



IRISH PLANNING INSTITUTE

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Eastern & Midland Regional Assembly
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Date: 23rd January 2019

Re: Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region Public Consultation

Dear Sir or Madam,

The Irish Planning Institute (IPI) welcomes the opportunity to comment on the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region (Draft EMRA RSES), as published in November 2018. The IPI has undertaken extensive consultation with its members on this subject, including a Policy Forum event; the input of members sitting on the IPI's Policy and Research Committee and the input of the wider membership of the IPI.

Founded in 1975, the Irish Planning Institute (IPI) is the all-island professional body representing professional planners engaged in physical and environmental planning in Ireland. The Institute's mission is to advance planning by serving, improving and promoting the planning profession for the benefit of the community and the common good. The IPI represents c.700 planners from across the public, private, semi-state and academic sectors. Our members work in central government, private practice, agencies, third level institutes, planning authorities in the Republic of Ireland and Northern Ireland, An Bord Pleanála and elsewhere. It is also affiliated to the umbrella body the European Council of Spatial Planners (ECTP-CEU) and has international links with the Planning Institute of Australia (PIA) and the New Zealand Planning Institute (NZPI) and is a member of the Global Planners Network (GPN).

The Institute recognises the importance of the Regional Spatial and Economic Strategies following on from publication of the *Project Ireland 2040: National Planning Framework* (NPF) earlier this year. The Institute sees Regional Spatial and Economic Strategies as heralding a new era of developing public planning policy in Ireland. The Institute welcomes the decision to draft a Dublin Metropolitan Area Strategic Plan (MASP), which straddles the different jurisdictions of the Dublin Metropolitan Area, with statutory backing under National Policy Objective 67 of the NPF. This is necessary if the co-ordinated, integrated and sustainable growth of the Dublin Metropolitan Area is to be ensured.

Executive Summary

- The Institute sees Regional Spatial and Economic Strategies as heralding a new era of developing public planning policy in Ireland. The Institute welcomes the decision to draft a Dublin Metropolitan Area Strategic Plan (MASP), which straddles the different jurisdictions of the Dublin Metropolitan Area, with statutory backing under National Policy Objective 67 of the NPF.
- In order to ensure that the EMRA RSES is an effective tool for the implementation of the National Planning Framework, it is the Institute's strong contention that:
 - (i) Actions must be specific and measurable against known benchmarks;
 - (ii) There must be a clear means of implementation for the policy set out within the RSES; and
 - (iii) Implementation structures must be adequately resourced.
- The Institute strongly supports policies set out in the Draft EMRA RSES encouraging sustainable and quality development of brownfield/infill lands in urban areas and encouraging alternatives to single houses in the countryside. However, the EMRA RSES must be clearer in expressing the need for strict adherence to the sequential approach for all housing, including rural housing, in order to direct housing in the first instance to rural towns and villages.
- The EMRA RSES must set out a more detailed strategy for rural areas if the goals of the National Planning Framework are to be achieved and must be clearer in defining what the EMRA envisages the changed role of rural areas by 2040 to be in the context of national planning policy in order enable local authorities to specifically plan for the successful delivery of and protection of these roles.

Implementation

The Institute acknowledges that considerable progress is made in identifying the weaknesses of the *National Spatial Strategy* in relation to weak implementation and attempting to remedy those weaknesses in the *National Planning Framework* and the *Regional Spatial and Economic Strategies*. In order to ensure that the EMRA RSES is an effective tool for the implementation of the *National Planning Framework*, it is the Institute's strong contention that:

- (i) Actions must be specific and measurable against known benchmarks;
- (ii) There must be a clear means of implementation for the policy set out within the RSES; and
- (iii) Implementation structures must be adequately resourced.

Actions must be specific and measurable against known benchmarks

With regard to the second item, it is of paramount importance that the EMRA RSES will be capable of implementation. Given this, the EMRA RSES must be clear and concise.

Only a small number of the 219 Regional Policy Objectives set out clear quantitative targets or administrative and statutory measures to be put in place or enforced. Regional Policy Objectives 7.28-7.30 provide examples of establishing clear targets for identified bodies within stated time lines as follows:

"RPO 7.28: Within 1 year of the adoption of the RSES, the EMRA shall seek with other stakeholders to carry out an assessment of transport emissions in the Region to identify GHG forecasting and to analyse the emissions impacts of development in the Region.

