

IRISH PLANNING INSTITUTE

SUBMISSION ON NATIONAL SPATIAL STRATEGY

INDICATIONS TO THE WAY AHEAD - PUBLIC CONSULTATION PAPER

INTRODUCTION

The Irish Planning Institute welcomes the publication of the Policy Indications Paper as part of the process for the preparation of the National Spatial Strategy.

As we have stated in previous submissions the Irish Planning Institute greatly welcomes the initiative of the Government, the Minister for the Environment and Local Government, Mr Dempsey and his Department in undertaking the preparation of Ireland's first National Spatial Strategy.

The Institute congratulates the Spatial Planning Unit for the preparation of an excellent Policy Indications document and also for the extensive and very valuable research that has been undertaken on spatial planning issues and trends throughout Ireland.

The undertaking of a National Spatial Strategy will provide a very valuable framework to maximise the economic, social and cultural return from continued economic growth and substantial investment in the physical and social infrastructure nationally. Its relevance and importance is underlined by the fact that the steering group is formed by Assistant Secretaries of all Government departments. It is essential that this good work is continued and brought to a completion and fruition within as short a time period as is feasible.

The Institute firmly believes that the National Spatial Strategy should be meaningful, effective and implementable.

Whilst welcoming the document and the work that has been undertaken the Institute would like to suggest a number of issues which need to be developed further in the final document. Key points which arise include:

1. The Need for a Specific National Infrastructure Framework

The National Spatial Strategy document needs to be **specific**, not just in relation to designation of gateways but also in relation to the spatial implications nationally of specific infrastructure including:

- Roads
- Railways
- Ports
- Water and Sewerage Infrastructure
- Electricity
- Telecommunications including broadband

The NSS should also give a clear framework for detailed decision making in respect of investment in education, health and cultural infrastructure.

2. **Landscape**

A key element of the National Spatial Strategy should be the identification and protection of outstanding landscapes. These form not only an important part of our national culture and heritage but also a vital economic aspect for some of the most economically disadvantaged regions particularly on the western route.

It is essential that the NSS identifies the most important areas of outstanding landscapes nationally and has regard to them in defining the optimum location for Gateways and infrastructure investment.

3. **One-off Rural Housing**

Perhaps the greatest threat to the protection of Ireland's landscapes is the phenomenon of one off rural housing, much of it urban generated. This also gives rise to very significant implications for sustainability and the economic provision of services and infrastructure. The research work carried out as part of this study has underlined the scale of this issue. In excess of one-third of all housing are currently provided in the form of one off rural housing, a trend that would appear to be accelerating in many parts of the country. The National Spatial Strategy cannot ignore such an element of the spatial development of a country.

Whilst we understand there may be significant reluctance to go into great detail on this issue for fear of it acting as a distraction to the overall objectives of the strategy, the Irish Planning Institute submits that it is essential that the NSS sets out a clear policy framework for addressing the issue of one-off housing development. This should be complemented by a specific planning policy guidance paper on rural housing.

The Institute submits the issue of one off rural housing is the most significant planning issues which have yet to be addressed in policy terms at national level.

It does seem somewhat strange that this issue is not mentioned in Section 2.1 of the consultation paper which sets out "*spatial trends and issues*". Furthermore it

is not explicitly addressed in Section 3.3 – “*the environment and spatial balance*”. This section does make reference to the need to strengthen smaller towns and villages in their attractiveness as places to live to help provide an alternative to the increasing tendency for urban generated housing to be located in the open countryside. Whilst the IPI concurs with this approach, it needs to be complemented by specific policies to restrict urban generated rural housing.

4. **Gateways**

The Institute firmly believes that for the National Spatial Strategy to be successful in its key objective of achieving balanced regional development, only a small number of gateway towns should be selected rather than a large number of clusters or hubs. This is essential to ensure gateways achieve the necessary critical mass referred to in the consultation paper. Any diversion of this approach would result in the Spatial Strategy being unsuccessful and the continuing proportional growth of the Greater Dublin area and existing major centres at the expense of the rest of the country it is appreciated there are difficult political barriers to achieving this approach and we urge the study team to firmly pursue this gateway approach.

While we understand the need to ensure that all areas of the state benefit from infrastructural investment, we feel the use of the ‘Functional Areas’ approach, giving in effect something to each area, will disperse to too great an extent the available infrastructure and financial investment to a level which will slow down, or prevent, the establishment/strengthening of the major gateways.

5. **Implementation**

The second critical element of successful intervention in spatial development patterns, is the successful development of the gateways. They must be developed in a way which ensures that they have the necessary infrastructure and services and quality of environment to make them attractive alternative places to live and in which to invest. The development of a successful gateway is a major challenge and how this is achieved in practice requires very focused and detailed consideration.

The successful implementation of the strategy will be directly dependent upon the implementation measures which are put in place to achieve the development of gateways.

In particular the Institute submits that the Department of the Environment and Local Government should give detailed consideration to the establishment of appropriate development agencies for the development of gateway towns.

Existing local authority structures are struggling greatly at present to cope with the pressure for services and infrastructure and most would be unable to

adequately respond to ensure successful development of gateways without the radical restructuring or establishment of new agencies.

