



RTPI Ireland

mediation of space · making of place

Royal Town Planning Institute Ireland

c/o 38 Merrion Square

Dublin 2

Ireland

Phone: [REDACTED]

Email: contact@rtpiireland.com

Website: www.rtpi.org.uk/ireland

Twitter: @RTPIIreland

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

Email to npf@housing.gov.ie

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Dear Sir/ Madam

THE NATIONAL PLANNING FRAMEWORK FOR IRELAND

RTPI Ireland welcomes the production of the new National Planning Framework (NPF) and is pleased to be part of its Advisory Group. Below are our comments based on the 'Ireland 2040 Our Plan: Issues and Choices' paper.

RTPI IRELAND

The Royal Town Planning Institute (RTPI) is the champion of planning and the planning profession. We work to promote the art and science of planning for the public benefit. We have around 300 members in Ireland and a worldwide membership of nearly 23,000. We:

- support policy development to improve approaches to planning for the benefit of the public;
- maintain the professional standards of our members;
- support our members, and therefore the majority of the planning workforce, to have the skills and knowledge they need to deliver planning effectively;
- maintain high standards of planning education;
- develop and promote new thinking, ideas and approaches which can improve planning;
- support our membership to work with others who have a role in developing places
- improve the understanding of planning and the planning system to policy makers, politicians, practitioners and the general public.

PRINCIPLES FOR THE NPF

RTPI Ireland believes that the National Planning Framework should be a truly ambitious document that establishes key objectives for an all Ireland in the short, medium and long term; and accordingly, outlines a vision for how these will be delivered spatially. The NPF should be seen as a key opportunity to achieve ambitions in areas such as sustainable development, sustainable economic growth, sensible town planning and in tackling climate change.

Those countries that have successfully planned for sustainable economic growth – such as the Netherlands, Norway and Sweden – have combined an approach that sets priorities and drives

action from a national level down along with ‘bottom up’ community engagement and empowerment. They have explicitly embraced national and strategic planning as a mechanism to achieve this. They have used the planning system as a means of demonstrating national leadership through setting out their ambitions for the country and for making often-difficult decisions that can bring short, medium and long-term benefit.

We have already submitted a list of 10 principles for the NPF as part of the consultation process. These are still relevant and say that it should:

- be ambitious.
- prioritise.
- be integrative.
- be influential.
- be clear and holistic.
- focus on delivery.
- focus on outcomes.
- be linked directly linked to other policy, and vice versa.
- be clear on where it links with other policy, guidance, advice and good practice.
- be based on sound evidence and needs to be monitored to ensure it continues to be fit for purpose.

Full details are contained in the Annex to this paper.

SPATIAL STRATEGY AND HIERARCHY

We believe that the NPF can help to establish a clear hierarchy for visioning and decision-making. It should be a high level document where Government clearly sets out, and differentiates between:

- the policies/ strategy in place to achieve the outcomes it aspires to. These should be the main thrust of the NPF.
- the means of delivering these, which should be contained in an Action Plan.
- guidance on definitions and technical aspects in place to support delivery, which should not be in main body of the NPF.

However, the NPF must also set out to describe and support a strategic and realistic spatial structure for the country that has regard to the strengths and resources of each area on its merits and avoid the creation of false hierarchies or undue equivalences. As such, the NPF should seek to outline a vision to strengthen and build on regional and local advantages in a realistic and strategic way.

The NPF should not permit the country’s spatial structure to be seen as a rigid division of administrative areas, but rather as a dynamic interworking of areas that are linked by economic, social, cultural, or physical factors in different ways at different times. Structures as diverse as Greater Dublin, the “Wild Atlantic Way”, and the Shannon Estuary – at three radically different economic and spatial scales, operate across administrative boundaries, but need to be seen at some level as unitary entities.

The NPF should encourage further growth of Dublin - which now accounts for over 40% of the population - ensuring its position is not hindered as an international competitive economic region. However this needs to be consolidated and utilise all public transport possibilities and advantageous of the area as a whole instead of it being currently being 4 administrative areas abutted by three more. In planning terms, Dublin should grow out sequentially from the centre, consolidate the gaps and prevent overspill into the bordering counties. The illogical nature of the all the green belts within Dublin and the adjoining areas have no strategic merit and accordingly the application of such

should be to encourage growth within the Metropolitan Dublin Area. Green belts should then be applied to prevent urban sprawl and the creation of over dependence of the private motor vehicle.