RPO 7.29: Within one year of the publication of the RSES, the Climate Action Regional Offices shall compile a greenhouse gas emissions inventory for the Region to allow for planning of strategic mitigation action through a Regional Decarbonisation Plan. The Climate Action Regional Offices shall track the success of the Plan through annual inventories completed each year. Annual reporting of the inventories and critical analysis of the proposed measures will be undertaken to track progress within the Region and to track progress with national targets on a regional basis.

RPO 7.30: On publication of the first regional emission inventory, the EMRA in conjunction with the Climate Action Regional Offices shall identify the sectoral emissions and assign a series of sectoral emissions reductions targets for each sector within the Regional Decarbonisation Plan. These emissions reductions targets will be based on an aggregate 40% reduction in greenhouse gas emissions by 2030 in line with the EU 2030 Framework."

A sizeable proportion of Regional Policy Objectives restate existing statutory requirements (e.g. the requirement to undertake SEA or AA; the requirement to have regard to existing statutory guidance, etc.). All other Regional Policy Objectives are vague, aspirational in nature or open to numerous interpretations. For these latter objectives, given the level of uncertainty around their meaning, it is difficult to see how local / regional authorities or other bodies will attempt to implement them or how the Office of Planning Regulator will determine whether implementation has occurred or not. To give a small number of examples:

- A large number of the Regional Policy Objectives state that it is an objective to "support" certain actions (e.g. support the renewal or regeneration of underused lands; support certain uses in certain locations; support and protect the role of strategic functions; support the role of towns as tourist hubs; support and protect rural economies, etc.). What exactly does "support" mean in this context? How will implementation of these objectives be measured? For example, how will the success or otherwise of implementation of Regional Policy Objective 6.25, the objective of which is to "*Support enterprise development agencies and LEOs in their efforts to increase business innovation capacity, to create a distributed network of coworking hubs, to promote Ireland's Edge to strengthen linkages between Irish-owned enterprises and foreign owned enterprises, and to support existing Irish Entrepreneurs and to attract overseas entrepreneurs*", be measured?
- Similarly, a number of the Regional Policy Objectives state that it is an objective to "facilitate" certain actions. What exactly does "facilitate" mean in this context? How will implementation of these objectives be measured? For example, how will implementation of Regional Policy Objective 7.17 ("*Facilitate cross boundary co-ordination between Local Authorities and the relevant agencies in the Region to provide clear governance arrangements and coordination mechanisms to support the development of ecological networks and enhanced connectivity between protected sites whilst also addressing the need for management of alien invasive species and the conservation of native species*") or 9.23 ("*Promote and facilitate the role of arts and culture in recognition of its importance to people's identity and the potential*

for economic development through a unique cultural tourism offering throughout the Region”) be measured?

- What are the key characteristics of “attractiveness” in the context of Regional Policy Objectives 4.30 and 5.3? How will the success or otherwise of these objectives be measured?
- As is done for climate change (i.e. Regional Policy Objectives 7.28-7.30 listed above), clear benchmarks should be provided in relation to the environmental objectives set out in Chapter 7 (i.e. in relation to water resources, air quality, noise, landscape, etc.). For example, what are unacceptable levels of pollution and what are key goals for air quality?
- In relation to Regional Policy Objective 8.23, what is the definition of an “appropriate location” in the context of the delivery of ICT infrastructures such as data centres and associated economic activities?

Need for a clear means of implementation

The Institute notes, as referenced at page 42 of the Draft EMRA RSES, that the hierarchy of plans under the NPF proposes a different approach to ensuring ‘headroom’ in the zoning of land. Specifically, as outlined in the NPF Implementation Roadmap and the Draft EMRA RSES, whereas previously it had been accepted practice to zone 50% more land than would have been necessary to meet demand during the life of the development plan, a 25% headroom allowance has been included within population projections. Counties predicted to grow at or above the national average growth figure (i.e. which includes all four Dublin Authorities, Kildare, Louth, Meath and Wicklow) may provide for an additional 25% headroom. The Draft EMRA RSES further notes that the NPF does not propose the downzoning or de-zoning of land. For example, the Draft EMRA RSES states: “the consideration of development land prioritisation measures by local authorities rather than ‘dezoning’ of land, where there may be a surplus, would be more appropriate.” The Draft EMRA RSES goes on to discuss measuring delivery through active land management.

