



NPF Submissions,
Forward Planning Section,
Department of Housing, Planning,
Community and Local Government,
Custom House,
Dublin, D01 W6X0

National Planning Framework Submission from RGDATA (Retail Grocery Dairy & Allied Trades Association)

RGDATA (Retail Grocery Dairy & Allied Trades Association) is pleased to make a submission to the National Planning Framework (NPF) process.

RGDATA, as the representative body for the independent retail grocery/convenience sector in Ireland, takes a strong interest in planning and development. Our members, who own and operate 3,500 grocery shops throughout Ireland, are a key part of the dynamic that underpins sustainable local communities and have a clear perspective on how planning, at a strategic level should work to support and sustain patterns of living and working while enhancing people's health, quality of life and general wellbeing.

Independent food/convenience shops and supermarkets are a key part of vibrant local communities and vibrant and vital town centres. The members of RGDATA welcome this opportunity to contribute to a vision for Ireland 2020.

The Ireland we would like to see in 20 years time will have vibrant cities, towns, villages and local communities with an independent food/convenience store at their heart. Local entrepreneurship will be encouraged and valued and local small and medium sized enterprises will flourish and provide a variety of full-time and part-time jobs close to where people live.

We will embrace a town centre first philosophy and investment will be directed into smaller cities and towns to revitalise and regenerate them. Empty town centre buildings will have been reimagined to provide residential, commercial, cultural and community uses. Citizens will have access to high speed broadband and a thriving local community with inviting public spaces and excellent transport links.

The National Planning Framework provides an opportunity to set out a plan to deliver on an ambitious vision for a vibrant and vital Ireland and we welcome that it will have high level aims and a strong evidence base.

1. A timely review

The NPF will be a key policy document to guide planning and sustainable development in Ireland over the next 40 years.

The timing for its preparation is extremely fortuitous given that we have been through periods of extreme growth – up to 2007, followed by a sharp economic decline to 2015. The wisdom and folly of previous approaches to how we plan for the future of communities has been very graphically exposed through the experiences of the past decade. In some instances progressive approaches to planning have reduced the potential harmful outcomes of the boom – for example the Retail Planning Guidelines, which have provided some strategic guidance to planning authorities on how retail provision can be properly met within functional areas. In other instances, a failure to follow specific guidance or to entertain speculative development proposals created poor planning and development outcomes.

How we learn from our mistakes and now apply an approach to planning and development which puts sustainability at its heart will determine if we really want to pursue a well rooted and soundly based strategic approach to planning, or if we will revert to short term, locally focused ad hoc planning decisions.

2. Some core principles for a National Planning Framework

RGDATA recognises that the NPF is intended to be a high level strategic document which will provide the framework for future development and investment in Ireland.

As the NPF will be the foundation policy for other initiatives it is vital that the core principles underpinning the vision for Ireland which the NPF seeks to achieve are articulated clearly and strongly.

For example the NPF can play a key role in underpinning urban and rural regeneration by emphasising at the outset a number of core principles which inform and guide the document.

From the perspective of RGDATA members the planning system should operate on a basis that gives full recognition to the following core principles;

- **Recognition of the primacy of town centres as key local hubs for commercial, social, and residential life.** Town centres which demonstrate vibrancy and vitality are attractive and desirable places for people to live, work and visit. They also present an effective and efficient way in which to use public infrastructure resources. Existing urban areas which require regeneration and are underperforming can play a far greater role in helping to fulfil residential, commercial and social outcomes for citizens. Ireland's town centres require a dedicated focus and interventions to bring them back. We need to encourage people friendly centres that are walkable/pedestrian friendly with clear policies regarding car parking. **This should include the introduction of a National Town Centre Management Programme and the inclusion of annual Town Centre Health Checks in the statutory planning process. A National Town Centre Management Unit based in the Department of Housing, Planning and Local Government should co-ordinate this programme and promote and support excellence in town centre management.**
- **A presumption against retail development on greenfield sites out of town.** For a host of reasons, some of which are identified in the Issues Paper, large scale out of town or edge of town retail developments are not sustainable and create negative impacts which run counter to the overall objectives of the NPF.

