

# **Fianna Fáil Submission Paper to the National Planning Framework**

## **National Planning Framework – Issues and Choices**



# Submission to the National Planning Framework

## – Issues and choices

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### Overview

Over the next several decades Ireland will reach unprecedented population levels, with demographic predictions that our population will surpass 8 million people on this island by 2040. This is a unique opportunity for the whole of Ireland to put in place a planning framework that will secure a country where people are happy to live, work, study, receive decent public services, play and raise a family.

Long term planning and investment is the cornerstone of achieving a sustainable future. This requires looking beyond short term political demands, to setting out long term goals and charting a clear route forward. In this regard, the fundamental challenge of climate change demands that we plan strategically, in order to ensure we can meet our EU and international obligations while preserving the shared heritage of our environment for future generations.

National strategic planning is a necessity in addressing growing and changing demographic pressures on existing physical and social infrastructure. In this context, the National Planning Framework (NPF) must occupy a central place in our strategic governance. Housing, water services, the road network, public transport, broadband connection, security of energy supplies, the physical framework of healthcare and education provision are critical to how Ireland should look in 2040.

In addition, the role of the NPF must also involve a wider vision of what citizens need to live healthy, fulfilling lives beyond simply providing a framework for the provision of ‘hard’ infrastructure. Sport, leisure, recreational facilities and walkways are also critical in creating a country where people can thrive and prosper. Fianna Fáil will engage fully with the National Planning Framework process as it progresses to help secure a sustainable future for the country.

## **Learning from the National Spatial Strategy**

The National Spatial Strategy (NSS) 2002-2020 was the first ever national spatial planning framework in Europe following on from the European Spatial Development Perspective. The NSS was the inaugural regional planning and development framework in the State, put in place by the Fianna Fáil led government in 2002.

The NSS was an innovative document, which set out high level goals for the long term physical, social and demographic development of the state. The World Bank, IMF, EC and OECD have all been very complementary of the NSS in various reports, which was used as a blueprint by many other developed nations in drafting their own regional development plans.

However, disappointingly the NSS was ultimately undermined by a lack of joined up thinking and coherent planning at both central, regional and local government level. The extent to which the strategy was not fully embedded into national as well as local policy is now fully acknowledged. The economic crisis further compounded these fundamental problems, as did the premature abandonment of the Strategy by the 2011-2016 government.

However it is misleading to suggest that implementation of the NSS strategy was a complete failure. The NSS led to the development of a new evidence base that has gone a long way to enhancing policy and political understanding of the dynamics of local communities, their economies and the conditions that underpin success or stagnation. As a result of the lessons from the original NSS, there is now a clearer understanding of the trends, positive and negative, which influence social and economic characteristics on the Island of Ireland.

The strategic thinking in the NSS was driven by the objective of developing the socio-economic 'potential' of areas across different regions. This was a significant conceptual innovation in the NSS, replacing more traditional methods and locally focused perspectives. We firmly believe that if spatial strategies are to help a region achieve its potential, there is a need to be cognisant and mindful of both historical identities and the reality of how people and communities function.

Undoubtedly, the scrapping of the NNS by Minister Hogan in 2012 was one of the many appalling bad choices made by that government. The decision was especially reprehensible as it was made just as the regional authorities were placed on a stronger statutory platform. This party political decision displayed a complete disregard for the national planning process and has created a great deal of uncertainty in the regional and local planning process since.

It is vital to the future success of the future National Planning Framework that the lessons of the NNS are fully learnt and are implemented. Developing a comprehensive, holistic and integrated approach will be the key consideration, to a NPF that delivers sustainable communities, vibrant economies and attractive quality of life across Ireland.

### **National Infrastructure Commission**

To help achieve that holistic approach, Fianna Fáil has proposed that a new National Infrastructure Commission tasked with planning ahead over a 25 year period beyond the limited 5 year cycle of current capital plans should be established. This would be set up by reforming Transport Infrastructure Ireland and drawing from the Department of Transport, National Transport Authority, Sustainable Energy Authority and Local Authorities and it should set out a new framework for the development of transport in Ireland over the coming years. The commission should be tasked with overseeing long term plans for a series of targets. These include:

- Achieving 4% of GDP Infrastructure Investment
- Decarbonising Ireland
- Creating a strong transport network that balances regional development
- Making Ireland an IT nation with telecommunications connectivity
- Securing a balanced energy mix

In our view the work of the Commission should adhere fully to the objectives and targets set out by the National Planning framework and share the same time frame space.



