

IPI Submission on the *draft* Sustainable Development Report, 2002, DoELG

While the Irish Planning Institute generally welcomes the spirit of the document, ‘Sustainable Development Report – Assessment, Review and Future Perspectives’, we would be concerned about the inadequate focus on spatial planning issues, and would make the following specific comments on the draft document:-

- We would support the view that the overall format of the report should give more emphasis to evaluating actual progress and results, rather than simply reviewing policy actions. The report should also make much more use of indicators. Without such analysis and indicators the Report appears unduly confident, or at least the confidence of progress is unsubstantiated. To this end, we would acknowledge that the availability of the EPA report, due shortly, should remedy this situation to a large extent. However, figures and indicators regarding one-off housing, etc. can already be gleaned from the National Spatial Strategy (NSS) background papers. While we would not suggest that this report should duplicate the content of the NSS, the Institute is of the opinion that support and complementary objectives should be contained in the Sustainable Development Report, so that both it and the NSS be mutually reinforcing documents/government policy.
- Notwithstanding the argument which may be made, that this document should be read as an addition to the ‘Sustainable Strategy for Ireland, 1997’, and even the National Spatial Strategy, when completed, the Institute strongly feels that the omission of a statement in clear support of ‘sustainable settlement patterns/strategy’ in lieu of un-coordinated, unplanned and unnecessary urban generated single houses in rural unserved areas would be most inadvisable, as it would send out a signal that the very clear (and helpful) statement of policy in this regard in the 1997 Document is no longer seen as Government policy. In our view, this omission would be extremely detrimental to the proper planning and sustainable development of the country with serious implications for environmental quality and ‘quality of life’ generally. In particular, planning authorities and an Bord Pleanála often in practice have to rely on the 1997 document in order to support planning decisions restricting the unsustainable spread of urban-generated housing into rural areas.
- Accordingly, the Institute strongly recommends that a statement be included in this Report which would recognise the importance of directing development to urban centres or strategically located smaller towns and villages, unless such development was directly related to agricultural or diversified rural sector activities. Urban generated housing in unserved rural areas must be

recognised and stipulated as being unsustainable. [It may be that a repetition of the statement of policy contained on pages 151/2 of the 1997 Sustainable Development Strategy would be sufficient in this regard, although it may be also appropriate to consider strengthening the content, in the light of the serious problems of excessive one-off housing that have been experienced since 1997 (and documented in the research reports for the NSS)].

- The Institute is of the opinion that the principles of sustainable development necessitate that planning authorities should influence the use of land and development in ways that:
 - - Minimise the environmental impact of development in terms of water quality pollution and visual amenities.
 - Ensure equality of access to employment and other social infrastructure.
 - Limit / Minimise the use of energy, particularly in terms of transport.
 - Make the best use of existing/ proposed resources.

To this end, the Institute is the opinion that a statement in support of this is critical in achieving this objective and providing the necessary support and guidance to local authorities and to An Bord Pleanála.

I hope that the department will be able to take these points on board in the finalisation of this draft document. I would be happy to arrange for representatives of the Institute to meet with you or your staff on this matter, if this is required.