



INTERNATIONAL CENTRE FOR LOCAL AND REGIONAL DEVELOPMENT (ICLRD)

**Submission to the National Planning
Framework (NPF)
*Ireland 2040: Our Plan – Issues and Choices***

March 2017

The International Centre for Local and Regional Development (ICLRD) welcomes the publication of *Ireland 2040 Our Plan: Issues and Choices* (February 2017). As the spatial aspect to wider government policy until 2040, we broadly agree with the key themes presented in the National Planning Framework (NPF) consultation document and welcome the opportunities over the coming months for informed debate on the inter-relationships between these core issues and the role of planning in building on opportunities and addressing challenges.

Having a long-term vision for the future growth of Ireland, including its inter-relationships with Northern Ireland and the U.K. on a North/South and East/West axis, is core to the achievement of sustainable balanced development. As the country emerges from a very difficult recession that impacted so significantly on people, place and well-being, there are already signs of significant pressures bearing down on existing infrastructures. In planning for the next twenty years, it is essential that the implications of any development on infrastructure is considered – together with their associated ecosystems – and that this, in turn, is aligned to the Capital Investment Plan for Ireland.

Rather than addressing each of the questions as posed by the NPF across its various sections this submission will, under the core themes identified, outline ICLRD's key propositions on that topic and associated key policies/priorities that we would like to see reflected in the NPF.

This paper has been prepared by the following members of the ICLRD (see Appendix A for further information):

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We would be happy to liaise with the Department directly on any of the points raised in the following submission via our Director, Ms. Caroline Creamer:

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1.0 Section 2 - General Comments

- 1.1 The NPF recognises that over the next twenty years the population of Ireland will increase by over three-quarters of a million people; and that in recent decades, the peoples' of Ireland have become more diverse, educated, outward looking, dynamic, and technologically focused. We have experienced unprecedented growth over the past two decades – in terms of population, employment figures, housing development, spatial spread (sprawl) of our villages, towns and cities – with trends indicating that, with recovery, these patterns are set to continue.
- 1.2 Added pressures will come from an ageing population and associated health and service needs that come with that; a decline in average household size which in turn raises questions about the suitability of the current housing stock and the type of dwellings that we should be constructing over the medium-term; and the distribution of employment growth which, in turn, is so closely related to housing pressure points.
- 1.3 The spatial development patterns that have been driven by excessive development over the past twenty or so years are unsustainable. Ongoing concentrations of population and employment along the Eastern Seaboard corridor is not sustainable if necessary infrastructure is not put in place. These growth patterns also have serious implications for the growth of the island as a unit. The commuter belt could be regarded as being 'out of control' – stretching as it does to parts of Cavan and Laois. Long commutes ensue which negatively impact on work-life balance and general health and well-being.
- 1.4 There is a growing recognition and acceptance of the need to align development strategies with social strategies – a shift in thinking currently being led by local authorities through the Local Economic and Community Plans or LECs (albeit in somewhat of a vacuum in terms of national strategic priorities).
- 1.5 As a country, we have not always been in a position to meet our environmental targets and requirements under EU legislation. To meet future emission targets and more broadly support our efforts to adapt to climate change, there is a strong onus on Ireland to 'do better' in terms of environmental management and protection and achieving broader resilience in the sustainable development agenda.
- 1.6 It is regrettable that little, if any reference, has been made in Section 2 to the interrelationships between the Irish border counties and Northern Ireland. Indeed, the maps used in this section contain no details for Northern Ireland thus ignoring the importance of Northern Ireland – spatially and economically - to the border counties (and vice versa). In the intervening years since the emergence of the NSS, cross-border planning and the need to recognise and reinforce an All Island Economy have been promoted and developed in both public and private sectors, and yet the NPF does not currently seem to recognise or promote the above. It is also of concern that no reference has been made in Section 2.2 to the significance of trans-frontier population and economic activity on settlement

patterns, movement of workforce and/or business growth. While giving due regard to jurisdictional boundaries, the NPF must address all parts of the island of Ireland.

1.7 We strongly endorse the idea of an NPF as a statutory document. We are encouraged by the commitment to aligning implementation with public and private investment supports; in many ways providing a cross-sectoral overarching framework for investment. We welcome its coordination of the spatial aspects of a wide range of sectoral policies – housing, jobs, transport, education, health, environment, energy and communications. We also agree with the notion expressed in this section that treating all parts of the Country in the same way is unrealistic - this will not achieve equality of outcome or contribute to a stronger overall set of national outcomes. For this reason, we believe that diversity of approach to different regions will be the key to releasing the full potential of an NPF- particularly important given the likely challenges that Brexit will present for the Irish and all-island economy.