Like all well planned cities, it should be a target to ensure that the population of daily workers do not have to travel more than 20-30 minutes max to their place of employment. The building of new homes should be carefully considered in this context and any location of jobs that create long commutes in that there is no nearby employments centres should be prevented.

Whilst supporting and consolidating the urban areas, the plan needs to take a close look at the rural exodus, especially from rural villages. The one off house should become the exception as opposed to the norm in rural areas where they are provided for farmers who have explicit need to live on the farm. Reuse of existing farming estate should be examined in addition to the European norm of rural people living in rural villages sustaining services and community facilities.

Regional Approaches

The NPF should learn from the challenges of developing and implementing the National Spatial Strategy. It should promote a regional and strategic approach to planning, where this is required, so that it can identify key opportunities and gaps in existing plans and frameworks. In doing this, the NPF should work with local authorities to assess and identify where there is a critical mass for developments that could be established as “areas of opportunity”. These areas of opportunity may not need to conform to traditional administrative boundaries but be functional areas that bring together those places which would provide most added value if they were to work together. This would allow them to establish priorities and make best use of investment. The NPF should be a document that seeks to facilitate and encourage innovation and creativity in communities, and as such should be a “living” document that does not stifle or inhibit new ideas and emergent trends in, e.g. technology, industry or tourism.

We believe that the NPF should look to maximise the potential of growth in Dublin but ensure that the benefits of this are shared. There is a real need to ensure that growth in Dublin is planned properly to make sure that it is sustainable and supported by the right infrastructure and facilities. This should explore a more integrated approach in Dublin which is cross cutting and which identifies key projects and how they will be funded.

Infrastructure

The NPF should be ambitious on infrastructure provision and should integrate it to support existing and new development. We believe the NPF must:

- coordinate and influence investment and align budgets for infrastructure to improve liveability, connectivity and the low carbon economy.
- ensure that Irish Water and other utilities are engaged early in the development of the NPF. This will set the context to better align their investment strategies with Regional Strategies and Economic and Community Plans.
- develop and implement innovative funding mechanisms to support infrastructure delivery.
- invest in infrastructure, including green infrastructure that prevents and mitigates flooding.

The NPF should recognise that new infrastructure could be used to ‘make the market’ and stimulate growth in places where this may be required. Infrastructure should not just focus on roads but look to include other key factor to make places successful such as broadband, public transport and green infrastructure.

VALUES AND RESPONSES

We believe that the NPF can be an important tool for Government in providing certainty for planning authorities, developers, investors and communities. This requires the NPF to:

- provide a framework to enable delivery by including a delivery focussed Action Plan that links to, and influences decisions on, resources.
- outline clear policy and geographical priorities that indicate the implications of the documents for specific sectors or areas of Ireland.
- be thought of as an investment strategy as well as a planning document, that highlights future opportunities and assets that are to be valued.

Urban Form

RTPI Ireland is of the view that the NPF should have at its heart the pursuit of a more compact urban form in our towns and cities. This will involve increasing densities and building heights to develop more consolidated urban places. It should look to reusing vacant and underused part of our settlements thus encouraging brown field site development before greenfield development sites are even considered.

This supports the principles of sustainable development in making best use of land and reusing brownfield. It provides a context for settlement strategies that can help to minimise unneeded car use. It can ensure that we make better use of existing infrastructure.

Towns and Countryside

Our rural villages and towns can be key drivers of the economy. Given this, RTPI Ireland thinks that we need to ensure that they are prepared for investment and protected from threats to their viability. This need to recognise that the success of rural villages and towns can rely on their links with other places and on what is happening outside of them. The NPF needs to pursue the social and economic resilience of towns and villages as a key objective rather than unrealistic or overly aspirational plans or policies.

We believe that the NPF must use planning policies to ensure new development looks to support rural villages and towns as the first option for new development and to minimise out of village/ town/ city development rather than greenfield.

The NPF should also look to protect our most valuable landscape, places and buildings in rural Ireland. This will require rigorously applying designations that clearly establish where development can and cannot take place. As part of this RTPI Ireland advocates that the NPF restricts the development of one-off houses in the countryside. Critical mass should be built into towns, villages and cities.

Sustainable Development and Climate Change

The NPF should have achieving sustainable development and tackling climate change as a cross cutting theme and value. It should seek to encourage the shift to a low carbon economy and a low carbon society. In doing this, it should support renewable energy and actively identify Strategic Energy Zones or Corridors based upon environmental, social, community and economic impacts, while having regard to our international and European commitments to climate mitigation and adaption and potential energy generation.

