

DIT Environment & Planning

**Submission from the Academic Staff
to the National Planning Framework Stage One**



Comhshaol & Pleanáil, ITBÁC
DIT Environment & Planning

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

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A Chara,

Submission to the National Planning Framework 2040

We are members of the Academic Staff and Researchers of DIT Environment & Planning. We are pleased to make this submission, each section of which was prepared by one of our members. We hope it may be helpful to your considerations for the NPF 2040 process, stage one.

We wish you every success with the process.

Le meas,

David O'Connor, on behalf of the contributors

Ciaran Cuffe

Conor Skehan

Dara Carroll

David O'Connor

Helen Murray

Dr. Ken Boyle

Dr. Marian Coll

Odran Reid

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Cllr. Ciaran Cuffe: The Importance of Existing Urban Centres for Growth

I suggest that the proposed National Planning Framework stresses the importance of existing urban centres for growth in employment and population.

The significant growth of Dublin in recent years appears to have been aided by the significant residential growth in the inner city over the last thirty years. If this success can be repeated in regional towns and cities, it can be a win-win for all concerned along the following lines:

- Older buildings can be re-used for new uses
- Long-distance commuting will reduce
- Urban areas will become more vibrant
- Carbon emissions will be reduced

It is also important to stress that significant capital investment must be targeted at pedestrian and cycling measures in order to improve road safety, and the quality of life in these areas.

Ciarán Cuffe, BArch MRUP MRIAI MIPI MRTPI AoU

Conor Skehan: Devolution of functions will be critical for the Implementation of the NPF

Implementation will be critical if the NPF is to succeed. This means that governance must be considered as an integral part of the Framework. Existing models will need to be re-evaluated to ensure that they are fit-for-purpose. More fundamentally – the content and structure of the NPF is highly dependent on the implementation vehicles of governance – national, regional and local. This note makes the case that a review of governance should be an integral part of the NPF.

The principle drivers of change over the NPF Period are likely to be demographic and governance. While much attention is paid to the former, little attention has been paid to scenarios in which there are significant changes to systems and standards of administration. Public servants are, rightly, reluctant to speculate on issues such as changes in administration and governance – this must not be allowed to hamper effective scenario development for the NPF.

Much of the efforts to address perceived ‘imbalances’ between the eastern and western regions appears to overlook the effect of Ireland’s highly centralised State. This fact combined with the need for significant funding transfers to peripheral rural areas means that very significant parts of the control over the future of regional and rural areas does lie within these areas.

As a result, rural Ireland often feel frustrated by “Dublin’s deafness” to their needs. Rural Ireland mis-directs its frustration towards Dublin, when the real issue is the lack of devolution of functions. Devolution refers to the transfer of power from central government to local government.

Centralisation creates very significant delays and additional costs in a modern economy. Worse, it significantly suppresses and frustrates local leadership in economic and social development.

Ireland is Europe’s least devolved State and changes to administrative systems – and associated planning – are overdue and have a high likelihood of occurring during the life of the NPF. Such changes to ‘internal’ systems will interact with a very volatile ‘external’ environment – principally due to Brexit and increasing nationalism – both with the EU and the US.

Local Government in Ireland spends only 5%, while in the EU-15, they spend 46% of total government spending. A 2008 Council of Europe report on Ireland’s found that, despite many reports and promises of reform, Ireland continued to have “excessively centralised” government by international standards.

It is universally recognised that outcomes improve the closer a decision is made to where the effect occurs. Killarney is a better place than Kildare Street for making decisions about Kerry.

Many Irish people are unaware of how different our local authority system is compared to the rest of Europe – where a wide range of public services are provided by the equivalent of the County Council. Throughout the EU it is normal for the local authority to have the main local delivery role in education, transport, energy, water services, policing, sports and – most critically – enterprise, employment and social services.

Since the foundation of the State, we followed the opposite path. Since 1922 the following functions were lost by local Irish local authorities - education, health, national roads, planning appeals, waste services, water services, environmental protection. Every 'reform' seems to transfer more power to the centre – as we have seen with the Irish Water recently.

The enemy is centralization. Ireland's battle is not to control Dublin, it is to wrest control away from a political system and a public service that are controlling, micro-managing and fiercely mistrustful of ceding any power.

All previous assessments of Ireland's governance over the past 25 years have identified over-centralisation as the main performance inhibitor of central government. Assessments since the Barrington Report of 1991 have recognized the lack of reform - compared to Europe - and the resultant congestion of central government by its obsession with operational rather than strategic matters.