The Commission's reports should be laid before the Oireachtas and subject to scrutiny. Government departments will be required to draw up plans based on the Commission's recommendations as passed by the Oireachtas.

## **Balanced Regional Development**

The NPF must take a balanced regional perspective on the future development of the country. This means developing the potential of areas that can act as economic counter weights to the increasing dominance of Dublin.

In applied terms, the aim of the NPF should be to enable growth across all regions while reducing regional disparities. While there have been criticisms of the concept of 'balanced regional development' as being too diffuse, we believe the concept of reducing regional economic disparities while not hindering across the nation growth is well-defined and measureable. In practice it means achieving growth in all areas, but attempting to reduce the share of national growth concentrated in high growth areas, such as the Greater Dublin Area.

While there has been much debate within regional policy in Ireland about the apparent trade-off between regional equity and national growth, it is clear that there is need for both. Our view is that, far from there being such a trade-off between growth and equity, more balanced regional growth will benefit the whole country rather than just concentrating on the Dublin and greater Leinster area.

Fianna Fáil is worried about certain nuances and language in the government's 'Ireland 2040' consultation document for the NPF on 'hard choices' and 'selectivity'. Such language is consistent with a view of 'New Economic Geography' perspectives in regional planning, which often creates a false dichotomy between spatial equity and national output, often advocating for managed decline in peripheral areas.

Much of the language Minister Coveney has used in connection with the NPF also confirms our concerns that this perspective is guiding the development of the new national planning framework. We have grave reservations that such a vision will

pervade the NPF and believe that such a vision could lead to the pursuit of policies that would be harmful for much of the country.

For instance if, as has been reported, the NPF's approach to regional development policy will be to solely designate existing large Cities as growth centres, there will be nothing in whole North-West and Midlands of the country. While a focus on existing Cities might be a good sound bite to the media, it would leave one third the geographic area of the country with no designated growth clusters.

Such a regional plan would not be reasonable or ambitious. In actual fact, it would send a message to the populations of the Midlands, the West and North West that the government has no hope for bolstering growth in their regions and is effectively giving up on them, with the exception of tourism. This is not and would not be acceptable.

Fianna Fáil's view is that, in fact, reducing regional disparities would not entail a negative impact on aggregate output in Ireland, or in high growth areas like the Greater Dublin Area (GDA). Reducing disparities would, by contrast, have a positive impact on national growth and make overall growth more sustainable.

We believe – and this is supported by international evidence on regional growth disparities – that at Ireland's high level of development reducing economic disparities should have a positive impact on overall national economic output.

This is a powerful argument and we believe it should be at the heart of what the National Planning Framework is trying to achieve.

Reducing disparities will also improve economic efficiency and productivity in the GDA. In fact, we believe that without an effective plan to foster economic growth in other regional cities and towns, the GDA will suffer lost output due to problems of congestion in housing, transport and other areas.

Congestion - in terms of slower, back-logged public transport and traffic jams, for example - is, to a certain extent, a sign that more people have jobs to get to. However, while higher levels of congestion are initially associated with faster

growth, above a certain threshold, congestion starts to become a drag on economic activity.

Within Dublin, as employment increases towards the levels last experienced in 2004-2008, we will approach this threshold where traffic congestion will have a substantially negative affect on people's daily lives and on economic movement. After a certain point, traffic congestion also becomes a drag on growth, productivity and job growth.

Physical, social and educational infrastructure should be developed in other key cities to allow them to thrive as engines of growth.

Improved and more responsive local governance will also play a key part in fostering growth centres. In this regard, Fianna Fáil has also proposed a new Directly Elected Mayor model to help provide leadership to these cities. The roll out of Broadband is the key technological development in enabling business in rural Ireland to develop. It is also a socially critical piece of economic infrastructure to connect homes to the country's cultural and social life. This will become ever more important over the timeframe of the NPF.

