



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

9th November 2017

County and City Management Association submission on the National Planning Framework (Ireland 2040 – Our Plan)

This letter is submitted on behalf of the County and City Management Association (CCMA), it will be supplemented by separate individual submissions covering matters specific to each Local Authority.

The County and City Management Association welcome and support the development of the National Planning Framework (NPF) and welcome the opportunity to contribute to the consultation process.

The draft Plan is positively received in respect to:

- The 8 principles that underpin the Ireland 2040 vision (pg 27)
- The link between the National Planning Framework and the National Investment Plan
- Making real efforts to ensure our regions experience population and economic growth
- Its strong objectives in relation to bringing jobs to the regions
- Its strong policies to enhance our city, town and village centres

Notwithstanding Local Authorities' broad support for a national planning framework, at a strategic level there are concerns that the current draft Plan falls short in a number of areas.

The draft Plan appears not to include the economic research and forecasting analysis (referenced in Dec 2015 Roadmap for the NPF) that supports the mechanism to "shift from projected trends" and to "redirect growth" to achieve Regional Parity, this undermines confidence in the viability of the draft Plan and the capacity to make informed submissions. The National Spatial Strategy 2002-2020 developed a vision that was not realised. It is critical that there is understanding from the outset of the choices that are being made for the NPF so there can be confidence that it can / will be delivered. Local Authority's request that this analysis be released and time is allowed for informed comment to be made.

While the draft Plan has moved away from gateways and hubs, the Urban Settlement definition used in the draft Plan and the mechanism for attributing future growth to smaller towns and villages as a percentage of an overall growth figure is considered overly prescriptive. A less numeric approach with a greater emphasis on the specific place with a carrying capacity based methodology to



accommodate growth would be welcomed; the NPF is an opportunity to set down these criteria. Consideration should be given to Regional Assemblies having greater flexibility to distribute the growth across cities, towns and villages within their region, informed by the criteria set by the NPF, thereby providing flexibility within a clear set of parameters.

While in the issues paper concerns were raised regarding what can be described as ‘donut’ development around Dublin, the Plan, as currently drafted, creates a national donut with the 5 cities (6 including Dundalk/Newry) leaving the Midlands and the North West without the support of strategic policy direction for future growth and investment.

In addition to Local Authorities being concerned by the methodology for distributing growth, the growth projection is considered conservative. The projected growth of one million people by 2040 does not appear to align with the ESRI report “Projections of Demand for Health Care in Ireland, 2015-2030”, which projected a million extra people by 2030. Due to the Strategic Nature of the Plan

it is critical that flexibility is built into the Plan so that if growth is greater than anticipated or if Regional Parity takes longer than envisaged by the Plan there is capacity for this growth to be accommodated in a sustainable planned manner.

The importance of Dublin as a national economic driver is recognised by all. The plan should put greater emphasis on the Dublin competing in the global market to attract investment rather than it being in competition with other parts of Ireland. Enhancing Dublin’s ability to successfully compete with other international economic capitals is critical to the continued development of Ireland itself.

Employment growth is critical for all regions, employment growth should be linked with delivering smart economic growth – it should not be curtailed by population growth figures. It is somewhat contrary to expect jobs to follow population where experience has shown that people have followed jobs. Where in the past the State has invested heavily in providing serviced lands for jobs growth the return on this investment should be maximised.

Climate change is a primary driver in shaping the thinking on how Ireland develops and how we play our part in what is a global phenomenon. The Plan currently does not adequately emphasise the link between sustainable development and addressing climate change at the outset of the document.

The draft Plan proposes Metropolitan Area Strategic Plans but we believe that, greater clarity regarding the Governance of both the drafting and the realisation of these Metropolitan Plans is required. It is critical that Local Authorities whose jurisdiction these Plans cover have a clear role in leading the preparation, adoption and realisation of the relevant Metropolitan Area Strategic Plans.

The purpose of the wheel on page 77, titled Hierarchy of Development and Related Infrastructure, needs to be clarified. It is considered that this should be indicative of best practice and not prescriptive.

Local Authorities welcome the fact that the draft Plan acknowledges its role in harnessing our oceans wealth in the chapter dedicated to Realising our Islands and Marine Potential. The fact that the framework and the ten-year National Investment Plan are being published in the absence of a Marine plan severely impacts on the coordination and co-dependency of the NPF and the marine

agenda. On the publication of the Marine Plan a mechanism should be put in place to evaluate both. Leaving this process to the RSES may result in unintended consequences. Finalisation of the Marine Plan should automatically trigger a review of the NPF and subsequent plans in the hierarchy. Such mechanisms would copper-fasten the NPF as a living document.

The Draft Plan moves from being a strategic policy document to matters of detailed implementation, the National Planning Framework is not considered the appropriate document for this. This should be addressed by way of separate Section 28 Guidelines and possibly legislative changes. A separate opportunity should be given to have proper consultation on the implications of these significant changes:

- Objective 11 – performance criteria
- Objective 67 – infrastructure structure costs & identification of responsible agencies
- Objection 68 – evidence of landholdings commitment to co-operate
- Section 9.3 Funding projects that deliver on the policies of the NPF through competitive bids appears to underline the Plan – while the funding is welcomed it should be based on accordance with Regional and National Plans and not competitive bids.
- Appendix 1 – Methodology for tiered approach to land zoning
- Appendix 2 – Methodology for the prioritisation of Development Land

The Department is requested to remove these sections from the draft National Planning Framework and should consider replacing it with a statement of intent to review Plan making processes and strengthening Planning's role in active land management to deliver Development Plan Policies. Local Authorities would welcome the opportunity of working with the Department on these Guidelines.



Conclusion

This Plan is a complex document with many positive policies and objectives but also includes areas that require further consideration.

The need for the reader to drill down into the figures to understand growth projections and the lack of maps illustrating the distribution of that growth at a National, Regional and Metropolitan level makes the document somewhat inaccessible and not particularly user friendly.

Local Authorities would welcome the opportunity for further engagement on planning for future growth, providing more flexibility within a clear set of criteria, rather than the prescriptive approach adopted by this Draft National Planning Framework. This engagement should occur prior to the adoption of the final Plan.

For and on behalf of the CCMA

Peter Hynes

Chairman of the CCMA Land Use & Transportation Committee

County and City Management Association
Office for Local Authority Management (OLAM)
Local Government House
35 – 39 Ushers Quay
Dublin 8