

# **Submission to the first stage of Public Consultation for the National Planning Framework – Ireland 2040 Our Plan**

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## **This submission is made in a personal capacity**

One of the key lessons from some of the past failings of Irish planning<sup>1</sup> is that consolidation of existing city centres and towns should offer the best returns in terms of overall sustainable development. Easy access to goods and services and the ability to walk or use sustainable modes of transport to avail of health, schools, leisure, and cultural facilities are some of the key advantages of living in existing towns and city centres. This is all the more important given the need to cater for an aging population. The points that are raised below relate to specific issues in relation to place making policy in the NPF and the creation of sustainable communities. They relate to the rejuvenation of the cores of Irish towns as places to live, a focus on urban villages and suburban regeneration within our cities and as an adjunct of this a review of rural housing policy.

### **The Irish Town**

Making the centres of Irish towns attractive as a place to live should be a key policy consideration. Small Irish towns have been progressively hollowed out over the past 25 years as development has moved to the edge in large suburban housing estates, or has occurred as single houses in the countryside. Our experience of undertaking town studies on our planning programme reveals multiple examples of this. For example the towns of Bailieborough, Monasterevin, Clara and Monaghan, are all indicative of this trend at different scales. Each of these towns has a fine urban structure and has extraordinary riches in terms of architectural and industrial heritage, yet all are experiencing significant levels of vacancy in their cores. Encouraging people to live in the heart of the Irish town should be something which we strive for.

### **Potential Solutions:**

- Providing local authorities with the resources to be pioneers/catalysts in illustrating how successful conversions of older heritage buildings or

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<sup>1</sup> urban generated housing in the countryside, over production of housing in inappropriate locations, edge development and car dependence on one hand while Inefficient land management in urban cores, a lack of policy instruments to deal with vacancy, and cultural views about 'ideal family homes' lead to our town cores and inner established suburbs declining in population.

vernacular buildings (former shops etc) in Irish towns could be converted for residential living.

- Explore the potential for multidisciplinary town teams linked to community structures integrating the various stakeholder and providing a means to focus on towns and their renewal as places to live.
- Funding to facilitate local authority co-operation with individual land and building owners to come together to amalgamate sites, access backlands etc. all of which might facilitate the conversion of former commercial buildings to residential development.

## **Rural Housing**

One of the reasons for decline of the Irish Town is that for many building a house and living in the open countryside has often been a cost effective option for the individual. However, the construction of urban generated housing in rural areas, often imposes costs on the environment, on infrastructure, on service providers, and on the fabric of towns.

A revision of the national policy on rural one-off housing is thus required. The current policies in development plans are too permissive as is evident from the high number of planning permissions for single houses. For example, between 2010 and 2013 one-off units represented between 30% and 52% of all housing units granted permission each year. There are significant reasons to review current policies e.g. as outlined above the hollowing out of small towns and villages in rural areas, car based mobility and its energy implications, and the constraints that an overly dispersed development pattern has in relation to the provision of other infrastructure for example wind farms. The disadvantages of a dispersed settlement pattern have been well documented in the past but are more urgent now given the national commitments to address climate change and given our aging population. The NPF should give consideration to the adoption of new rural housing guidelines in order to provide congruence between commitments to more sustainable development in towns and villages and planning policy on rural housing.

## **Our Cities**

Our cities will play a key role in the future development of the country, we need a properly articulated urban policy which acknowledges both the role of the urban in Ireland and that we are a largely urban society. It has been long recognized that Ireland has lacked a coherent urban policy (Bannon, 1997), but despite the growth of the urban population and the importance of urban areas to economic development, urban policy has never been clearly articulated in a single policy framework. In relation to the place making agenda the following points are made in relation to the potential of plan led and participative approaches to encourage more sustainable development in our urban villages and established suburbs.

### *Urban Villages and Established Suburbs*

The current hierarchy of plans provides the opportunity for plan led development and provides the framework and context for sustainable development to occur. In our cities, urban villages and our established suburbs are often forgotten in policy terms as the focus is on inner city regeneration. These places provide the opportunity for a form of 'suburban regeneration'. Offering as they do, the opportunity for densification in locales well served by existing public transport and which benefit from existing services, schools, health care local retailing, and leisure activities. They are also the places where research shows that people perceive that they have a good existing quality of life (Douglas, 2016). However, a key barrier to unlocking the potential of urban villages and the suburbs is local opposition to this densification and development. The manner in which local communities are engaged with, and involved in the change in their neighborhoods is crucial.

Existing opposition should not be viewed as irrational or simply NIMBY the reaction is often well founded. Local communities, are often cognizant of the pressures that piecemeal development, or development that is primarily developer driven places on their local area (Scott *et al.* 2012) Local communities fear that green space may disappear, schools will become overcrowded, traffic will increase, schools will become oversubscribed and crèche places will be lacking. These facilities and services are the very things that make these places attractive in the first instance and continued investment in these are important. A key to bringing communities on board may be through the provision of more local Area Plans. These plans and the consultation process that they facilitate, may provide the framework to build the trust between local communities and local authorities, which will allow more sustainable high density development to occur. They can play a role in convincing existing residents that future development that occurs, will be well planned, will deliver gains, and will not impose unnecessary burdens, but will increase the quality of life for both existing and incoming residents. This is the type of active citizenship where communities are participating in the shaping of their local environment.

There are however barriers to this approach. Local Authorities lack the resources both in terms of manpower (planning and design staff) and other resources to invest in the production of LAPs and to engage in the often resource intensive consultation process. It is estimated that these can cost in the region of €300,000 to produce.

### **Solutions**

- Address the need for planning and design staff in house in local authorities to drive these processes in suburbs and urban villages. Particularly in the urban

areas which will be key growth areas under the new National Planning Framework.

- Providing the level of financial resources to local authorities to invest in these planning processes.
- Explore the potential of online engagement and consultation and share best practice among local authorities.

**References:**

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