The goals of the NPF must be to ensure that the whole of Ireland benefits from future economic and demographic growth. An over reliance on Dublin at the expense of the rest of the island is economically, environmentally and socially unsustainable for the GDA as much as for other Regions.

## **Fostering Economic Growth**

The role of the NPF must also be to help encourage further investment in the island from both a Foreign Direct Investment perspective and facilitating the growth and development of indigenous businesses. Linking population growth and infrastructure investment combined with a renewed focus on quality of life will play a critical role in attracting and retaining businesses.

The key drivers of regional economic growth identified in the economic research literature are innovation, human capital, trade, infrastructure, availability of finance



and social capital. Increasingly economic growth in highly developed countries like Ireland depends on development of services and high tech industry, which in turn display a strong tendency to locate in large urban centres providing access to skills support services and appropriate infrastructure.

Therefore, the economic potential of the regions outside of the GDA will depend on their main urban centre's ability to stimulate or attract investment in such activities. This will mean the focal growth centre in each region acting as a gateway through which the region's interactions (including its flows of goods, people, money information etc.) with the other regions and directly with the outside world, are channelled.

By strengthening the links between growth centres in each region and their hinterlands, the aim is to create a set of coherent and sustaining regions with more self-reliant integrated economies where people can find high skill employment and live.

This vision of so-called 'Balanced Polycentric' regional development involves cities or towns in less developed regions pursuing a more self-reliant development path, rather than as primarily being residential hubs for larger employment centres, such as Dublin.

In terms of industrial development policies, where the NSS focus was on encouraging economic specialisation in regions and around particular gateways, there is much economic research which suggests that this is in fact a misguided focus for regional development policies, as the benefits of specialisation are limited. By contrast, economic resilience within regions is fostered by having a diversity of industrial and commercial activities in a particular area, rather than striving for specialisation.

In rural Ireland technological advances will continue to allow more diverse economic activity. Investing in adequate broadband will be critical to keeping rural communities' alive and prospering. While the traditional focus of policies aimed at regional economic convergence has been the provision of 'hard' infrastructure, as well as assistance to firms in more peripheral areas, on their own these policies are unlikely to increase the competitiveness of lagging areas.

To develop high skill employment in regional growth centres, the focus has to be on supporting education, research and on human capital development. The role of Institutes of Technology – and potentially of Technological Universities – in having an enhanced role in their regard should not be underestimated.

We believe that a much grander vision is required for IoTs as regional centres fostering high skilled and applied links with local businesses, research spinoffs and talent pools for FDI firms. Importantly it should not be the objective of government policy to remove these venerable local higher education institutions from the regions in which they are embedded. Fianna Fáil believes that the strengths of IoTs have to be fostered and valued for their benefits to local industries and the development to regional human capital.

## **Hierarchy of Plans**

The NPF will be a statement of the government’s objectives for Ireland’s spatial development and will form the top tier of the planning policy hierarchy. The hierarchy of plans is the central pillar to uphold the entire planning process. Ensuring that the tread connecting one plan to the other is sustained and fully implemented must be subject to on-going review.

In this regard, the goals and objectives of the NPF must be clearly understandable so that the tiered plans are cohesive. The legislative powers underpinning this connection must to ensure it is upheld effectively. Hierarchical planning, stemming from the European Spatial Development Perspective to Local Areas plans must be fully adhered to.

If the future planning framework to deliver on its mandate, it will have to be aligned closely with other plans, such as the Capital Plan 2016-2021, as well as various regional transport planning documents, such as the Transport Strategy for the Greater Dublin Area. Unfortunately, as of yet, there is no evidence that this will be the case. These plans were unfortunately drafted in virtual isolation of the national planning framework.

## **Independent Planning Regulator**

The new independent planning regulator must be at the heart of holding the hierarchy of plans to account. Ensuring that each layer of plans is compatible and complementary to the other is fundamental to the overall success of the system.

The regulator, working in conjunction with the Minister, must be adequately resourced to hold the hierarchy in place. The implementation of the NPF should be subjected to on-going parliamentary review and scrutiny including the range of powers and resources at the disposal of the Regulator.