The Second Report of the Devolution Commission in 1997 recommended significant devolution of fiscal, functional and implementation roles to Local Government. The 2008 Putting People First initiative has put many structures in place to facilitate devolution. The NPF needs to complete this work.

Ireland is entering a period of great change – driven by forces outside of our control. The regions, Dublin and Northern Ireland are all going to drive the need for independently functioning regions to deliver better outcomes.

The role of Governance must be acknowledged as being critical for the successful implementation of the NPF - a review of governance should be an integral part of the process.

Conor Skehan is a lecturer in DIT

Dara Carroll: Nature-Based Solutions and Green Infrastructure for Sustainable Urban Planning

Towards a National Planning Framework (Section 5) acknowledges the value of green infrastructure along with cultural assets as defining elements of the attractiveness and competitiveness of both urban and rural places. The Irish Sustainable Development Council Comhar defined green infrastructure as an interconnected network of green space that conserves natural ecosystem values and functions and provides associated benefits to human populations.

Services that green infrastructure can deliver include clean air, temperature control and mitigation of the local 'heat island effect', recreation areas, flood protection, rainwater retention and flood prevention, maintenance of groundwater levels, restoring or halting the loss of biodiversity, improving the health of citizens, and enhancing the quality of life in general, including by providing accessible and affordable areas for physical activity. Green infrastructure is thus delivering what are termed Nature-Based Solutions, defined by the European Commission as actions inspired by, supported by or copied from nature.

Ireland, as elsewhere in the Europe, is becoming increasingly urbanised, with consequent environmental and social pressures. An extensive body of research reveals the connection between public health, well-being and nature, however, it also reflects concerns that urbanisation is quantitatively and qualitatively diminishing possibilities for human contact with nature. This may be particularly acute within impoverished, inner city neighbourhoods.

As the nexus of knowledge, infrastructure and governance, cities represent a key opportunity to stimulate larger scale change towards green economies. Opportunities exist to sustain biodiversity in and around urban areas. Human health, child development and human appreciation of nature – and thus the conservation of nature everywhere – may depend on finding and implementing solutions to the dissociation of urban human forms from nature. At present there is only very limited national guidance regarding the development of green infrastructure strategies or nature-based solutions as part of spatial planning. The new National Planning Framework should address such shortcomings, with a focus on the importance of nature-based solutions for urban areas.

Dara Carroll, MSc Sustainable Development, BA Natural Science, RHS Dip Horticulture, PhD candidate

David O'Connor: Transport and Mobility within the National Planning Framework

Transport for Greater Dublin – a multi-level challenge

Any future sustainable transport vision for Dublin clearly has to be framed within the development of a **democratically-decided regional strategy for Greater Dublin and the East** whose aim is to create a city-region with a low carbon future delivering the highest quality of life to all citizens.

1. This would fundamentally require the development of a **regional Bus Rapid Transit (BRT) *scheduled* network** to serve the huge growth happening in Dublin's outlying towns. The Markelius General Plan achieved something of this level for the greater Stockholm region in the 1940s-1950s. This used a system of "half-containment" (50% internal and 50% external trips) and transformed Stockholm "from a pre-war mono-centric city to a post-war polycentric metropolis"¹.
2. It is entirely feasible and cost-effective to develop a *high-level-of-service* **Core Public Transport Network** for all of Dublin's *Metropolitan area*, one that is efficient, reliable, affordable, always there and accessible to everyone. The *metropolitan area* is the continuous, contiguous built-up area – defined by the CSO as "Dublin City and Suburbs" (pop.: 1.1m) – and includes Tallaght, Lucan/Clondalkin and Blanchardstown. The "Visionary Public Transport System for Dublin"², by Aris Venetikidis, serves as a good, viable example.



Fig. 1: Aris Venetikidis' Integrated Map for a Visionary Public Transport System for Dublin (extract)

3. A third essential tier is to provide a **demand-responsive community transport (e.g. Local-Link) service** to support urban communities and provide full mobility for all individuals.

¹ Cervero, R., "The Transit Metropolis – a Global Inquiry", (1998) pp109 - 131

² <http://www.vision-for-dublin.com>

4. To really connect communities, the NTA's **Strategic Green Network** for the Greater Dublin Area should be completed as expeditiously as possible.

For the above to succeed in any way, the **Dublin Transport Advisory Council** (as fully provided for in the Dublin Transport Authority Act 2008) needs to be established and vested with a stake in determining Dublin's transport strategy. The "Transport Strategy for the Greater Dublin Area" also needs to be comprehensively reviewed on foot of the NPF / RSES.