2.0 Section 3: Health and Well-Being

2.1 The ICLRD fully welcomes the emphasis placed on population health and wellbeing. Unprecedented growth over the past two decades has not only profoundly affected people’s health and well-being but also the sustainability of the natural environment. Added to this is the challenges posed by an ageing population which has far-reaching implications for all aspects of society

2.2 Many of Ireland’s urban areas are characterised by sprawl – low-density, car-dependent settlements surrounded by new fringe housing estates often not in scale to the actual needs of the community or indeed having the necessary additional capacity in transportation, education, health services, community facilities etc.

2.3 A lifelong cycle of health as a concept needs to underpin the NPF’s approach to health and wellbeing given the timescale and scope of Ireland 2040. A more comprehensive analysis of the role of planning in health outcomes is required. This is particularly important in areas of high urban and rural deprivation where health inequalities are more concentrated. While this is a national issue, particular reference should be made to the evidenced impact of the border on health and wellbeing.

2.4 Good spatial planning helps improve the ‘liveability’ of areas (Barton 2009). Northern Europe provides some inspirational examples of how environmental sustainability and supporting healthy lifestyles can come together through spatial planning. In Vauban (an extension of the Germany city of Freiburg), for example, 70 Per cent of trips are made using active travel modes (University of West of England, 2009).

2.5 Within Leeds City Council, a health and well-being strategy has been embedded in the Council’s Core Strategy – its strategic spatial planning document for the

period 2012-2028. A key focus of the Strategy is the delivery of sustainable development, which takes into account a range of economic, social, and environmental issues – including health.

Policies that the NPF should include to effect improvements to our general health, including physical and mental wellbeing:

- 2.6 Area development plans can meet the specific needs of the population. It is important that the NPF facilitates planned work around the convergence of public health policy / health improvement strategies and physical and built environment plans.
- 2.7 Places need to have facilities that are appropriate for their demographics – from children through to the elderly. Local employment, and opportunities for social and leisure activities, should for example be considered from the outset of the planning process. We need to champion areas that have a live – work community.
- 2.8 The NPF should include policies on supporting lifelong wellbeing at home, planning for dementia¹, healthy children and young people as the adults of tomorrow. This should include a programme of guidance to counties on planning for locally-accessible, safe physical play and activity areas; planning for primary care intervention centres – linked to quality of life indicators; and planning for reduced social isolation thus positively impacting on mental health and well-being.
- 2.9 Research by the ICLRD on the role of children in planning noted that a growing range of studies have examined the links between children’s physical activity patterns and their built environment. Research on where and how children play noted the decreasing interaction between children and the natural environment in most Western countries, including Ireland (Fanning, 2010; Woolcock and Steele, 2008; Sipe et al., 2006). This trend is largely attributed to the increasing regulation of children’s environments; not only at a spatial planning and social policy level, but also by parents as a result of their growing concerns for their children’s safety. Over the past decade, there has been a growing tendency for children’s playtime to be internalised – centred on the home and, as such, an increasingly indoor activity.
- 2.10 Greater emphasis is needed on the risks to health of habitual long commutes-associated risks of higher levels of long-term conditions in the population. As noted in the Issues Paper, in 2011 nearly one in ten workers spent one hour or more commuting to work – with 69% travelling by car.
- 2.11 The NPF needs to make specific provision for the planning of ‘healthy’ infrastructure – whether active travel modes and/or greenways and blueways for ‘down-time’. As noted by Corburn (2015) “greater pedestrian activity can

¹ The De Hogeweijk model of housing for people with Dementia should be examined as an international model of best practice.

promote physical activity that reduces heart disease, stroke and mental illness and increase functional status and the longevity of independence among the elderly. Creating new opportunities for pedestrian activity can also improve well-being by increasing the likelihood of social interactions that can reduce feelings of isolation". Table 1 below, adapted from Corburn (2009 – quoted in 2015), highlights urban health risks and resources.

- 2.12 Exposure to the natural environment has a positive impact on mental health. Current spatial patterns of development are not conducive to healthy living or integrated service delivery. Greater emphasis needs to be placed on connecting planning with health, housing and transport policies.

