



CHAMBERS
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**Chambers Ireland's Submission to the Department of Housing,
Planning, Community and Local Government on**

**The National Planning Framework:
IRELAND 2040**

March 2017

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Executive Summary

The National Planning Framework is an opportunity to set Ireland on the best path to a well-designed future of sustainable development and improved quality of life through effective spatial planning. Chambers Ireland is pleased to participate in this consultation process, through both our written submissions and as a member of the National Planning Framework Advisory Group.

Chambers Ireland is the largest business network in the State. With members in every geographic region and economic sector in Ireland, we are well positioned to understand the concerns of businesses and represent their views. Chambers Ireland welcomes the work of the Department of Housing, Planning, Community and Local Government in the drafting of a National Planning Framework for Ireland to the year 2040. We also welcome the opportunity to inform this consultation process and look forward to further engagement with the Department as the development of the Framework progresses. Chambers Ireland has been working to ensure that our network of chambers located across the country is engaged with the drafting of the National Planning Framework and we will continue to do so as it is developed and implemented.

In the absence of a clearly defined and managed spatial strategy for the country government investment in regional job strategies, transport, communications and other capital infrastructure projects cannot ensure that economic development will be appropriately located, effective or sustainable. A national spatial strategy will provide a strategic context for the development of regional economic and spatial strategies.

In this submission to the Department of Housing, Planning, Community and Local Government, Chambers Ireland sets out our vision for the Framework and how it should guide planning and policy until the year 2040. Chambers Ireland is asking for an ambitious, holistic and development-orientated approach to policy making, spatial planning and governance in the Framework.

The first section in this document outlines the kind of place that we would like the Framework to deliver in the Ireland of 2040, followed by a strategy based on city regions as drivers of growth as a means to get there.

The second section highlights the infrastructure needs of greatest importance to business, in which strategic and well-planned investment is most needed. In order to enhance the quality and effectiveness of national infrastructure policy, projects should be fully integrated to an effective and ambitious national macro-spatial plan.

The final section makes recommendations on the governance mechanisms that will be required to ensure the implementation and success of the Framework. For the Framework to succeed it is vital that there is political commitment, nationally, regionally and locally to its implementation.

Section 1:

The Ireland of 2040

Chambers Ireland would like Ireland in the year 2040 to be a place where businesses and people can thrive and where vibrant cities reflect their competitive regions as great places to live and do business. This can only be achieved through effective planning which recognises where growth can and will occur, while also encouraging differentiations. Ireland should be open for business and remain a competitive location in the global economy over the coming decades and the Framework must strive to achieve this.

We would like to see the Ireland of 2040 be a country with a flourishing economy and society that offers opportunity and a high quality of life for all, achieved through well-designed macro-spatial planning and coordinated policy-making which enables sustainable and effective growth.

Quality of life is an asset and it is vital that the National Planning Framework mandates a holistic approach to investment and planning decisions which takes careful consideration of placemaking and liveability. If we are to continue to attract and retain talent in Ireland quality of life must be thought of as a public good and have appropriate resources allocated to it. Quality of life is not a one-off investment, but rather demands careful planning, evaluation and maintenance by policy-makers.

The challenges

Ireland's recovery from recession over the last decade has been characterised by unevenly distributed economic activity across the country and as we continue to grow we face the legacy issues of underinvestment in infrastructure and a capital city that is currently under enormous pressure as it drives growth in increasingly more areas surrounding it.

With projected increases in population, likely to be located in mostly city regions, issues such as urban sprawl and the continued migration of people from rural Ireland will face Ireland over the coming decades.

These trends mean that Ireland's city regions must be supported to thrive in the face of such emerging pressures. Cities which are capable of supporting the regions in which they operate must be enabled to grow in a manner that is sustainable, effective and competitive.

Dublin now affects a huge area around surrounding the city as more and more counties are becoming commuter-belts serving the city as it grows. Such growth requires strategic planning and as we aim to encourage sustainable growth in Ireland's other city regions, we must learn from the issues now facing Dublin and the Greater Dublin Area in housing, transport and planning.

