that we must protect the environment on which we all depend (there are no jobs on a dead planet).

Q. What barriers exist to its implementation?

Answer.

1. A key barrier to successful implementation will be a lack of clear goals and the use of loose language. As referred to above, the original Strategic Planning Guidelines proposed that towns and villages not designated for growth should be allowed to expand for 'local' growth only. Supporting papers to these Guidelines make it clear that this was intended to mean in the region of 10% growth in a plan period of 6 years but this stipulation was not spelled out in the Guidelines and the term has been totally abused to allow for whatever the local councillor believed possible. 'Local' now means having lived in the county for one year! Many villages in County Wicklow expanded by well over 300% even though these places can still never reach a viable population to make for a sustainable place with public transport and amenities. This must not be allowed in the new National Planning Framework.

2. The language in the Act that grounds the National Planning Framework must also be proofed legally, presumably by assessing the final draft using Regulatory Impact Assessment. Is the need for subordinate plans to be 'consistent' with the Framework adequate? Does the wording need to be 'compliant' to ensure there is no legal opt out?

3. The final draft must also make clear that it is to be implemented across the gamut of planning authorities or it will not be effective.

Box 5.2 (page 103) of the Strategic Planning Guidelines was an excellent guide by which to assess the suitability of a site for development yet it has not been accepted by An Bord Pleanála as adequate reason to deny approval. In a recent case (PL 27. 246799) 179 houses were proposed for a zoned site on the edge of Ashford Village. On appeal the Board's Inspector judged that this site did not meet five of the seven criteria established by that section of the guidelines, or indeed national, regional and local guidelines.

The asset test: local primary schools are full

The carrying capacity test: water supply is uncertain

The transport test: public transport in the village is very poor and development will lead to more traffic heading north on an already full N11/M50

The economic test: there is no likelihood of local employment

The character test: The design was out of character with the existing housing in the area.

However the Inspector's recommendation that the proposal be rejected was not accepted by the Board on the grounds that the site was zoned. This development will now go ahead with hapless residents trapped into a car dependent live style amid dangerous local roads and a poor urban environment.

4. The same case can be cited to illustrate another issue in implementation. **Will the final draft of the National Planning Framework deal with the problem of trying to retrofit** the new understanding of sustainable compact and restricted development on the existing dispersed settlement pattern that was allowed to develop in the past 20 years?

The Inspector in this case clearly questioned the efficacy of Wicklow's Development plan for developing ALL its towns and villages. *"It begs the question as to why Ashford is targeted to provide for a doubling of its population up to 2022* (page 22 of the Inspector's report). *There is no understanding as to why Ashford would be selected to facilitate such an expansion of population in the immediate term* (page 23 of the Inspector's report).

If this matter is not dealt with in the National Planning Framework and ways found to realign existing country development plans then dispersal of settlement and economic development will continue and the framework will not have any impact on the spatial planning in Ireland.

It is also noted that with the extensions granted to the lifetime of existing permissions many estates are now commencing which were granted permission during the boom decade when permissions were granted for very poorly designed developments.

5. The poor quality of urban design (particularly outside of Dublin) will also be an impediment to fulfilling admirable intentions of building sustainable communities.

Too often local councils do not feel qualified to comment on poor design, which frequently fail to address generally accepted principles to ensure quality of life. The quote the excellent Urban Design Manual these criteria are listed as *context, connectivity, inclusivity, variety, efficiency, distinctiveness, layout, public realm, adaptability, privacy, parking, and detailed design*. How many estates built outside of Dublin meet these criteria? Not many yet local councils and An Bord Pleanála do not require these standards to be met for permission to be granted.

Nor do building regulations go far enough in requiring quality construction to meet the needs of more compact settlement nor a changing climate in order to build for the 21st century.

Whilst it is understood that the National Planning Framework is not intended to be a detailed document, with such matters being left to other bodies, if guidelines such as the Urban Design manual are not given statutory authority the goal in the National Planning Framework of guiding development to provide well being for all will not be met.

6. One of the failings of the Spatial planning guidelines was the failure to integrate state spending on physical and social infrastructure in line with the spatial plan. It appears this is to be rectified in the National Planning Framework. It will therefore be important that the recently adopted Local Economic and Community Plans are integrated into the framework in order to get local buy-in to the new directions.

Q. What levers are needed to deliver greater efficiencies in implementation?

Answer. Training and properly conducted work reviews of staff.

Q. What are the key indicators by which to measure the success of the National Planning Framework?

Measuring the success of the National Planning Framework will depend on the setting of clear goals and collection of good base line data. It must measure outcomes, not inputs.

Obviously it will measure such statistics as the growth of key cities and sustainable towns – generally accepted as being round 20,000 for town (to support a good bus service and medical centre for example) and 5000 for viable town/village units of around 5000 (to support a local secondary school, food market, road sweeper, for example). This will be set beside a declining number of one off houses or isolated clusters of development.

It will also obviously measure economic development and the growth of indigenous businesses.

However if, as promised, the key goal is improved quality of life and well being, new indicators must be developed and utilised. It has been shown that a key indicator of well being is health and it is noted that the last census did collect statistics relating to our perception of our health. These should be expanded and included as an indicator of success in our National Planning Framework. Many of our health problems relate back to the opportunity for more walking and this, together with the use of public transport should be highlighted in any review of progress. Similarly access to quality food, indeed to locally grown food, will also be key indicator of success.

But the number one essential is that Ireland moves RAPIDLY towards a low carbon life. By 2040 the world will be a very different place. Many things will have changed beyond recognition (as they have changed in the past 20 years). This Framework plan must prepare us for whatever eventuality arises.

END

Judy Osborne BA Econ (Hons) MSc Spatial Planning