Given that the NPF Implementation Roadmap proposes a very short time frame for the review and alignment of development plans with the RSES, it is essential that clear and detailed guidance on how this process will work in practice is made available to local authorities before the adoption of the EMRA RSES. For example, questions that might arise include:

- What procedure should be followed in setting priorities for the sequencing of land delivery? Is this a toolkit? Does this process involve stress-testing infrastructure?
- In the event of a surplus and where land prioritisation measures are put in place, should local authorities be specific and identify a Phase 2 allocation?
- What discretion or flexibility will the process include for the release of additional land for development (i.e. in situations of land hoarding or complex infrastructural delay)?
- If key investment envisaged when the development plan is made does not arrive, should population projections be reviewed?

Adequately resourced planning authorities are well placed to deliver spatial plans that can give effect to the objectives with regard to active land management and the sequencing of delivery. However, in order to do so, it is of critical importance that clear and usable guidance on the process to be followed is provided to local authorities before the adoption of the EMRA RSES (i.e. before the time frame for the review of statutory plans commences).

Implementation structures must be adequately resourced

A key mechanism for the implementation of the National Planning Framework through the RSES will be the revision of development plans and local area plans (LAP) and the preparation of Urban Area Plans (UAP) for the regional centres – this is acknowledged at Section 12.3 of the Draft EMRA RSES, which states that “most City/County Development Plans will be subject to review during 2019/21”.

Given the extensive work involved in the review of a statutory plan and given the limited resources available to many local authorities, consideration could be given to the provision of resources, and in particular, technical resources to local authorities within the region on a rolling basis. For example, EMRA could procure suitably qualified consultants to provide technical expertise in SEA and AA and the Regional Assembly could then provide that expertise in a co-ordinated manner to the counties as required.

Policy for pattern of growth in urban and rural locations

Densification of settlement and the creation of compact settlements, whether at city, town or village level, are important in terms of sustainable development and improving the quality and vitality of urban centres. The

Institute strongly supports policies set out in the Draft EMRA RSES encouraging sustainable and quality development of brownfield/infill lands in urban areas. Attracting people back to urban centres to improve the quality of life for those already living in the city centres and to improve the vibrancy and attractiveness of the city centre.

Subject to removal of the phrase “*and rural areas*”, the Institute welcomes Regional Policy Objective 4.50, which states “*In Development Plan Policy Local Authorities shall prioritise the regeneration of rural towns and villages through identification of significant ready-to-go regeneration projects for rural villages and rural areas which could harness untapped assets with community and wider private and public sector support and investment including the Rural Regeneration and Development Fund*”. The Institute similarly welcomes Regional Policy Objective 4.51, which states “*In Development Plan policy Local Authorities shall identify small towns and villages that have the potential for serviced sites as an alternative to one-off rural housing.*”

However, while Regional Policy Objectives 4.53 refer to spatial and need criteria for rural housing, the EMRA RSES must be clearer in expressing the need for strict adherence to the sequential approach for all housing, including rural housing. Specifically, it must be clearly outlined that housing serving rural areas, save for critical accommodation (e.g. unless necessary for the operation of a rural located enterprise), should take place in towns and villages. This will serve to attract people back to urban centres in order to improve the quality of life for those already living in city, town and other centres and in order to improve the vibrancy and attractiveness of urban centres.

Planning for Diverse Rural Places

The EMRA RSES must set out a more detailed strategy for rural areas if the goals of the National Planning Framework are to be achieved. Section 4.8 does not describe the actual roles of rural areas. It is acknowledged that, today and certainly by 2040, rural settlements will have a very different role than they had, for example 100 years ago (e.g. today rural villages are no longer centres of communication/trade, and may never be again). Bearing this in mind, the EMRA RSES must be clearer in defining what the EMRA envisages the changed role of rural areas by 2040 to be in the context of national planning policy in order enable local authorities to specifically plan for the successful delivery of and protection of these roles.