Challenges such as climate change, infrastructure deficits, skills gaps, and competitiveness issues must also be addressed by a national spatial strategy. These issues will only be tackled by a framework that is holistic and takes into account quality of life, environmental, economic and societal issues in tandem and at national, regional and local levels.

Coordination and connectivity will be essential in addressing the challenges facing Ireland and in planning for the future. Considerations by the Framework on quality of life must also reflect population projections and consider where people are likely to live and work now and in the future. The integration of policies at all levels in order to coordinate spatial planning is required: we must have a clear vision of how we want Ireland to grow and progress, as well as how best to enable this.

Drive Regional Economic Development

A primary focus of the National Planning Framework must be to facilitate and support the effective and sustainable economic growth of Ireland's regions in a way that reflects trends in population movement and the distribution of economic opportunities.

An issue which has plagued planning and investment in Ireland in the past is the idea that one region's gain is another region's loss. Investment and planning must not be seen as a zero-sum game with one area gaining at the expense of another. Ireland is relatively a very small country, and as such the interrelationship between places in a regional ecosystem is significant. We must recognise the interdependence and connectedness of Ireland's villages, towns and cities, while acknowledging that the same plans will not work across the board and specialisation and differentiation are to be welcomed.

The idea that the entire country can grow at the same pace is unrealistic, but we can work towards a framework that plans effectively how those areas experiencing the most concentrated growth can feed into and benefit their wider regions. We must encourage investment and planning that reflect regional differentiations in a variety of areas, from industry specialisation, to the protection of unique natural resources and environments.

As part of the consultation period, Government published an Issues Paper with suggested proposals on how the National Planning Framework would be designed and implemented. Chambers Ireland is supportive of the Issues Paper in its outline of the need to support city regions as the drivers of growth of the country. The successful economic development of Ireland's regions is dependent on how effectively we leverage city regions as the drivers of growth. The Framework must create a strategy that ensures that each region can harness its distinctiveness, unique assets and comparative advantage to drive development and differentiate Ireland's regions. The National Planning Framework should set out a clear strategy for regional economic development based on the concept of each region fulfilling its full and unique potential for growth.

Chambers Ireland would like to see an approach to planning which acknowledges that increased density and concentration of people in particular areas is the best and most efficient way to ensure greater quality of life for the country's inhabitants reflected in the Framework. Building upwards rather than outwards in Ireland's city regions can help us avoid the problems related to urban sprawl which the Dublin region is currently facing. Ireland's city regions are drivers of growth and Chambers Ireland takes the view that these areas must be adequately supported and enabled to grow in a way that benefits the regions.

Past attempts to achieve the concept of "balanced growth" have not served national planning well, and we must ensure that the Framework supports the areas where growth is already occurring. In attempting to prosper as a nation we cannot ignore the areas in which jobs and people are located. The Framework should work to address the pressures facing city regions and work towards ensuring that growth in a city can benefit the region in which it operates.

Developing Rural and Urban Ireland

Coordination: The National Planning Framework is not only about realising economic potential, but also quality of life issues affecting urban and rural dwellers in Ireland. The concept of placemaking and a holistic and coordinated approach to planning are required to support increased quality of life and sustainable development. Chambers Ireland would like to see the Framework coordinate a broad scope of policy areas that will ensure well-rounded spatial planning that will enhance people's lives, communities, environments and the business landscape of the country.

The role of cities and towns and their interrelationship within a regional ecosystem should be clearly and effectively planned for within the Framework. Chambers Ireland believes that the National Planning Framework must approach spatial planning in a way that recognises the interdependence of the regions and cities to one another and effectively manages these relationships in a way that enables cooperation and coordinated, sustainable and inclusive growth.