Key priorities for the NPF in improving the health and wellbeing of people and places

- 2.13 The *NPF – Issues and Choices* does acknowledge the need for greater policy integration and joined-up decision making, tackling social disadvantage, and ensuring healthy and active living options are available to improve individual quality of life and societal well-being, and to move away from a 'business as usual' approach (DHPCLG, 2017, p.21). However, the above goals cannot be exclusively achieved through a high level strategic NPF, or through regional assemblies. As the above extract, section 3.3.3., highlights, there is a need for more inter-sectoral solutions at a local level, facilitated through LECPs and supported by regional and national tiers, to inform better, more realistic, place-based approaches. Therefore, LECPs play a crucial role in coordinating and empowering local stakeholders and resources to address local issues and align actions to regional and national priorities. This bottom up approach must be embraced, encouraged and facilitated through relevant governance structures and ultimately be seen as complimentary to the top down NPF.
- 2.14 Joining health policy with other strategies such as housing, transport and planning provides an excellent opportunity for public health professionals, urban designers and spatial planners to work together to promote better health and reduce health inequalities.
- 2.15 While efforts are being made to address car dependency over the longer-term, greater attention must be given to the health of the economically active workforce and what particular approaches are needed to maximise the impact of environments which promote health and wellbeing. This requires architects, urban designers, planners and employers jointly examining cultures and work patterns which either promote or prevent health and wellbeing.

Table 1: Urban Health Resources and Risks

<i>Health resource</i>	<i>Urban physical and social influences on health (examples)</i>
Environmental quality, including noise, air, soil and water pollution	Vehicle emissions exacerbate respiratory disease and increase cardio-pulmonary mortality, while indoor allergens exacerbate asthma Chronic noise exposure adversely harms sleep, temperament, hearing and blood pressure, all of which can lead to developmental delays in children Trees and green space remove air pollution from the air and mitigate the urban heat island effect
Access to high quality transit and safe roadways, sidewalks and bicycle lanes	Vehicle/pedestrian injuries are most severe where sidewalks and crosswalks are non-existent Sidewalks and bicycle lanes facilitate physical activity, reducing heart disease, diabetes, obesity, blood pressure, osteoporosis and symptoms of depression. Public transit provides access to employment, education, parks and health care services
Access to quality childcare, education and health care facilities	Quality childcare can build disease immunities and increase likelihood of future educational attainment and earnings Education can enhance health literacy about preventative behaviors and services Timely access to primary health services prevents serious illness
Affordable, safe, stable and socially integrated housing	Crowded and substandard housing conditions increase risks for infections, respiratory disease, fires and stress Unaffordable rents or mortgages result in trade-offs between housing, food and medical care Racial residential segregation limits economic and educational opportunities, concentrates disadvantage and increases social distance between racial/ethnic groups
Access to safe and quality open space, parks, cultural and recreational facilities	Clean and safe parks can increase the frequency of physical activity Cultural activities can promote cross-cultural understanding, decrease violence and enhance social cohesion
Employment providing meaningful, safe and living wage jobs	Higher income is associated with better overall health, reduced mortality and higher emotional stability Unemployment is a source of chronic stress, while job autonomy increases self-esteem
Access to affordable and quality goods and services	Neighbourhood grocery stores support nutritious diets Local financial institutions help families create and maintain wealth
Protection from crime and physical violence	Indirect effects of violence and crime include fear, stress, anxiety and unhealthy coping behaviors, over-eating, smoking and alcohol/drug abuse Fear of crime can force children to stay indoors, increasing exposure to toxic indoor air and allergens, and limiting physical activity outside
Social cohesion and political power	Physical and emotional support buffers stressful situations, prevents isolation, contributes to self-esteem and reduces the risk of early death Stress from severed/lack of social ties/support can contribute to low birth weight, which increases risk of infant death, slow cognitive development, hyperactivity, breathing problems, overweight and heart disease.

(Corburn, 2009)

2.16 Children are key users of the built and natural environment – and within these spaces, they have their own particular needs. The creation of child friendly communities requires the provision of spaces and play facilities that are open ended: adaptable and capable of meeting children’s expanding interests and developmental levels, as opposed to designs based on adults’ perceptions of how children play. Children must be given a voice in the design of their spaces; and the planning system more generally. Simply designing children’s playgrounds to fit into left over space or poorly drained areas is not an appropriate way to cater to children’s needs. Equally, shared public space must be promoted and valued as there is currently a danger that new residential schemes in cities, towns and villages with small back gardens further isolate our children and provide a sheltered environment which parents consider as safe. Our children deserve better.