Fianna Fáil has repeatedly requested the implementation of the Mahon recommendations on improving transparency, consistency and good decision-making throughout the planning system. It is vital that we continue to put in place the recommended legal and institutional framework.

We believe that proposals for the new Office of Planning Regulator to oversee and assess decision-making and process in planning authorities strikes an appropriate balance in giving the new Office independence in its role, evaluating local and regional development plans while maintaining some democratic control over the body by the Minister and the Oireachtas.

However, we have a number of concerns about the large omissions in the proposals to reform the planning system in the Planning and Development Amendment Bill 2016, including many of key Mahon recommendations for improving transparency in planning such as the disclosure of political donations by planning applicants and the noting of all submissions by political representatives on planning applications.

We also believe that some of the OPR's functions and powers prescribed by the Bill may not make it an effective overseer of the national planning strategy. It is given no role in overseeing executive transport planning agencies, including the NTA and TII.

Since one of the rationales – given by Mahon – behind establishing the Office of the Planning Regulator (OPR) is achieve greater integration between land use planning, such as local authority zoning decisions, and strategic transport planning; it is

disappointing that the new Office is not given any role in overseeing the development or implementation of plans by the NTA or TII.

There are also some concerns that the limitation of the OPR powers as prescribed in the Bill may make it toothless an anti-corruption watchdog in the planning process. The OPR should be able to prevent planning abuses in real time, and should be given powers to strike down particular planning decisions that it considers to be corrupt or contravening proper planning process.

One of the central functions of the new Planning Regulator will be to ensure a more consistent approach to the handling of planning applications across local authorities.

This is very important to help ensure that there is a relatively consistent approach to planning proposals taken across planning authorities. Consistency in the interpretation of development plan policies is essential if public confidence in the planning system is to be maintained.

## **Whole of Government Approach**

A coherent planning framework has to integrate the various strands of government policy into a coherent whole. This means adapting a whole of government approach rather than a silo driven approach, characterised by a fragmented department-by-department policy.

Capital Plans must adhere to the vision set out by the National Planning Framework to ensure investment is matched up with the designated areas and focus of growth. Internal Departmental plans must reflect the broader objectives laid out by the NPF.

Alignment of departmental plans to the National Planning Framework is of vital importance to it delivering on the ground.

## **All Island Approach**

Brexit further underlines the importance of developing an all Island approach to long term planning. The island is acutely exposed to the hard edge of Brexit and needs to



be able to work together to mitigate its worst consequences. The NPF must work in tandem with the Regional Development Strategy 2035 which charts out the path forward for Northern Ireland.

Aligning with spatial plans for Northern Ireland and utilising the institutional framework established by the Good Friday Agreement and subsequent documents will be vital to fully leveraging the overall potential for the whole island.

In the context of our vulnerability to Brexit this is more important than ever.

### **Addressing Climate Change**

The National Planning Framework is an essential tool in Ireland's efforts to decarbonise and meet our EU and international obligations. It must be a core guiding principle of the NPF in targeting population growth, creating sustainable communities and fostering and encouraging public transport use.

Achieving critical mass in key cities and urban centres, supporting sustainable building practices and maximising the use of public transport are indispensable to that goal and fostering sustainable development in rural Ireland.

The NPF and subsequent plans that flow from it must be focused on tackling this existential challenge.

### **Meeting Housing Demand**

The importance of housing is recognised in the NSS, which reflects the fact that people require housing and so the supply and demand of housing is a key factor in determining settlement patterns. However the strong link between housing costs, incomes and household formation was not adequately recognised. One of the core objectives of the NPF will have to be putting in place limits on sprawl and on the dispersion of settlement patterns around large urban centres.

The degree to which this happens depends crucially on zoning, the incentives to develop brown field sites and other development incentives.

National Housing Strategies that underpin the NPF should focus on brown field development. For example, the massive unused potential 'Above the Shop' spaces – which exist in huge numbers across Cities and Towns – can be converted for use as housing.