Spatial planning strategies should align sectoral strategies across transport, communications, public services and all public policy areas so as to reduce duplication and increase effectiveness and enforcement. When spatial planning strategies are effectively coordinated, they help to facilitate inward investment, stimulate the growth of indigenous industries and ultimately support the creation of sustainable communities for people to live in.

Connectivity must be brought to the fore in the National Planning Framework. Ireland's regions stand to benefit greatly from enhanced connectivity in a variety of areas. From ensuring physical connectedness between and within Ireland's cities, towns and regions, as well as between Ireland and the wider world, to connecting rural Ireland to high speed internet access that can support growth and jobs, and ensuring connectivity to safe and stable supplies of water and energy for businesses and homes, connectedness should be a vital element of planning for our future.

Enhanced connectivity can ensure that areas are not left behind; while all towns and villages in Ireland will not grow at a uniform pace, connectedness to drivers of growth can benefit the wider areas in which they operate. The capacity of cities to grow at a fast pace has already been witnessed in Ireland with Dublin experiencing rapid growth which has hugely affected the surrounding counties and even further afield. Without effectively planning for how such growth will affect the region we risk repeating the unsustainable growth patterns of the past.

As much as cities can drive regional growth, the role of rural Ireland in supporting this growth must not be overlooked. Ireland's towns and villages also have an important role to play in creating the Ireland we would like to see in 2040, however these roles will differ from place to place and should not be approached in a uniform manner. Regional uniqueness and connectedness stands to benefit both city regions and rural Ireland, and the National Planning Framework should strive to accentuate each region's assets and potential.

Section 2:

Promote Strategic Investment & Quality of Life

Planning and investment in new infrastructure will be essential to meet the needs of Ireland's changing demographics. Current population predictions highlight that there will be future challenges in terms of population growth and a changing age profile within our population. Changing demographic pressures can be forecasted and provision can be made through infrastructure planning to ensure service provision will be sustainable and meet the needs of the changing society, enhancing quality of life for all.

The National Planning Framework provides an opportunity to address climate change, energy and water security challenges and the need for increased infrastructure development, all of which are inter-related challenges. The Framework must articulate a clear picture of the planning principles that will influence and shape future infrastructure investments. By clearly articulating a national perspective on what infrastructure and investment is required and where it needs to be located, the Framework will help build public trust and social support amongst citizens and communities for nationally important infrastructure.

Physical infrastructure plays a vital role in determining quality of life and the attractiveness of place as a location in which to do business. Sustained and strategic investment in infrastructure is vital in keeping costs of living down, supporting people to have affordable and well-planned places to live in, which are near a good job, while ensuring that there is a means of transport for them to get to work, enjoy their leisure time, be supported by good public services, and have a good and healthy quality of life. Well-planned and developed infrastructure can increase the mobility of people and goods, reduce travel time and increase productivity.

Quality of Life is not an abstract idea that we aspire to; today Ireland is ranked against other countries on the basis of quality of life, and businesses' investment decisions are made taking quality of life and infrastructure into account. Quality of life is an asset; people seek this out when choosing the places in which to live and do business, it is tangible, traded, ranked and desired. Quality of life means a great deal to today's worker; it shapes who we get and who we lose in the country and therefore must be a key consideration of the Framework.

Identification and sequencing

The National Planning Framework must set a best practice mechanism for the identification of priority infrastructure projects that are crucial for the economic development of the country. In conjunction with a defined process for the identification of strategic national

infrastructure priorities, the Framework should set an optimal sequence and strategic economic plan for the rollout of major investments. With constrained resources available for capital investment relative to our national requirements for the foreseeable future, the Framework has an important role to play in setting out national priorities for our future infrastructure investment in the shorter term and a strategic direction for the longer term.

The sequencing of projects will be important taking into account that the first few years following publication will be a litmus test for public support for the National Planning Framework. The success of the Framework will be linked to the realisation of goals and the tangible achievements of the first few 'catalyst projects' undertaken, and as such sequencing and prioritisation will be an important element of 'getting it right'.