3.0 Section 4 – A Place-Making Strategy

3.1 As outlined in the Issues Paper, current policy is to direct future population growth to regional cities as a way to support effective economic and social development. This is understandable as cities have always been the engine for regional economic prosperity; as cities prosper so does the region in which they serve. Securing economic growth requires investment along key corridors. The Dublin-Belfast corridor, for example, is hugely significant in terms of the role it plays in international competitiveness and the spin-offs it generates (or has the potential to generate) for surrounding areas.

3.2 Ensuring effective regional growth is not just about cities though. Below this tier of settlement, there are a number of towns – based on their catchments and service delivery role – that serve an important role for those hinterlands falling outside the reach of cities.

3.3 Adopting a place-based approach to future development and investment must acknowledge the functional relationships between places and the movement of people between places.

3.4 *The Framework for Co-operation: Spatial Strategies of Northern Ireland and the Republic of Ireland (2013)*, while non-statutory, affords both jurisdictions on the island of Ireland opportunities to work together to harness strategic development opportunities. The Framework encourages policy-makers to take account of the wider impact of their work and exploit opportunities from a broader perspective. In the context of Brexit, and the many uncertainties it brings in its wake, this document will be a key instrument in supporting both administrations to work together on those challenges mutually shared.

Economic Development

3.5 With the population of Ireland expected to grow by 1million people over the next

twenty-five years, it is essential that the development required to accommodate this growth is not confined to the eastern corridor. The Greater Dublin Region must be developed in tandem with the regions – thus activating the potential of rural Ireland and the island as a whole. The sustainable growth of rural Ireland will support the urban engines of growth on this island.

3.6 The regions outside of Dublin offer a range of growth and investment opportunities; latent assets yet to be untapped which have the potential to offer competitive advantage.

3.7 Key to realising the competitive advantage of regions is improving connectivity and building the infrastructure of the regions; particularly in the North West and central border areas. Firstly, this includes recognition of and the continued expansion of air and port access - Ireland West Airport Knock, Derry City Airport, Port of Derry, Port of Killybegs; upgrade of the road network from Dublin-Letterkenny/Derry and Galway-Sligo/Letterkenny; and improved broadband access and speeds incl. ensuring greater benefits stemming from the INTERREG-funded Project Kelvin.

Technology enabled urban services

3.8 The ICLRD welcomes the references throughout the Issues and Choices Paper of:

- the need for effective growth to “positively interact with technological change and improved connectivity” (p.32);
- the common issue across both jurisdictions of the “requirement for fast and effective broadband, especially for business users” (p.36);
- the role of strategic national infrastructure such as broadband/telecommunications influencing “the spatial pattern of development” and contributing “to national objectives” (p.48); and
- the need for activities such as online trading to have a reliable communications network “in place to support the requisite quality of connectivity.

3.9 Irish cities, like most cities in the world, are at an early stage in their digital development. At the same time, it is becoming increasingly evident that a greater use of information and communication technologies by cities will form the basis for the efficient management of city assets. Cities of the future will typically use data collected from their own monitoring systems to offer improved transport options, react to environmental change, match energy production with consumption, while also engaging with its citizens on public service design.

3.10 There are significant disparities across Ireland in terms of access to broadband. This is well understood in terms of the urban-rural divide; less well so in terms of the internal urban disparities that exist. The National Broadband Plan (NBP) is seen as playing a key role in regional development – underpinning job creation, promoting social inclusion and reducing travel needs (and consequently contributing to the low carbon agenda).

Education

- 3.11 A strong education sector within a region is central to its effective development – as an attractor of investment, an incubator for R&D, a platform for in-migration, and a nurturer of an innovation culture.
- 3.12 There is a need for much greater collaboration between business and the education sector – universities, institutes of technology, colleges of further education, ETBs; indeed, even at post-primary level to highlight skilled employment opportunities locally and regionally. There is a growing need for the qualifications offered by third level institutes to reflect the needs of employers and especially emerging growth sectors. A greater understanding of the needs of employers must take place through detailed research and communication and a more practical based education system developed that actually prepares and re-skills people for the work place
- 3.13 The development of further links between third level education and employers, together with mechanisms for student retention, are recognised as a priority for all regions across the State.

Effective Regional Development

- 3.14 The general principle of ‘effective regional development’ within the Issues Paper is to be welcomed. This both requires, and commits, government to recognise the unique spatial geographies of the various regions across the State, and the requirement for a bespoke approach to regional challenges and opportunities across Ireland.
- 3.15 In planning for, and investing in, effective regional development, there is a need to focus on the functionality of regions, with local government encouraged to strategise accordingly. This may require operating outside of defined administrative boundaries; instead focusing on defined functional spaces – for which there is a growing evidence-base to support such actions. This may, however, involve looking at our local government system and developing methods and ways in which we can deliver a better shared services model that has failed us heretofore.