The NPF should also involve strategy for encouraging the more central location of employment and commerce. Currently the disjointed approach across government encourages the hollowing out of town centres. For example, commercial rates including the system for valuation, has a role in encourage the central location of businesses.

Where people live is one of the most basic of human needs and is an integral part of the quality of their lives. The expected increases in population and subsequent pressure on our infrastructure will be most acutely felt in the area of housing. This will also be exacerbated by the proliferation of household formation.

This is why it is essential that population increases are targeted into sustainable communities on the basis of plan-led as opposed to development-led construction. Balancing the need to focus growth in cities and urban centres to achieve critical mass while ensuring fresh life is breathed into rural Ireland is a major challenge for the plan to confront and address. We believe that whether or not this is achieved will be one of the single most important tests of the success of the National Planning Framework.

Meeting lifecycle requirements from students to the elderly must also be recognised in the plan. Our planning framework must be able to facilitate and people who have and rise active families. A sense of place and belonging is a positive feature of Irish life. As such, it is important that plans work with local identity rather than been seen to impose top down solutions.

## Transport Planning

While it is true that both the TII and NTA are bound statutorily to ‘have regard’ to higher level master plans, such as the National Spatial Strategy (NSS) or Regional Planning guidelines, very often there is lack of coherence or even disagreement – whether it is perceived or real - between Local Authority Development Plans and regional transport strategies developed by the NTA and TII.

While it is acknowledged that public transport, rail in particular, requires critical densities within a short distance of rail lines to operate effectively, there is often little recognition within NTA public transport strategies that rail and bus services can also play a reciprocal purpose in land use policies, by encouraging growth in key population centres. The history of the Irish Railway network, in particular, is testament to rail services’ ability to encourage critical population densities to develop along rail lines.

Since one of the rationales – given by Mahon – behind establishing the new Office of the Planning Regulator is to achieve a greater level of integration between land use planning, such as local authority zoning decisions, and strategic transport planning; it is disappointing that the new OPR is not given any role in overseeing the development or implementation of plans by the NTA or TII. For the Greater Dublin Area Transport Strategy, for example, local authorities and representatives in Wicklow, Kildare and Meath voiced concerns that the NTA was setting the rules on spatial planning, without due consideration to their regional and county plans.

It seems, from government proposals, that the role of the OPR will be to ensure there is coherence/ agreement on the part of county development plans and local area plans with regional transport plans developed by the NTA and TII. However it should also be recognised that bodies such as the NTA or TII, despite having a statutory obligation to comply with the NSS and regional guidelines, may not always make decisions that are consistent with regional planning guidelines. And in addition, there should not be an assumption that it is local authority development plans that are inconsistent with regional plans or national plans.

We believe a better approach would be to give the new Office of Planning Regulator the role as arbitrator between local authorities and bodies such as the NTA or TII, where disagreement arises over draft plans. When a local authority is of the belief that specific decisions by the NTA or TII run contrary to Development Plans, such complaints should be given an airing by the OPR, not simply cast aside.

## **Implementation, Measurement and Monitoring**

Key to the success of the National Planning Framework is an effective monitoring and implementation process. This must also be founded on full democratic accountability.

A NPF implementation team and Independent Planning Regulator should publish an annual report to be laid before the Oireachtas for review and debate. Empirical measurement and quantification of the benefits of the NPF and its instruments would encourage greater levels of local buy-in and public acceptance to the national plan.

The annual report must be based around objective, verifiable data across the key targets of the plan. Regular engagement with the relevant authorities in Northern Ireland with regard to their implantation of long term planning must also be part of the monitoring and implementation process.

The report should also issues recommendations on outstanding areas or legislative weaknesses that need to be addressed in order to help guide debate around its implementation.

## **Conclusion**

The National Planning Framework will be central to achieving sustainable development on this island over the next quarter of a century. It is vital that the plan has a whole of government buy in and is fully engaged with by lower tiers of governance. In particular, on-going review of the plan on the basis of evidence and tweaks to ensure effective implementation on the ground will be critical to its success in achieving its objectives. Otherwise, the document risks being condemned to gathering dust on the bookshelves as opposed to the core, guiding framework of the physical development of the country.