Transport for Ireland – key issues

1. Several Irish cities are currently debating policies towards LRT. There is overwhelming international evidence³ to demonstrate that what is achievable within LRT and even metro rail corridors – in terms of capacity, level of service, branding, etc. – is at least as achievable within a BRT system, but at a fraction of the cost. Cities would yield a *significantly* higher return on investment – and deliver on sustainability targets far sooner – by electing for appropriate **Bus Rapid Transit (BRT)** solutions.
2. Similar Regional / Metropolitan / Local / Green Network Strategies (Steps 1 – 4 for Greater Dublin above) are entailed for the 2nd tier cities (Cork, Drogheda, Galway, Limerick and Waterford), with appropriate governance and within sustainable land use and planning models.
3. John Moran has proposed upgrading the N25. It may also be prudent to continue the Gort / Tuam alignment improvements to Derry. And the marginally beneficial A5 project should be dispensed with in preference for an M2/A6 Belfast – Derry motorway connection.
4. **Community Transport** (the Local-Links service) is vital for a sustainable future within a changing Ireland. The rural transport sector has delivered significant efficiencies and maintained vital social services. It is critical that community and social returns are retained at the heart of its mission, strategy and tactics. Community transport needs to be a recognised part of the future NPF, expanded even into urban areas.
5. Cities and / or the government need to establish **Neighbourhood Environmental Funds**, to redesign and traffic calm our local streets so they are healthy, child-friendly, age-friendly, walk-able and cycle-able public areas. To support this there should be full and mandatory implementation of **DMURS**⁴, including workshops and training services for local authorities. Infrastructure funding should be withdrawn from local authorities who fail to properly apply this mandatory guidance.

³ For example: the World Resources Institute (<http://www.wrirosscities.org/>); Institute for Transportation and Development Policy (<https://www.itdp.org/>); Sustainable Urban Transport Project (<http://www.sutp.org/en/>); Thredbo International Conference Series on Competition and Ownership in Land Passenger Transport (<http://www.thredbo-conference-series.org/>); BRT Centre for Excellence (www.brt.cl & www.brtdata.org); LSE Cities (<https://lsecities.net/about/lsecities/>), etc.

⁴ Design Manual for Urban Roads and Streets, downloadable at: <http://www.smartertravel.ie/content/publications>

6. It is hugely disappointing that Ireland remains perhaps the last and only OECD country not to demonstrably have reached “Peak Car”, the evidence for which Professor Kenworthy, one of the most eminent and influential researchers of contemporary urban transportation, points out to be incontrovertible⁵. A reinvigorated, annually-reviewed **Smarter Travel Policy**⁶ needs to be at the centre of the National Planning Framework, with renewed and ambitious targets embedded in Dublin’s Transport Strategy and all other development plans.

David O'Connor, M.Sc. Spatial Planning, M.A. (Int.), Dipl. EIA Management, MCILTI, MIPI, MTPS

⁵ “Planning for Peak Car: How Urban Development is Moving Beyond Auto Dependence”, talk by Professor Jeffrey Kenworthy to SFU Urban Studies Unit, Vancouver, September 2015
<https://www.youtube.com/watch?v=0cPbSqUig4A>

⁶ Smarter Travel – a Sustainable Transport – a New Transport Policy for Ireland 2009 – 2020, downloadable at:
<http://www.smartertravel.ie/content/publications>

Helen Murray O'Connor: Integrated Land/Coastal Spatial Data Management within the National Planning Framework

In the past twenty years there has been much emphasis within Europe on establishing strong regulation and good practice guidance for the capture, management and exploitation (re-use) of authoritative (statutory) environmental datasets to enable the implementation of sustainable land policies (for example the Re-use of Public Sector Information (PSI) Directive, the INSPIRE Directive, the EC Shared Environmental Information System initiative among others). Similar coastal/marine governance requirements are now emerging (the Marine Strategy Framework Directive and the Marine Spatial Planning Directive etc.). Pathways to compliance with such policies are complex and lengthy as many are driven by a diversity of interests and influences primarily connected with climate changes concerns, population growth pressures and emerging environmental constraints.