Resilience of Rural Areas

- 3.16 The Issues and Choices Paper captures to a large extent the many challenges facing rural communities. The failure of the NPF Issues Paper to reference the recently published Rural Development Action Plan, *Realising our Rural Potential*, is however regrettable. While its listing of action points is (too) extensive, it nonetheless recognises the individuality of place, the latent potential of local assets, the oncoming challenges posed by Brexit, and the need to empower and build communities. Rural Ireland is a hot-bed of talent and creativity; with communities having a strong sense of pride and ‘belonging’. Some direction and guidance on the role of towns and villages relative to rural areas could provide

the basis and platform for a more sustainable model for rural Ireland. Lower tier regional, county and local plans could then translate this model and key messages in a meaningful way.

- 3.17 Where the Issues Paper is lacking is in the elaboration of potential ‘solutions’. With the rural action plan only having a three-year life-cycle – and a very limited budget – there is scope for the NPF to take a longer term, more strategic approach/perspective.

Culture and Creative Industries

- 3.18 The creative sector is becoming increasingly important – both as a celebration of identity and culture and in economic terms. Culture 2025, Ireland’s first national cultural policy states that arts and culture are intrinsic to the Irish State, acknowledges the need to increase access to, and participation in, the arts, boost our creative industries, and preserve our heritage with a particular focus on language, landscape and the environment. Ireland 2040 provides an opportunity to embed culture, heritage and the creative sector into an overall national spatial strategy and an opportunity to further enable their delivery.

Key priorities for the NPF in facilitating coordination between settlements

- 3.19 *Stronger focus on well-being (social, economic and environmental) outcomes*
For the NPF to meaningfully influence spatial development in Ireland, and guide decision-making at regional and local levels, an important cultural and psychological shift needs to occur, one that goes from purely focussing on spatial concepts (e.g. gateways, hubs, etc.) to a way of incorporating high-level outcomes, which sit alongside spatial ideas. Taking an outcomes-based approach stimulates the creation of a shared vision, which various stakeholders actively shape and help the building of a collective sense of ownership. In addition, adopting an outcomes-based approach helps (a) support collaboration between citizens, local government and central government to reflect local priorities in national outcomes; (b) build more effective partnership working, across community organisations, government departments and business sectors, as they are pursuing the achievement of the agreed shared outcomes; (c) modify underpinning cultures and systems, of stakeholders and organisations, in the direction of mapping progress towards the outcomes that will be measured.

The current *NPF – Issues and Choices* document lacks any reference to Local Economic and Community Plans (LECPs). Given the significance of an NPF in shaping place-based responses to public policy and investment, there should be acknowledgement of how LECPs will be an important local government instrument that translates high level strategic policies to the local authority context, coordinated via the Regional Assemblies (and their RSEs). Clearly articulating the valuable role that LECPs have in co-designing a shared vision for future local economic and community development should help nurture better policy alignment.

3.20 *An accompanying performance management framework*

To achieve the joint vision and shared outcomes (in a NPF) will require a rigorous performance management framework that translates how the vision and outcomes will be delivered and how performance will be measured. This framework should help guide investment decisions and demonstrate better value for money, inform planning and public policy at regional and local levels, and provide better coordination between national outcome priorities and organisational plans/operations to help improve shared accountability and, ultimately, the quality of place-making (through Local Development Plans) and service delivery (through Local Economic and Community Plans). A robust performance management dimension to the NPF would help identify and rectify poor performance towards achieving outcomes at an early stage.

With a future NPF having a statutory basis, it would be important to clearly articulate the link – coordinating interface – between LECPs and City and County Development Plans. In particular, having a clearer and stronger link between these two planning activities, in local government, has the potential to better harness joint working, manage and share resources, nurture synergies between spatial development and service delivery, and, perhaps, avoid duplication in future, for example, around community engagement activities.

3.21 *Alignment with other Frameworks*

There is a need for the NPF to be aligned with other investment strategies and policy frameworks to maximise synergies and benefits for improving place-making and service delivery. This should be considered vertically and horizontally. Vertically, in terms of creating a 'golden thread' alignment from national outcomes to departmental/organisation teams responsible for shaping places and designing/delivering public services. Horizontally, in terms of working across professional and sectoral boundaries, to align spatial development strategies with social well-being strategies, e.g. there is the need for (land-use) planning officers and those involved with LECPs to be linked from the outset.

