

Draft RSES Submission  
Northern and Western Regional Assembly  
The Square  
Ballaghaderreen  
Co Roscommon

By Email to [rses@nwra.ie](mailto:rses@nwra.ie)

**Date: 8 February 2019**

**Re: Draft Regional Spatial and Economic Strategy for the North and Western 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 Northern and Western Region (RSES), as published in November 2018. The IPI has undertaken extensive consultation with its members on this subject, including a Policy Forum event held with Members living and working within the region; 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. In terms of the North West Region, the Institute recognises the diversity of the region, its distinct spatial patterns and diverse geographical propositions. The Institute acknowledges the historically low level of urbanisation in the North West Region compared to other regions, its proximity to the Border and the risks posed by Brexit.

### Key Points for Consideration

- The Institute sees Regional Spatial and Economic Strategies as heralding a new era of developing public planning policy in Ireland. The Institute feels the DRAFT NWRA RSES as currently published is somewhat unwieldy and difficult to navigate and would benefit from a clearer structure. While the Institute welcomes the consistency of policy outlined in the DRAFT NWRA RSES with the National Planning Framework, the Institute would encourage greater and more detailed focus on key priorities and how they can deliver on the national outcomes within the Region.
- The Institute welcomes the decision to draft a Galway Metropolitan Area Strategic Plan (MASP), with statutory backing. The Institute considers the Galway Metropolitan Area Strategic Plan could be greatly enhanced with more specific actions documented similar to that included in the Dublin Area MASP referenced in the EMRA RSES. The Institute feels the Galway MASP as published in the Draft NWRA RSES is lacking in detail and this will make it difficult to align development plans to the MASP.
- In order to ensure that the NWRA RSES is an effective vehicle 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 by local authorities and the NWRA 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 NWRA RSES encouraging compact growth, sustainable and quality development of brownfield/infill lands in urban areas and encouraging viable alternative options to rural housing through incentivising regeneration in the region's network of rural towns and villages.
- The Institute believes that specific objectives in relation to Galway City, Sligo and Letterkenny brownfield development would be beneficial. **PRC Recommendation is not to include local issues – given this, this should be deleted.**
- The NWRA 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 NWRA 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 sustainability of these roles. Notwithstanding the reference to rural housing development in the National Planning Framework, there is a requirement to compound the policy of restricting one off housing in the countryside and consolidate residential development around towns and villages to obtain the critical mass required to ensure the establishment of sustainable rural development.

## 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 NWRA-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 viable 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 viable and measurable against known benchmarks

With regard to the second item, it is of paramount importance the NWRA RSES will be capable of implementation. Given this, Regional Policy Objectives outlined in the NWRA RSES should be targeted and concise and avoid replication of the National Policy Objectives stated in the NPF. For example, further clarity is needed around Regional Policy Objectives 12 (*"Deliver at least 30% of all new housing within the existing built-up footprint of settlements with a population of over 1,500 (Excluding Galway Metropolitan Area)."*) and 13 (*"Deliver at least 40% of all new housing to be delivered within the existing built-up areas of cities, towns and villages, on infill and/or brownfield sites."*) to ensure consistent implementation.

Regional Policy Objective 18 should be reworded as follows: *"Local authorities to identify and prioritise a program for the provision of serviced sites within smaller towns and villages within 1 year of the adoption of the NWRA RSES. A rolling two-year implementation plan shall subsequently be prepared by local authorities."*

- Many 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. For example, several Regional Policy Objectives state that it is an objective to "support" certain actions (e.g. support the design of new/replacement/refurbished dwellings to high energy efficiency standards.). What exactly does "support" mean in this context? How will implementation of these objectives be measured?

### Need for a clear means of implementation

The Institute notes, as referenced at page 59 of the Draft NWRA 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 NWRA 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 Galway City and County) may provide for an additional 25% headroom.

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 NWRA 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 NWRA 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. 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, NWRA 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.

The Institute acknowledges the importance of the National Development Plan investment programme (urban, rural, climate and disruptive technology funds for example) in supporting the implementation of Project Ireland 2040 and the Regional, Spatial and Economic Strategies. The identified funding is only part of the challenge and further investment in resources is now an urgent requirement for local authorities challenged with implementing the NWRA Draft RSES.

### **Transport and Infrastructure**

The Institute believes that NWRA Draft RSES could be greatly enhanced by greater focus on infrastructure requirements for the Region to develop and meet the growth potential of Galway and **each** of the identified Regional Centres.

The draft document should clearly focus equally on the designated Regional Centres and not create circumstances where one centre is ranked over the others by virtue of the disparate descriptions that are used. Each centre has its strengths and opportunities for growth that benefits the potential of the wider region but this is the function of the regional centre strategic plans to establish in conjunction with the MASP for Galway.

### **Planning for Diverse Rural Places**

The NWRA RSES must set out a more detailed strategy for rural areas if the goals of the National Planning Framework are to be achieved. 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 NWRA RSES must be clearer in defining what the NWRA 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.
- 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 NWRA RSES is clear on what makes rural areas distinct from urban areas so ~~that~~ this distinctiveness can be appreciated and maintained.

The Draft NWRA 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.

The Institute notes that Section 5.3: Our Landscape of the Draft NWRA RSES states: *“It is important for this region that there is a more consistent approach to landscape characterisation and amenity protection measures applied to similar classifications across the region.”* 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.

### **Conclusion**

The Irish Planning Institutes acknowledge the collaborative approach with stakeholders facilitated by the NWRA 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 North West 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