As part of this RTPI Ireland believes the NPF can have an important role in supporting healthy lifestyles. The NPF should be about improving the quality of life for people across the country and so should promote and establish priorities that deliver attractive, liveable and walkable places. In doing this, it must aim to promote active travel such as walking, cycling and the use of public transport, whilst at the same time reducing unnecessary car use. Future settlement patterns and urban design can have a bearing upon this. The NPF should also aim to improve air quality, especially in urban areas, and promote the protection of existing green space, as well as the establishment of new green spaces in new developments.

Energy and Resources

RTPI Ireland is of the view that the NPF must look to maximising the potential of renewable energy and minimising impacts on the environment. Key to this will be the influence that the NPF will have over power and energy that is in the hands of agencies and utility companies.

The implications of development off shore can have implications for on shore and vice versa. Given this, we believe that NPF and the Marine Plan must be clearly linked. This will enable planners and the planning system to provide a clear spatial strategy for energy provision and the infrastructure that this requires. It will also allow planners to more effectively connect the land use planning regime with the marine planning process and recognise that there is need to look at all aspects of energy, not just focus on onshore wind. RTPI Ireland believes that the Marine Plan and the NPF should therefore:

- have the same time frames and implementation horizons
- work towards achieving the same outcomes
- undertake joined up consultation exercises
- be subject to the same scrutiny arrangements in the Oireachtas and at the same time
- work towards delivering the same action programme

Population and Migration

The NPF needs to address the implications of population change. A component of this will be Brexit, especially in terms of settlement growth, economic opportunities and housing development. We believe that there is a need to put joint working arrangements in place with the Northern Ireland Executive to support the development of the NPF. RTPI Ireland welcomes the recognition in the consultation document that there are different cross border opportunities and challenges in different areas of the country.

The RTPI produced a research paper in January 2015 entitled 'Strategic Planning: Effective Cooperation for Planning Across Boundaries'. The paper considers strategic planning as a solution to issues such as the management of housing markets, transport networks, river basins, energy supplies and investment in skills needed to co-ordinate across an area wider than a single local council. Through the research for the report and the experience drawn from the wider RTPI membership various general principles which strategic planning should follow irrespective of where it is practised have been developed. Strategic planning should:

- Have focus – being efficient in the use of resources and clear about its purpose;
- Be genuinely strategic – dealing only with matters which require resolution across boundaries;
- Be spatial – i.e. it should make choices between places, not simply establish general criteria for later decision making;
- Be collaborative – meaning that partners work together to see how they can deliver each other's agendas;
- Have strong leadership – so that negotiations between places are productive and not protracted; and
- Be accountable to local electorates.

A full copy of the report can be found on the RTPI website or accessed via this link:

<http://www.rtpi.org.uk/media/1230885/RTPI-Strategic%20Planning-Brochure%20FINAL%20web%20PDF.pdf>

We are of the view that there will be a need for ongoing dialogue after the publication of the NPF. This will help to address any cross border issues, especially infrastructure links and handling of major developments in each country and the impact they may have on each country. It must be

remembered that developments in either country may well rely on, or be influenced by, infrastructure and activities in the other.

The NPF must utilise census 2016 figures and not create trend analysis from 2011 that was a period of out migration. The current prognosis is that in migration may amount to over 60,000 new people coming into the country that was forecasted before Brexit. With Brexit now initiated, the place of destination of choice may become Ireland given it will be the only country in Europe that has English as its primary language. English is typically the second choice language spoken in most European countries a younger educated population may look to opportunities outside their own countries. Ireland may become attractive for this reason and for other economic and taxation issues.

The NPF must also look towards the changing demographics of the country and the implications of an ageing population. This will have ramifications for housing demand and housing size; for the location of housing and other facilities; and for ensuring that our environments are delivered so that they are age-friendly.

GOVERNANCE AND OVERSIGHT

RTPI Ireland believes that planning has an important role in supporting the Government's ambitions on sustainable development, sustainable economic growth, engagement, climate change, placemaking and well-located new development. Given this, the NPF has to set out the vision for Ireland over the short, medium and long term. It has to set out what we want Ireland to be and provide a routemap on how this will happen. We believe that the NPF should be an integrated plan for Ireland that all provides the focus for all parts of Government and its agencies, planning authorities and those engaging with the planning system.

Governance

The NPF needs to be the context to focus the work and actions of the Government, agencies and planning authorities to ensure that the plan is implemented. Government must ensure that NPF is a corporate document that influences other key Government strategies.