3.22 *City-Regions*

In addition to the recognised role of cities in driving effective regional development, there is a need:

- To ensure funding programmes are aligned to support the development of these cities and their associated strategies (Limerick 2030; Cork 2050, etc.).
- Recognise the potential of the Belfast-Dublin functional corridor and the council areas in between by both building on existing linkages such as the Newry – Dundalk Twin City Strategy and developing others that support the effective growth of this cross-border economic corridor.
- To designate Letterkenny/Derry-Londonderry/Strabane as a City-Region driving the effective development of the North West Region.

3.23 *Rural Resilience*

There is a need for a longer-term strategy for rural Ireland; that sits between the NPF and the Action Plan for Rural Development; and which can recognise the role and place of the 'rural' within wider, and more effective, regional development.

The role of the rural within wider functional territorial policy must also be examined in more depth; with initiatives at the functional territory scale ensuring initiatives are of strategic regional importance. Lessons can be learnt, for example, urban-rural partnership programmes in Germany which have challenged metropolitan and rural districts to identify potential synergies and means of working together.

4.0 Environmental Sustainability

4.1 Environmental assets do not adhere to man-made boundaries and it is widely recognised that there are many challenges - and opportunities - in integrating environmental management and development strategies at national, regional and local-policy level. Protection and management of the environment lies at the heart of European thinking; with the need to protect and conserve the environment referenced in numerous Directives.

4.2 Ireland's distinctive landscape is a living environment – a mix of settlement, wilderness, and protected areas. How these spaces comfortably co-exist can be challenging - especially in the areas of tourism, renewable energies, strategic infrastructure provision, etc.

4.3 The physical environment of Ireland is undoubtedly an asset that can provide scope for future potential growth and add to the quality of life of the region's inhabitants.

Marine Spatial Planning

4.4 Marine Spatial Planning (MSP) is now established as an integrated policy-based approach to the regulation, management and protection of the marine environment (Claydon, 2006) and is set to play a major part in the European Union's 'blue economy'. With the island of Ireland's prime geographical position in the resource-rich location of North West Europe, and with innovations in wind, water and wave and even algae technologies, MSP will be a vital process to enable renewable technologies to shape the future energy mix and to allow the island to emerge as a renewable energy exporter.

4.5 Notable emphasis is placed on the economic potential of the marine resource. A greater balanced is needed, acknowledging planning considerations and environmental responsibilities at the marine and coastal interface and the need

for a consistent approach when considering development management impacts on the marine area (a key aim of marine spatial planning).

- 4.6 The document acknowledges (albeit rather weakly) the need to ‘work together’ with the forthcoming Marine Spatial Plan (Section 4.5.8). Greater elaboration is needed on this point in terms of, for example, delivery, governance arrangements and how existing structures facilitate (or not) plan alignment across local authority and land/sea boundaries, to ensure integration of the terrestrial and marine planning regimes. It is also surprising not to find reference to marine planning in Northern Ireland particularly the bordering, shared, areas of Carlingford Lough and Lough Foyle. Related to this point, there is no reference to the potential of coastal governance regimes such as integrated coastal zone management or shoreline management which may contribute to the ‘strategic policy framework’ as noted in Section 4.5.8.
- 4.7 There is no specific mention of coastal hazards despite their growing intensity and consequence around our shoreline. In the context of global climate change, coasts are increasingly acknowledged as vulnerable places facing uncertain and unpredictable futures. Erosion, for example, threatens physical infrastructure (roads, buildings etc.) and established land-based fixed asset assumptions, but is also a vital natural process that sustains a healthy coastal ecosystem. Critically, there is no strategic approach to managing coastal change on the island of Ireland. It is unclear who has the responsibility, and power, to make decisions in relation to coastal erosion. As a result decisions have tended to be made on a sectoral basis with little understanding of the local or cumulative effects of such decisions. The established legislative framework has tended to prioritise economic objectives and recommend (implicitly or explicitly) the development of hard engineering ‘solutions’ (e.g. construction of sea walls). Such approaches often have unintended consequences which may exacerbate the problem and undermine the natural ecosystem which ultimately underpins the unique identity, and natural and built heritage of our coastal communities. Some acknowledgement of alternative adaptive responses is welcome, and the role of planning in terms of responding to, accommodating, and planning for anticipated and contingent physical change. It should also be made explicit that local planning authorities should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas.
- 4.8 Lessons can be learnt from the Scottish consultation on the Third National Planning Framework (Scottish Government, 2013) that brought together Government’s programmes and initiatives in providing a clear vision and a suite of national developments. Scotland’s thinking seems to be advanced and whilst Scotland is not made up of two separate planning systems, it has immense diverse space with very rural and very urban geographies and resources. And it is in this context with Scotland’s ambition and drive to focus on being ‘a low carbon place’ that makes it an attractive comparison. The ‘Blue Seas-Green Energy’ offshore wind plan (Marine Scotland, 2011) identifies offshore developments and is complementary to the National Renewables Infrastructure Plan. Scotland is further innovating in developments that could be easily

