

Ireland 2040 Our Plan – Draft National Planning Framework

Submission by Dr Warren Whitney

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In this submission, I will simply make a small number of brief comments on the draft NPF.

Firstly, I would like to state that I am broadly supportive of the proposed strategy, although it differs in some ways from what I advocated (notably in spreading growth evenly over the four regional cities and in generally not assigning specific locations for growth elsewhere, other than the concentration on towns over 10,000, though I accept the latter is to be addressed in the RSEs).

Mention of the RSEs prompts the thought that the devil will certainly be in the detail as regards implementation of the NPF, not only as regards the RSEs themselves but also the supporting provisions (e.g. for strategic plans at metropolitan-area or urban-area levels). The role of the Office of the Planning Regulator and the associated legislative provisions will be critical in this regard, but it will also be important to achieve buy-in from local and regional authorities.

The provisions for concentrating development in major centres on infill and brownfield land are reasonable but have the potential to be very unpopular for a variety of reasons, based on experience here and elsewhere (notably the UK). Thus, extreme care should be exercised in their implementation. A clear and non-controversial definition of “infill and brownfield” will be necessary, though I appreciate that using the CSO definition of “built-up envelope” gives some indication. Evidence that the required amount of land can actually be provided from such sources will probably be required in order to gain acceptability.

I would note that there is a risk that advances in technology (including, but not confined to, electric and autonomous vehicles) could be used as an excuse to chip away at the elements of the strategy, and it will be necessary to take account of this possibility in the implementation of the NPF and particularly in any reviews thereof.

Finally, I would like to express my support in general terms for a number of the individual measures proposed in the draft:

- Improved evidence bases for planning for housing provision (NPO 38);
- Metropolitan Area Strategic Plans (NPO 63);
- Urban Area Plans (NPO 64);
- Improved Core Strategy methodology (NPO 65);
- Integration of spatial and transport planning (NPO 66);
- Tiered approach to zoning (NPO 67);
- Order of priority for land development (NPO 68).