It is essential that the NPF is:

- led corporately within Government with the Taoiseach having an important role in using it to coordinate action and as a tool to assess progress made.
- a statutory document that is scrutinised by the Oireachtas.
- based on a detailed, up-to-date and transparent evidence base that is monitored regularly
- reviewed every 5 years to ensure that is relevant, up-to-date and responsive to changes in context
- focused on what is to be achieved in the longer term given its 20-year horizon.

The importance of the evidence base cannot be underestimated. RTPI Ireland published research in 2016 'Developing a Planning Research Agenda for Ireland' which will be informative in establishing and make best use of evidence. It says that the primary goal of a future planning research agenda should be to ensure that sufficient and appropriate evidence and data is available to support the work of planners in the pursuit of proper planning and sustainable development in Ireland.

The planning research agenda should recognise that academic, applied and commercial research in planning are all crucial components of evidence-led planning in Ireland. Academic research in planning should be more closely aligned to the needs of practice and its outputs should be more easily available to the practitioner community. Priority should be given to research that addresses the core concerns of planning itself and especially planning practice. These include: transparency and accountability in planning decisions in the post-Mahon era; the relationships between planning,

market behaviour and employment-led development, the integration of spatial planning with national and regional priorities; and the crucial contribution that planning must make to strategic decisions about infrastructure, water and waste, energy and landscape.

The report can be read at <http://www.rtpi.org.uk/planningresearchireland>.

Delivering the Plan

RTPI Ireland thinks that the NPF needs to provide clarity by setting out the high level ambitions Government is aiming to achieve and planning's role in supporting this and the indicators that will be used to monitor progress.

We are of the view that the NPF should have an Action Plan. Key to the success of the NPF is that it delivers change on the on the ground. Given this RTPI Ireland is of the view that it should have and Action Plan or route map which sets out the key developments it is promoting and:

- Where these will be delivered
- Who leads and contributes in taking forward the development
- Who is responsible for what
- When milestones will take place
- How it will be resourced

This should be reviewed and reported on regularly. Such an Action Plan/ routemap would help to provide a focus for Government, agencies and private sector investors to have a clear idea of who is responsible for what. It would help to provide a focus for pan-Government discussion on future needs and investments required.

We think that it is important that a NPF Monitoring Report is published annually/ bi-annually to the assess progress being made. This could ensure that the NPF is on the right track, or, if it is not having the impact expected, lead to discussion on what needs to be done to change that. We believe that the Monitoring Report should be presented to the Oireachtas.

Oversight

The fact that the NPF needs to be viewed as corporate document within Government means that there is a continued need to have arrangements in place to ensure buy in. There may be a continued role for the Taoiseach to act as the key promoter of the NPF within and across Government. RTPI Ireland would be delighted to further detail the above submission and express their interest in working within the Advisory group.

It would be good for the NPF to have an Oversight Group, chaired by the Minister and involving range of external partners. This oversight group could meet once or twice a year to assess the impact of the NPF and progress made against outcomes and indicators. This could feed into the publication of the Monitoring Report. RTPI Ireland would be pleased to be part of this group.

It should be noted that RTPI Ireland currently sits on the NPF Advisory Group with our Chair, John Downey, acting as the representative. However, this is not made clear in NPF documentation so we would appreciate this being set out clearly. We were also disappointed not to receive an invitation to the Preliminary Stakeholder consultation event, especially as RTPI Ireland is a prescribed body for the purposes of section 106(1)(a) of the 2000 Planning and Development Act. RTPI Ireland is committed to working constructively with Ministers and Officials to support the development and implementation of the NPF and so are keen to engage on future discussion and input our members' knowledge, expertise and experience of planning in Ireland and further afield.

CONTACT

I trust that you find these comments useful. Our Director, Craig McLaren, can be contacted on [REDACTED] or contact@rtpiireland.com to discuss the points raised in our letter further.

Yours sincerely

John Downey

John Downey MRTPI MIPI
Chair, RTPI Ireland

ANNEX 1: PRINCIPLES FOR THE NPF

RTPI Ireland believes that a number of principles should be at the heart of developing the NPF

1. It should be ambitious.

RTPI Ireland believes that the NPF and the planning system in general can do more for Ireland. NPF should therefore be a truly ambitious national plan supported by ambitious policy. NPF should be seen as a document that can be used to attract investment to the right places in Ireland whilst it should be clear about those areas that should be protected. This will require the NPF facing up to often-difficult decisions where there will be winners and losers. It will benefit no one if these are ducked as developers, investors and communities need clarity, certainty and predictability. The document needs to provide that.