adopted for the island of Ireland, such as the establishment of a Marine Energy Park like they have created for the Pentland Firth and Orkney Waters.

Policies that the NPF should include in support of environmental sustainability:

- 4.9 There is a strong rationale to promote high quality urban living (and place-making) as an attractive alternative to dispersed rural one-off housing programmes – this will bring added benefits around air quality, reducing emissions and meeting carbon reduction targets, and cutting transport running costs.
- 4.10 Consideration should be given to developing Regional Landscape Strategies – with the regions taking a leading position on the protection, management and planning of landscapes.
- 4.11 The NPF should give specific attention to the issues of energy supply and resilience, linking these not only to the renewable’s potential of a region but also to opportunities that may exist for greater energy supply. For example, progress on the North-South inter-connector remains vital to the central border region and North West. Also, for places such as Donegal there are opportunities to connect to existing infrastructure e.g. at Coolkeeragh which is situated on the other side of Lough Foyle, a shared environmental asset which is managed through the Loughs Agency (one of the North South Bodies).
- 4.12 Consideration should be given to putting communities at the heart of the renewable energy programme by exploring micro-renewable energy solutions at the level of community heating schemes, farm digesters, hydro-energy, solar farms, etc. as part of wider Strategic Energy Zone/Corridors or REDZ programmes.
- 4.13 It would be useful to explore the possibility of alignment of priorities and approaches to environmental management across catchments/borders in the context of the cognate planning functions which now exist at a devolved local government level. Opportunities exist for simple and consistent collaboration in the preparation of area development plans and other protocols and procedures for shared approaches to environmental management.
- 4.14 The overlap between the marine and terrestrial environment requires some further elaboration not least in terms of the overlapping spatial and legislative responsibilities in the intertidal area. This will assist planning authorities, applicants and agents in their understanding of land and sea interactions and help identify, and satisfy, legislative requirements with regard to development projects.

While the document alludes to particular issues and opportunities facing coastal and island communities, a more explicit statement(s) on how such opportunities will be supported to help regenerate declining coastal communities and deliver sustainable economic growth, attracting and retaining

population and supporting services would be welcome. Place-based development plans for our coastal and island communities should recognise their role, importance and diversity.

5.0 Infrastructure Investment

5.1 In recent decades there has been an under-investment in infrastructure which, in turn, impacts negatively on economic growth and development. In 2016, Ireland was bottom of the table across the EU for capital Spend as % of GDP. With infrastructure being the backbone of economic activity – supporting job creation, exports and business development - there are a number of projects that need to be developed across the island of Ireland to increase our competitiveness.

5.2 CBI's report, *Unlocking Regional Growth*, highlights that there are three main reasons behind regional differences in productivity in the U.K.: (a) education and skills, (b) management practices, and (c) transport links. In terms of the latter point, transport matters for two main reasons:

- It broadens the labour market pool; and
- It provides access to wider markets.

5.3 With borrowing costs at an all-time low, now is the time for investment in strategic infrastructure projects that are smart and should address spatial imbalances and open-up the regions to greater investment opportunities (in terms of energy, water/waste-water, telecommunications, transport, housing, etc.)

Key priorities for the NPF in facilitating coordination between settlements

5.4 The NPF must be explicitly linked to the Capital Investment Plan for Ireland; and on a North/South basis to the Regional Infrastructure Delivery Plan for Northern Ireland (when finalised). The NPF should clearly identify those major infrastructure projects it regards as being of both national and/or regional significance – linking these to other sectoral priorities highlighted within the Strategy. The NPF should, as such, be aligned with national transportation policy, national climate mitigation policy and other key sectoral policies as relevant. These infrastructure priorities must also be closely linked with the potential of regions in terms of developing their comparative advantages.