The key roles of rural areas could be summarised as follows:

- Areas with a clear distinction from urban areas in their character.
- Areas of rural population, rural employment and rural social character.
- Areas of recreation and tourism based on their resources and assets.
- Areas of high environmental quality.
- Areas of agriculture and equine economics.
- Areas that protect against climate change and areas that can adapt to climate change.
- Working areas that can accommodate renewable energy production.
- Areas of water resources.

It is critical that the EMRA RSES is clear on what makes rural areas distinct from urban areas so that this distinctiveness can be appreciated and maintained.

The Draft EMRA RSES does not acknowledge the interdependency of rural and urban areas. It is a fact that rural areas will, in the future, be the main sources of renewable energy and clean water required to supply urban areas. However, this is not acknowledged adequately in the Draft Strategy. The absence of this recognition makes it very difficult for Local Authorities to prepare, for example, renewable energy strategies. Without leadership to this effect, there will be resistance in planning for energy production over and above the needs of individual rural areas, unless there is a clear regional plan and clear pathways of return for local rural areas. It is suggested that a clear policy to support energy production as a viable economic sector for the rural economy be set out, along with commitment to the appropriate supports to achieve this vision.

While the Institute acknowledges that the protection of rural land for agricultural and forestry activity should be the primary land use management policy for rural areas, it is further acknowledged that the planning system has limited control over these sectors. With that in mind, at a minimum, Regional Policy Objective 6.8 must be strengthened with respect to landscape and built heritage and consideration given to how this can be implemented in practice. All of the major tourist strategies in recent years (e.g. such as that for Ireland’s Ancient East) are based on the wealth of historic features and landscapes in the region. In addition to their intrinsic value, contribution to our national identity, they are valuable economic resources. It is suggested that this objective is re-worded to state: “*Support Local Authorities to develop sustainable and economically efficient rural economies ... while at the same time ensuring the maintenance, protection and enhancement of the natural landscape and built heritage which are vital to rural tourism*”.

The Institute notes that Section 7.7: Landscape of the Draft EMRA RSES states: *“Although a number of Local Authorities in the Region have undertaken landscape character assessments, there remain gaps in coverage and inconsistencies in approach. The national landscape character assessment, when complete, will provide consistency in how we characterise and connect with the landscape, and provide a framework for regional and local landscape character assessments.”* Having regard to the important role for Landscape Character Assessment in underpinning spatial planning policy and land management, the completion of a National Landscape Character Assessment (including seascapes) and the publication of Landscape Character Assessment Guidelines for planning authorities should be pursued as a matter of urgency. It is important that the application of public policy, such as that set out in the *National Landscape Strategy for Ireland 2015-2025*, is consistent across all authorities at all levels in order to avoid confusion and a watering down of policy and in order to ensure effective implementation of the NPF and RSESs. This is particularly the case given the very tight time frame for the review of statutory plans after the adoption of the RSES.

Technical Queries and Comments

- While reference to specific projects (e.g. at Section 5.5) brings certainty at both the public and for investors, the plan does not consider what happens if key projects do not or cannot proceed. For example, what happens if the Water Supply Project for the Eastern and Midlands region is successfully challenged, what are the alternatives available?
- It is noted that Section 10.3: Energy references different renewable technologies. However, the Regional Policy Objectives do not reflect this and, indeed, only highlight off-shore energy resources (e.g. see Regional Policy Objective 10.19). This may have unintended consequences for the delivery of other technologies leading to delays and investor frustration. The RPOs should recognise all technologies that are offered support under the Government’s feed in tariff scheme.
- The Institute notes that anaerobic digestion under ‘Farming’ (Section 7.7, page 128). Consideration should be given to placing greater emphasis on anaerobic digestion and that its benefits in terms of water quality is noted. Having regard to recent EPA findings that there has been a net overall decline in the water quality in Irish Rivers between 2015 and 2017, simply referencing the Water Framework Directive and River Basin Management Plans does not appear to be effective.

Conclusion

The Irish Planning Institutes acknowledge the collaborative approach with stakeholders facilitated by the EMRA in the preparation of the RSES and support, in principle, the methodology and content of the RSES with the exception of the observations in regard to part of the detail of the document as outlined above.

The Irish Planning Institute appreciates the opportunity to give its views on the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region and would welcome the opportunity to meet and discuss the issues outlined above. If the Institute can be of any further assistance, please do not hesitate to contact us.

Yours sincerely,

Joe Corr MIPI
President
Irish Planning Institute