

Dear Sir/Madam,

My name is Roy Harford and I'm a Regional & Urban Planning student in UCD. I wish to make the following submission to the public consultation for the Draft National Planning Framework, particularly in relation to the Metropolitan Area Strategic Plans, and the integration between transport and spatial planning.

Metropolitan Area Strategic Plans

The proposed Metropolitan Area Strategic Plans (MASP's) are a positive addition to the planning system in Ireland, and should help to promote more coordinated planning in the best interests of the overall metropolitan areas. However, in order for them to be effective, it is important that they can provide a sufficient amount of guidance for development plans and local area plans to follow.

The draft NPF does not explain how these MASP's are intended to address urban sprawl and uncontrolled development in a metropolitan area's hinterland. While it is understandable that these plans should not be too prescriptive and zone individual land, they should provide some level of guidance as to where development should take place. It is important to note that there is a lot of inconsistency between different county/city development plans and the way that they zone land. For example, Fingal has a very comprehensive zoning system for the whole county, which includes a significant green belt, while Meath only zones individual towns and appears to have no provision for a green belt.

These MASP's should zone an indicative green belt around their respective cities, to provide guidance as to what areas should be protected from development. Within the green belt, these plans should identify main settlements, where development should be focused into. While it should be up to the development plans to determine the extent of each settlement, they should be required to ensure that the identity of each of these settlements is protected, and prevent the amalgamation of settlements with each other.

This approach has already been used to an extent in the Cork Area Strategic Plan, where a green belt has been identified around the city, and individual settlements, primarily focused on rail stations, have been identified as suitable areas for development. The identity of each settlement is protected, by allowing the green belt to separate them from each other and preventing any amalgamation. The image below shows an extract from the Cork Area Strategic Plan:

Figure II Structure Diagram for Metropolitan Cork



National Policy Objective 63 currently states:

Provision will be made for metropolitan area strategic plans to be prepared for the Dublin, Cork, Limerick, Galway and Waterford Metropolitan areas and in the case of Dublin and Cork, to also address the wider city region, by the appropriate authorities in tandem with and as part of the relevant RSES.

It is requested that the following should be added as an extra paragraph to this National Policy Objective:

These plans will designate an indicative green belt around their respective cities, and will identify individual settlements within this green belt. City and County Development Plans will be required to protect this green belt from sprawl development and to direct development into the city and the identified settlements. They will also be required to protect the identity of individual settlements within the green belt, and to prevent their amalgamation with each other.

While the MASP's will likely include this approach anyway, including it within the National Planning Framework ensures that the MASP's can work effectively in managing the development of their metropolitan area, across all administrative boundaries.

Statutory Arrangements between Spatial and Transport Planning

National Policy Objective 66 currently states:

Statutory arrangements between spatial and transport planning in the Greater Dublin Area will be extended to other cities

It is questioned why this is only being extended to the other four cities, and not to the entire country. Integration between spatial and transport planning is important for all areas, whether that is cities, towns, or rural areas. It should be noted the Greater Dublin Area covers an extensive part of the country, including all of counties Meath, Kildare and Wicklow, and as these statutory arrangements apply to the entire GDA, they include not only the city, but an extensive number of towns and rural areas. It would appear to be logical that these arrangements should be extended to encompass the whole country, and not just restricted to the five cities.

The Draft National Planning Framework specifically focuses on the role of the National Transport Authority (NTA) in preparing a Transport Strategy for the GDA, and while it is understandable that full transport strategies similar to this may only be required in the five cities, there are many other differences between the NTA's role within and outside the GDA. For example, within the GDA the NTA, according to their website, "submits observations on all County, City and Town Development Plans, Local Area Plans, Strategic Development Zone planning schemes, large scale planning applications and other matters which may be of interest in transport terms". Outside the GDA, their statutory remit is limited to the Regional Planning Guidelines only, although "from time to time, the Authority is also invited to formally submit observations on more detailed planning matters".

The NTA already carries out a lot of work across the country in planning and providing public transport services, and has particularly done a lot of work in recent years in improving the rural transport programme, now branded as Local Link. It is important that their work in providing transport services can be supported by coordinated spatial and land use planning across the country also. There is no reason why the NTAs role in spatial planning should not be put on a statutory footing for the entire country.

It is requested that National Policy Objective 66 should be revised to state:

Statutory arrangements between spatial and transport planning in the Greater Dublin Area will be extended to the rest of the state. Statutory transport strategies will be prepared for the metropolitan areas of the 5 cities, and for any other areas deemed appropriate by the NTA.

While they should only be required to prepare detailed transport strategies for the 5 main cities, it should be within their remit to prepare statutory transport strategies for all other areas, where they consider it to be appropriate, and they should be a statutory consultee for all Development Plans, Local Area Plans, and major planning applications across the state.

Statutory Arrangements between Transport Infrastructure and Spatial/Land Use Planning

In addition to the National Transport Authority, already mentioned above, the role of Transport Infrastructure Ireland (TII) in spatial and land use planning should also be recognised too. TII is responsible for the delivery and management of motorway and national road infrastructure across the country, as well as light rail infrastructure and operations. However, while it has such an important role for transport across the, its remit in relation to spatial and land use planning is quite limited.

TII has little statutory powers to create its own policies, and its role as a statutory consultee on planning applications is limited to commenting on the impact that a proposal could have on the safety or capacity of the national road network. As the national body responsible for national road infrastructure, there are many other issues planning related issues which it should have a remit in.

For example, in 2014 TII (then the NRA) published a Service Area Policy, to guide the development of services areas across the national road network. This policy considered both on-line public funded developments and off-line private developments, however it had no statutory footing or real influence on private developments, for which there have been a significant amount of applications in recent years. When commenting on planning applications, TII's submissions focus only on the impact of a proposal on the safety or capacity of the national road network, and do not consider whether the proposal is a suitable location for a service area or not.

The lack of any statutory guidance for issues like this has resulted in very inconsistent decisions by both planning authorities and An Bord Pleanála, particularly in relation to what is considered to be a suitable distance between service areas. In one application for a private service area development on the M18, the An Bord Pleanála Inspector even incorrectly based their recommendation on a TII Site Selection Report for an Online Service Area, which was completely unrelated and irrelevant to the application, and had not been provided by TII in their submission.

It is requested that the remit of Transport Infrastructure Ireland is expanded, to allow it to set its own statutory policies, and to comment on all relevant planning issues when making submissions on planning applications.

Thank you for your consideration,

Kind Regards,

Roy Harford

UCD Planning Student