5.5 This should include outstanding commitments under Transport 21 (N2/A5/N14, N15, N17, N6, Limerick-Cork Motorway), sustainable energy projects including on-shore and off-shore renewables, and the North/South inter-connector to name but a few.

5.6 To focus minds, the NPF would benefit from the inclusion of some scenarios – outlining the impacts and outputs stemming from the development of strategic infrastructure projects vis-à-vis no such investment.

5.7 One mechanism that could aid in the prioritisation of strategic infrastructure projects by regional stakeholders would be the establishment of structures and practices of the type that are now in place in the North West Region.

6.0 Implementing the National Planning Framework

6.1 There has been widespread agreement from the very outset that there needs to be clarity around how the NPF will be implemented, how it will be resourced and how its progress will be tracked (Kitchin, IrelandafterNama, 4 February 2017).

6.2 It is increasingly recognised at all levels of government that how we live and work does not adhere to administrative boundaries but more so to functional boundaries. This needs to be reflected in the implementation of the NPF with key delivery agents being encouraged to cooperate across and outside of their administrative borders. This is especially true of initiatives that span the common goals of economic development, enhanced connectivity, environmental management and protection and improved health and well-being.

6.3 There is a recognised need to move away from silo working across all levels of government – this often requires a culture change within organisations and can take time to achieve.

6.4 Potential barriers and risks to implementation are mainly lack of understanding of not only the core objectives of the NPF and their inter-relationship between spatial planning and other sectors such as economic growth, connectivity, environmental management and health and well-being. Indeed, there is a clear need for much more action research that is aimed at the general public and which details the inter-relationship and resulting good and bad practices under certain conditions - especially as it relates to health and well-being.

6.5 Lack of strong leadership is a further challenge to the implementation of the NPF; with again a clear need for investment in capacity building in this area. Such capacity building includes a focus on coordinated approaches to balanced regional development that is also sustainable, and which ensures that this type of coordination can happen alongside normal business.

6.6 Collaborative structures, matrix working and working with external broker/capacity building influences – as encapsulated by the North West model - highlights the importance of (up)skilling core teams (Chief Executives, Directors of Services, Senior Managers) to adopt the functional area approach of strategising and planning. Such an approach must be regarded as part of core business (rather than sidelining into specialist functions). Working arrangements cannot be rigid – they must be flexible to facilitate joint coordination and redress of issues as they arise.

key indicators for measuring the successful implementation of the NPF include:

- No. of shared transboundary area development plans created
- Increased frequency of flights to regional airports
- Creation of tech-spaces / incubation hubs outside of cities
- Number of shared catchment management plans
- Evidence of multi-agency and multi-disciplinary governance arrangements in support of such plans and strategies
- Population growth incl. spread across regions
- SME growth
- SME expansion into export markets
- Increased R&D between education bodies and companies
- Improved population health outcomes
- Employment growth

The Regional Indicators Report carried out jointly by the former eight Regional Authorities provide a sound basis for development of an implementation plan and relevant indicators that could also be used in the NPF.

Appendix 1: The International Centre for Local and Regional Development (ICLRD)

The ICLRDR is a North-South-U.S. partnership that has developed out of a unique collaboration between academics and spatial planning specialists from the National Institute for Regional and Spatial Analysis (NIRSA) at Maynooth University, the School of the Built Environment at Ulster University, and the Institute for International Urban Development in Cambridge, Massachusetts. Currently celebrating its 10th birthday, the ICLRDR was formally established in 2006 and, over the past ten years, has become a builder of bridges, a promoter of good planning, an honest broker and facilitator of change, and a driver of peace and reconciliation on the island of Ireland and elsewhere.

A central objective of the ICLRDR is to strengthen the policy and operational linkages between central, regional and local policy-makers and among officials and practitioners involved in spatial planning and social and economic development across the island of Ireland. We support central, regional and local government in the achievement of policy alignment, capacity building, citizen engagement, and stronger data analysis in decision-making. We work with communities to support the implementation of government programmes such as town and village revitalisation, identifying functional areas and the economic opportunities generated by these spaces, and promoting activities that place a greater emphasis on recognising and building on the potential of places and their people.

We engage in a wide range of activities that inform policy, support transformative change, build capacity, create networks and promote good practice. This is achieved through:

- action research reports, policy briefings, articles and other publications;
- professional education and capacity building programmes that assist local governments and communities to translate policy into ‘on the ground’ action; and
- active outreach and networking that includes conferences, workshops and international cooperation and exchanges to identify best practices.

The ICLRDR is a prescribed organisation in respect of nominations to An Bord Pleanála.