European environmental regulations such as these require vast amounts of spatial data to be created, analysed and managed. As a result the formulation of spatial data management strategies within and between Member States is now to the fore. The Irish National Spatial Data Strategy is aimed at creating a framework for data access, integration, management and utilization of all public sector spatial datasets. Such a framework enables decision makers to discover, analyse and exploit government geospatial data, by giving access to a well maintained, authoritative, standardised set of core geospatial reference data frameworks within the constraints of a set of common data standards. This strategy sits within the wider EU public sector data access policies of eGovernment service provision and OpenData initiatives (data portals such as data.gov.ie, myplan.ie and dublinked.ie are fine examples of these recent data sharing strategies). However, despite these very welcome developments there continues to be significant evidence at national, regional and local levels of a paucity of harmonised marine, coastal and land-based integrated datasets. This is reflective of a much wider institutional/governance fragmentation issue as evident by the number of operational/administrative bodies currently operating with Coastal 'remit' both here and indeed across Europe.

With a coastline which is longer than that of many European countries, and governance responsibilities spread across a wide number of statutory agencies, government departments and related bodies, the identification of authoritative core coastal geographies (the spatial extent of the coastal zone (foreshore governance issues for example)), together with the availability and accessibility of land/sea interface spatial data are critical to good governance and regulatory compliance. An integrated approach to Irish coastal data management strategies is pivotal to the successful implementation of the NPF – one which contains a strong marine dimension.

Helen Murray MSc., MSc., FCSI FRICS

Dr. Ken Boyle: Climate Change, Healthy Cities and the Future Role of Agriculture and Forestry

Climate change and a warming world will be the context in which the Ireland of 2040 sits.

Agriculture, forestry, the urban environment and coastal regions will each be impacted by changes in climate. Ireland will be in a world with an altered climate, perhaps warmer and wetter summers and subject to stronger Atlantic storms and surges in sea levels. Coastal erosion will be an ongoing problem and a strategy of ordered retreat will have to be agreed on.

By 2040 Dublin and other urban centres should be car free. The desire for greater densities in urban areas should 'pay back' residents with a clean and green environment. Current urban environments are often a threat to people's health. In 2040 air quality in urban areas should be of the highest standard. To achieve clean urban air the aim should be to have urban public transport networks that are energy efficient and clean. The urban environment should be one that promotes good physical and mental health.

The Irish city of 2040 should be walkable, heavily connected with green infrastructure, offer energy efficient housing and street environments that are safe.

Agriculture will still govern the form of the rural environment. We should be considering the long term impacts of a continued reliance on meat and milk production. These are costly to the environment, contributing to greenhouse gas emissions and the eutrophication of wetlands, rivers and lakes, and luxury forms of nutrition. In a future world of 9 billion people meat and milk production is not likely to be contributing to food security. The Irish agriculture sector needs to address the issues of ongoing impacts of cattle farming on the environment.

As forests become increasingly important sinks for carbon the landscape will change. With more forest cover there will be greater access to recreation in the countryside. Tree species chosen should be long-lived and native to allow for long-term storage of carbon in soils and biomass and to encourage a greater native biodiversity.

Ken Boyle, PhD, MAgSc, B AgSc (Forestry)

Dr. Marian Coll: Biodiversity in the City

The Ireland of 2040 will be a very different place. The National Planning Framework will co-ordinate the strategic planning of urban and rural areas for many years to come. This should provide both an opportunity and challenge in the area of biodiversity protection and promotion, particularly where increased urbanisation occurs. The NPF should be seized upon as an opportunity to further integrate biodiversity and the natural environment in our decision making processes.

I very much welcome the fact that the NPF is accompanied by a Strategic Environmental Assessment, which among other areas, will ensure that biodiversity considerations are taken into account in policy formulation of the plan. I also welcome the inclusion of a specific biodiversity target within the SEA that would 'Require all regional, county and local level land use plans to include ecosystem services and green infrastructure provisions in their land use plans'(Ireland 2040 - Our Plan Strategic Environmental Assessment Scoping Report, 2017)

Further to this, I would like to see an emphasis placed on the role that urban greenspaces can play in the promotion and protection of biodiversity in our towns and cities. Open green space including parks and landscaped public open space have an important role to in our health and well being. These spaces can act as recreational resources, peaceful retreats from the city, safe and exciting play areas for children and reserves for urban wildlife.

Development of greenspace policies in relation within the Plan should emphasise the quality of these spaces in relation to biodiversity, particularly in urban settings. This should be based on the use of existing guidelines and plans such as The Green City Guidelines (UCD Urban Institute Ireland, 2008) and the All-Ireland Pollinator Plan 2015-2020 (National Biodiversity Data Centre Series No. 3, Waterford)

Marian Coll, BSc, PhD

Odran Reid: Comments on “Ireland 2040 Our Plan - Issues and Choices” - National Planning Framework Issues Paper

Effective Regional Development

This document is to be welcomed and much in it is worthwhile, but some of the thinking and analysis in it is flawed and misconstrued.