A lack of public acceptance of infrastructure development plans would pose a risk to the development and completion of economically important projects. Public resistance to infrastructure identification processes and strategically necessary infrastructure projects could undermine development in certain areas and lead to an imbalanced infrastructural landscape. In setting a process for the strategic identification of important infrastructure projects, the Framework can benefit from ensuring that the right investment decisions are made and that value for money is achieved, as well as benefitting from greater public acceptance of project location and impacts.

Key infrastructure recommendations

Connectivity and coordination must be central to infrastructure planning for the future in order to avoid the mistakes of the past. The National Planning Framework should provide a structure which will ensure that investment decisions across all types of infrastructure projects support one other in a sustainable manner and incorporate technological advancements for the benefit of Irish society. Priority projects must be identified in the areas of transport, energy, water, broadband and housing. It is essential that the National Planning Framework is incorporated into existing infrastructure plans, including the 2017 Capital Plan Review, and that all future development of capital and social infrastructure plans be coordinated under the remit of the Framework.

The Framework should ensure that such significant investments in infrastructure are ambitiously future-proofed and dynamic enough to incorporate recent and future advances in technology. Data, the digital economy and 'smart infrastructure' must be enabled and encouraged by the Framework as they play an ever greater role in quality of life and efficient planning.

Transport

As Ireland's economic centres continue to grow, so too must the transport connectivity within and between them. Enhancing connectivity across Ireland's regions must support drivers of economic growth, but must not lead to isolation or a lack of connectedness for

rural Ireland. Investment in expanding, upgrading and improving the connectivity of Ireland's transport infrastructure is essential in the short term. Strategic plans will be formed in line with future spatial planning decisions and will be extremely important for economic growth and the ability to do business. Ireland's tourism industry, import, exports, and our ability to attract FDI will all be compromised without effective planning in the development of transport infrastructure.

The National Planning Framework should include consideration for the continued need to repair the current transport infrastructure stock along with investment in new projects. Upkeep and maintenance of existing infrastructure is vital in preventing the depreciation of transport networks. Future capital investment planning should require a focus on ensuring investment in maintenance and repair of transport infrastructure is safeguarded, along with the development of new projects.

Energy

The importance of protecting Ireland's energy security is likely to increase in the coming years along with increases in demand. Improving and expanding Ireland's grid infrastructure must therefore be prioritised to ensure our long-term energy security and to address the sustainable delivery of future energy needs, recognising the need for secure energy sources during the transition to a low-carbon economy.

Plans must provide for a secure and consistent energy supply for the country. In line with commitments on climate change, energy planning will require a focus on infrastructure which will meet our long-term renewable energy needs of the future. The National Planning Framework must ensure that the planning system can deliver the energy infrastructure to support sustainable economic growth into the future, while also supporting the phased decarbonisation of Ireland's energy supplies as part of a long-term solution.

The Framework should approach energy in a way that will allow Ireland to differentiate itself in its approach to solving problems through the efficient use of sustainable technology in all areas of planning. Ireland has the chance to be a world leader in energy and should strive to achieve best practice planning in sustainable use of energy as we grow and continue to build.

Water

Ireland's water infrastructure must be upgraded to the necessary standards of a developed country. The water supply in certain parts of the country is currently extremely vulnerable and at risk. Failure to implement an appropriate, sustainable investment system for water may see Ireland faced with unnecessary fines from Europe and inadequate investment in this essential resource. It is now clear that maintenance and repair work alone is nowhere near an adequate solution for the secure supply of water in many regions. Priority projects are required to ensure that Ireland has a secure, safe and sustainable water supply and

modern waste water systems. Water supply and waste water provision are essential for business and for the economic competitiveness of the country, particularly in our large urban areas.

Broadband

Next generation broadband provision is essential for Irish business to compete and to trade internationally. Accelerated investment and is required across the country to reduce the pronounced digital divide that currently exists between urban and rural areas, and to enable Irish businesses to compete internationally and on a level playing field. Improved broadband infrastructure nationally will enable rurally based entrepreneurs to establish businesses and create employment opportunities in their own localities. The roll out of broadband across the country has enormous potential to connect rural Ireland and to ensure that everyone has access to the opportunities of the online global marketplace.