We are pleased that the Government has set out the first steps in what should be an ambitious national spatial plan. The document provides a good indication of the key issues facing Ireland over the next 20 years, the spatial implications of these, and the approaches to be taken to dealing with them.

We are pleased that the consultation has flagged some of the key questions that need to be asked. It is vital that the finalised document clearly presents answers to these. It must be seen as a strategy that clearly articulates those areas where investment is promoted and required, and, those places that should be protected. This will require the finalised NPF facing up to often-difficult decisions where there will be winners and losers. It will benefit no one if these are ducked as developers, investors and communities need clarity, certainty and predictability.

2. It should prioritise.

The current economic climate means that now, more than ever, there is a need to prioritise investment and the levers that can encourage investment, such as infrastructure. Given this, we feel that there is a need to ensure that the NPF incorporates and articulates realistic options for growth, no growth, and negative growth across Ireland. It should be borne in mind that this will not always require new development. It is often about making the best use of the assets that are already in place.

3. It should be integrative.

We feel that a key role for the NPF is to bring together and reconcile the objectives of various other strategies and objectives published by the Government and its Agencies. These include, for example the Marine Plan; transport; low carbon strategies; energy strategies; broadband; tourism development; regeneration; health inequalities; housing; education; waste strategies and town centres.

4. It should be influential.

The NPF should lead, rather than follow. It should be seen as the key spatial plan for the Government who should ensure that its various strategies and subsequent resource allocation are taken forward within the context of the document. It must also influence the priorities and resource allocation of Government's agencies. The NPF should be the main document that illustrates the geography of all of the Government's policy. By its nature, the NPF must be cross cutting and embedded within all aspects of Government activity that have spatial implications.

The document should also influence the plans and decisions of utility companies and private sector developers and investors who often hold the resources needed to deliver developments. This means that they need to promote a collaborative approach between these organisations and sectors where risk and rewards are shared.

5. It should be clear and holistic.

RTPI Ireland feels that there is a need to ensure that the NPF is clear on its vision, aim, objectives and priorities. This will require precise wording and expression in the document and clarity on areas the appropriateness of development or protection.

6. It should focus on delivery.

RTPI Ireland feels that it is worth exploring the idea of the NPF working towards a number of specific national targets, framed within a number of national outcomes, which are set out in a broader planning policy. These targets could be derived from existing national targets and could cover, for example, housing numbers, energy, renewables developments, waste and derelict land. Key to this is ensuring that the NPF promotes a clear relationship between infrastructure provision and development opportunities. Infrastructure is a key means ensuring that we can make the most of development opportunities in a sustainable way. We need to ensure that the NPF is seen as an implementation tool as much as a strategy.

7. It should focus on outcomes.

RTPI Ireland thinks that it would be useful if the NPF was focused around delivering a number of key outcomes. This would help to demonstrate how the planning system contributes to key priorities and provide a more holistic basis upon which to plan Ireland. In taking this forward the NPF should establish a number of key outcomes that show the aspirations for what we want Ireland to be at that time. These outcomes would give a clear idea of what we should be planning for and allow for a routemap to be developed setting out who is responsible for what. We believe that these outcomes could be along the lines of:

- A high quality of life
- A low carbon Ireland promoting renewable energy
- A connected Ireland
- An inclusive Ireland
- An economically successful Ireland.

8. The NPF needs to be linked directly linked to other policy, and vice versa.

RTPI Ireland is of the view that it is essential that there is a clear relationship between the NPF and existing policy. There may be a case for a producing an overarching policy document that sits alongside setting out the key policies of the Government. Documents should have the same outcomes and targets with the policy document dealing with the 'how' and NPF the 'where'.

9. There needs to be clarity on where the NPF links with other policy, guidance, advice and good practice.

It is considered that links have to be made with, and clarity given on the status of, key documents policy and guidance published by other parts of Government and by agencies.

10. NPF needs to be based on sound evidence and needs to be monitored to ensure it continues to be fit for purpose.

RTPI Ireland is of the view that a sound and transparent evidence base must be in place to demonstrate why policy directions and priorities have been set out in the NPF. This should involve publishing regular Monitoring Reports and that an Annual Report should be presented to the Oireachtas. This may provide a more current idea of trends and enable the Government to assess whether amendments need to be made to the NPF. This will require clearly defined indicators.