- **A commitment to greater policy co-ordination and implementation monitoring to give effect to the NPF.** Regrettably objectives of strategic planning guidance can often be frustrated by policy interventions in other areas which distort or utterly contradict outcomes. For example the policy objectives of the Retail Planning Guidelines were, in a number of significant instances, frustrated by the selective implementation of key elements by planning authorities. Furthermore, some policies are adopted by local authorities, specifically around traffic and parking which run counter to the principles underpinning the Retail Planning Guidelines. For example, the operation of strict town centre parking regimes while out of town retail centres are allowed to offer free parking. **The NPF needs to identify and specify structures to ensure that the effectiveness of the NPF is monitored and that approaches or initiatives which are inconsistent with the NPF are identified and stopped.**
- **Evidence and data are key.** For planning authorities to exercise their statutory powers effectively on forward planning and development control, they need to have proper evidence to guide them. Independent, up to date data is crucial to make informed planning decisions. It is important that planning authorities are resourced to gather and retain strong evidence on the health of their town centres and urban areas, independently acquired evidence is crucial if planning authorities are to fulfil their role effectively. Alternatively planning authorities are forced to rely on “finger in the air” statistics presented by developers with a clear vested interest in understating adverse impacts and exaggerating benefits. The addition of an annual Town Centre Health Check to the statutory planning process would ensure that town centre vitality was properly monitored and that all planning interventions could be monitored and assessed.

- **Greenspace is the ultimate scarce resource.** While some new development on greenfield sites will inevitably be required, it is essential that the development opportunities provided by brownfield or existing underused built sites is fully explored. It is also important that planning policy accepts that it is a legitimate objective to retain greenspace between urban areas and that there is no policy imperative to ensure that all greenfield sites at the edge of urban settlements must be viewed as candidate lands for construction projects. Acceptance of such a policy would play a significant role in helping to reduce urban sprawl, facilitate densification of existing urban areas and contribute to a built and green environment which makes Ireland a healthier place to live.

- **Commit to encouraging and facilitating living and vibrant communities.** Planning policies should remain focused on delivering the best possible outcomes for communities. One of the lessons hopefully learnt from the boom was the mistake involved in facilitating development advanced by developers on a speculative basis and without regard for the impact on existing communities, or with inadequate provision being made for any new community structures. All too often large retail developments thrown up at the edge of towns merely diverted trade away from established centres, created additional car borne journeys, contributed to high vacancy rates, dereliction, urban blight, rural decay and the destruction of the self-sufficiency of villages and did not deliver the community gain locals had been promised at the outset.

3. Can the planning system continue to be disinterested about use and function?

From a retail planning perspective planners often contend that they have no role in determining the type of retail outlet or facility that is proposed for a particular location. They point to a well tried mantra that it is not the objective of the planning system to impede innovation or stifle competition. If the NPF is to achieve its objectives it remains questionable whether the planning system can remain agnostic on the specific uses employed in particular buildings or sites. For example, within an urban area there can be a plethora of many versions of a particular retail format with a complete absence of new retail operators that could offer diversity and choice with different types of shops.

Given the challenges from online retail the need for diversity and imaginative, independent unique retailers is essential to continue to encourage footfall and ensure that customers are enticed into town centres and attractive bricks and mortar shops.

The planning system has a role to play in encouraging a retail mix within a town centre. In a shopping centre the centre managers can identify particular types of outlets which are required to complete the retail mix required to make the centre attractive. However in a traditional town centre, the market decides on the retail mix. This does not necessarily lead to the best outcome for the town centre and can often contribute to over provision of one type of outlet or an inadequate mix of formats which undermines the attractiveness of the centre concerned. The current system can also lead to “clone towns” emerging as local retailers find they are squeezed out of the market for space by larger international retailers with larger capital budgets. A vibrant town centre needs diversity and this is not something that can necessarily be delivered by the market alone. The planning system should be capable of giving indicative locational operational preferences without foreclosing or limiting competition or innovation. In fact the system if operated and managed effectively should be capable of generating new competition and sparking innovation.

4. Is the current planning system fit to deliver on a new NPF?

One issue which does need to be addressed in the context of the publication of a NPF is whether the current planning system requires reform or refinement to allow the achievement of the strategic objectives underpinning the NPF. There are a number of instances where RGDATA believes the current planning system requires significant refinement to ensure that a consistent approach is delivered for communities.

All too often the clear guidance given to planning authorities by national policies is set aside when specific applications are being considered at local level. Local authorities are often keen to maximise potential rates gain or development levies, or wish to “seize” a new project ahead of an adjoining authority by demonstrating planning flexibility in applying national guidance. While third parties have a right to appeal to An Bord Pleanála on a specific decision, and decisions are overturned, the better practice would be for the planning authorities to give effect to national policies and guidance rather than to circumvent them at the beckoning of keen developers. **The NPF must include a robust mechanism to ensure that there is consistency in the application of national policies at local level. This is absolutely essential if this Vision for Ireland 2020 is to be delivered.**

In addition, ad hoc changes to Development Plans on land use zonings outside of the normal review of the Plans every five years or applications which seek to set the Development Plan processes aside should not be tolerated unless exceptional conditions are identified to justify changes. The process of material contraventions of Development Plans and mid-term changes to Plans to suit commercial developers should not be entertained, except in very limited circumstances.

RGDATA is pleased to contribute to this consultation process and looks forward to making additional inputs and perspectives as the NPF is concluded. We would be happy to elaborate on any element of this submission.

Tara Buckley

Director General