These Development Agencies should have strong links to existing local authorities. They should be fully effective, well resourced multi-disciplinary bodies focused on the physical delivery of gateway towns.

In the absence of the establishment of these effective new agencies it is unlikely that the gateways will succeed. The previous experience of rapid urban expansion and new town development in Ireland is not encouraging. It is well acknowledged that the significant difficulties experienced in the development of such areas as Tallaght, Lucan/Clondalkin, and Blanchardstown is in part due to the failure to establish appropriate development agencies for these towns.

One possible approach would be to designate the new development areas of all gateways as Strategic Development Zones which will be implemented by a dedicated development agency attached to the local authority. Simply zoning land and then expecting development to take place in a coherent and logical manner simply will at least result in largescale housing and industrial development without the appropriate transportation, community or social facilities and with an inadequate environment. At worst, it will not even lead to development.

There have been some very successful development agencies established in the past such as Ballymun Regeneration Ltd. and the Dublin Docklands Development Authority which might provide a model for the new gateway agencies.

The Institute believes that it is important that the mechanism for delivery of gateways be announced at the same time as the announcement of the specific gateways to prevent unrealistic expectations particularly on behalf of landowners and developers.

5. In terms of development restraint it is essential that a Managing Authority as proposed in the document, be established. The Managing Authority would:
 - Oversee the entire implementation of the NSS.
 - All development plans and local area plans prepared by local authorities and other agencies should be submitted to the Managing Authority. The Managing Authority will then certify that the plans comply with the NSS.
 - For plans that do not comply the Managing Authority will specify the changes which are necessary to ensure compliance and certification. Local authorities, city/county development boards and other agencies will not be able to formally adopt such plans until certification of compliance is issued. This would overcome the need for ad-hoc intervention by the Department of the Environment and Local Government as currently happens in the Greater Dublin Area.

The Managing Authority would also oversee the establishment and operation of appropriate development agencies for the gateway towns and ensure that funding is made available to enable front loading of necessary infrastructure.

The Managing Authority would also be responsible for ensuring that regional plans are prepared for each of the functional areas and that each regional plan also complies with the National Spatial Strategy.

The Institute would specifically support the following centres as gateways:

- Galway
- Limerick
- Waterford
- Cork
- Sligo (with links to Ballina and Enniskillen)
- Athlone (with links to Roscommon and other north midland towns)
- Dundalk (with links to Monaghan and Newry)

All Gateways should be linked by good rail and road links e.g. a rail service linking Sligo, Galway, Limerick, Cork and Waterford, and each should have a third level institution of university or enhanced institute of technology status.

The public consultation document sets out four questions which submissions are requested to answer.

In addition to the comments above we make the following specific comments on each question.

Question 1

Do the guiding provisions and principles set out in Section 1 represent a basis for balanced spatial development?

The Irish Planning Institute agrees that the principles of guiding visions as laid out in Section 1 represent the basis for balanced spatial development.

The guiding vision on principles is predominantly an economic vision. If the NSS is to be a holistic approach which embraces the concept of sustainable spatial development there will need to be a greater emphasis on social and environmental issues in addition to economic.

Question 2

Does viewing Ireland in terms of functional areas as set out in this paper, each of which has different characteristics and within each of which different issues arise provide a useful explanation for the basis on which the country functions spatially?

The Institute agrees that the map showing functional area sets out a useful explanation of the basis on which the country functions spatially at present. As with any such map, it somewhat oversimplifies the position and in particular underestimates the influence of the major urban centres of Dublin, Galway, Limerick and Cork in particular. It gives little indication of the strengths and weaknesses of the various areas.

However, the Institute believes that this is not necessarily a model for the future. The very substantial planned investment in new inter urban motorways will have a significant impact on spatial interaction and will alter the picture in respect of functional areas in the future. This will need to be taken into account in establishing the National Spatial framework. The number of functional areas should be reduced to 8 based on each of the gateways identified above and Dublin.

As a consequence, is it a valid proposition that different kinds of responses will be needed in different areas to achieve a more balanced regional development?

As the functional areas do not necessarily represent the optimum future of spatial functioning of the country, the Institute does not believe it is necessary to provide a specific response for each region. As previously stated it is essential to develop a limited number of gateways with a sufficient critical mass to compete with the Greater Dublin area.

Question 3

Will the development of functional areas be best served by a spatial planning approach which seeks to energise them by focusing on the strengths of a limited number of places in a way which at the same time, allows the functional area to realise their potential?

We agree that the spatial strategy should focus on a limited number of places although it is not essential that each of the regions identified in the functional areas map has a designated gateway.

Having regard to the population of the country it is questionable as to how many gateways can be successfully established.

Question 4

Is the range of indications for finalising the form and details of the final spatial strategy appropriate and comprehensive?

Our comments in respect of this question are set out fully above. In particular we emphasis the importance for appropriate implementation measures both in terms of the national managing authority and the establishment of appropriate agencies for the development of a limited number of gateways if the spatial strategy is to be successful in its key objectives.