There is a core element of this document that denies the world wide and Irish move towards urbanisation. There is a presumption towards the development of Dublin (not fully explicit). The need for effective regional development is a good concept. This needs to be spelt out and it needs real flesh on it if it is to be real and measured. Balanced Regional Development has been in many Irish Policy documents, but has neither been defined well and has never been delivered. Can it be delivered or do we need to redefine our priorities and be honest about what is possible and desirable.

The analysis around comparisons between Ireland (Dublin) and other comparable countries (cities) is not always accurate. Take the comments on cities in Scotland for instance. Many of the other smaller cities mentioned are satellites of Glasgow. Indeed, Edinburgh is just 75miles away and many other of the towns included in the list of urban areas are clustered around Glasgow and Edinburgh. To get a population for Dublin of 1.6m, people places such as Drogheda (60 km from Dublin) and Naas (36km from Dublin) and a range of other such centres must have been included. The Dublin area is not defined in the document. The comparisons lead to over emphasising Dublin’s relative size and economic power.

The NSS looked at far too many centres. The new NPF needs to be much more focused and major development restricted to the development of Dublin, Cork (and possibly Limerick / Galway), along with national priorities for a protracted period of time. A different development pattern needs to be developed for other towns, villages and rural areas.

Any future national capital investment programme (central and agency) needs to be focused on theses few key cities. An infrastructural programme needs to be focused in these areas to

- Ensure these cities can get to a level of sustainable economies of scale
- Dublin can address its emerging diseconomies of scale and grow its infrastructural capacity so that it can become a serious economic entity on an international basis.
- Allow these cities develop their core town centre areas with a mix of retail, commercial and residential making them vibrant and lively places to live and work. Investment and development should be focused on the key areas within these cities for a period of time until a critical size can be reached and they act like dynamic areas.

Local Government Reform Has Been Inadequate to Date

Other towns and villages with their rural hinterlands need a coherent plan to assist their development allowing them to grow, where appropriate, or stay stable as far as practically possible

in a realistic and coherent way and not on the basis of hopeful aspirations or lines in a policy statement that cannot be delivered.

The consultative document indicates that there has been reform of local and regional government. This reform has not been adequate. Strong Regional Authorities (Assemblies) with realistic powers and a string of well-resourced Local Authorities with enhanced powers is needed to deliver the NPF. It is also important that national and regional bodies align their structures and investment priorities with the regional and local government structures and the NPF priorities (health, education, housing, industrial development and policing in particular). There is a need to define the GDA and put a governance structure in place to develop and deliver strategic investment programmes (transport, waste, education, health and policing).

Implementation

A set of interdepartmental and cross sectoral teams need to be put in place to a) monitor and b) implement the NPF. These teams need to be drawn from different Government departments, Regional Authorities, state bodies and key NGO's. It should have an Oireachtas oversight committee and be a statutory document.

Priorities

As a backdrop to this NPF, a strong emphasis has to be put on

- Addressing climate change
- Allowing our cities compete internationally
- Being flexible enough to allow the country take advantage of key international economic changes and changing economic circumstances
- Addressing development on an island wide basis
- Creating of a sustainable and equal society

The conflict of continued economic development and addressing climate change has to be addressed through a more coherent development pattern.

- Key cities have to be developed in a more planned and sustainable way
- Integrated Land use and Transport planning have to be central to this
- Public transportation has to be overwhelmingly prioritised in all plans and planning schemes
- Cities have to grow from the centre out with key priority areas being identified and managed by stronger governance structures
- Strong identifiable areas designed to allow communities emerge, rather than be driven by elongated, never-ending housing estates, which become like housing tundra
- That employment policies will include opportunities for people of differing skill levels and in disadvantaged areas

Rural Development

The role of rural areas and rural towns need to be addressed honestly. There has been a prolonged movement from rural to urban areas. The development of one-off housing and remote living has made it more difficult to deliver sustainable services and social services. It has also made it more difficult to address the decline of rural villages. The delivery of national infrastructural investment programmes has been made more difficult to deliver. Appropriate development in rural areas is to be encouraged. What is appropriate and what will sustain rural areas and rural life has to be defined and sustained by national expenditure and transfers from the exchequer. Larger towns and small cities need to address the poor structural development that took place in the Celtic tiger era. It is necessary in the period covered by this NDF that a more coherent development pattern should be followed and promoted.

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