Social Infrastructure

Spatial planning provides an opportunity to strategically identify the social infrastructure needed to address quality of life and business issues across Ireland. Through analysis of demographic trends the National Planning Framework can assess and make provisions for the childcare, education and skills, healthcare, elderly provision and quality of life needs of the future.

The projected changing age demographics of the country, along with increasingly smaller household sizes mean that Ireland will be faced with new challenges associated with these. Addressing housing needs within our main urban areas is a key challenge both now and for the future. Greater density of population in a number of areas is one way in which we can ensure the services and facilities needed for our future population are sustainable and of the highest quality.

The 'Rebuilding Ireland' action plan has outlined the strategy for increasing the housing supply by 2021. This plan should be reviewed following the publication of the National Planning Framework and if necessary revised in accordance to the spatial planning decisions outlined. Ireland needs to have a housing stock that reflects the various stages of life of its people and the Framework should therefore take into account demographic forecasts in conjunction with other areas of planning to ensure quality of life and access to high quality and strategically located facilities for all ages.

Sustainability, Climate Challenges and the Environment

A focus on sustainability and future-proofing is important across all decision making and policy development. As such, the National Planning Framework should reflect the important role spatial planning plays in ensuring the wellbeing of our environment, recognising the benefits that densification can offer in creating sustainable places. Putting sustainability at

the heart of the Framework will enable enhanced plans for policy measures on climate mitigation and adaptation. A focus on sustainability and the long term viability and climate impacts of infrastructure developments should also be a key consideration of the Framework.

The Framework must take into account our international and European Union obligations to move towards a decarbonised economy and provide a structure to ensure that infrastructure development is sustainable and helps rather than hinders, our ability to meet international and European climate obligations.

Climate change and extreme weather events increasingly pose risks to how we live and do business. It is important that Ireland's planning system is adaptable and responsive to future climate challenges and that mitigation plans are in place across the country to ensure that climate and weather risks are not detrimental to our economic growth.

Ireland's unique natural landscapes, wildlife and environment are important national assets that must be protected in the National Planning Framework. Our ability to enhance quality of life, as well attract visitors from abroad are strongly connected to our Ireland's vibrant and varied natural environment and the Framework should take into account adequate protections for Ireland's natural assets and coastlines.

Section 3:

Implementation and Governance

How the National Planning Framework is implemented will be as important as the steps taken to prepare and design it. In order for the Framework to truly effect change, significant emphasis must be placed on developing a robust governance and implementation structure.

Learning from the National Spatial Strategy

Amongst the key failures of the National Spatial Strategy as have been identified by experts in the field, were that it sought to be all things to all people and lacked political support at all levels. The National Spatial Strategy was not aligned with regional strategies or specific national strategies; it existed in isolation and was not properly implemented. Additionally, it was not sufficiently coordinated with regional development strategies in Northern Ireland to adequately support cross-border communities when it came to planning, infrastructure and investment. In developing the National Planning Framework we must learn from the National Spatial Strategy and improve upon the approach to the governance and implementation of the Framework in particular.

As part of the consultation period, Government published an Issues Paper, “Ireland 2040 Our Plan: Issues and Choices” with suggested proposals on how the National Planning Framework would be designed and implemented. These proposals have acknowledged that wider political support and institutional commitment is central to ensuring the Framework can guide public policy across Government, the Regional Assemblies and Local Authority administrations. The National Planning Framework must be absorbed and implemented by all levels of government in order to succeed and realise the potential for Ireland by the year 2040. Multilevel buy-in and ownership of the Framework will be essential for this to occur.

Chambers Ireland welcomes proposals that the Framework will be complemented by more detailed regional spatial strategies, which will align with and compliment the Framework itself and ensure that regional priorities feed back into it.

Recommendations

We welcome many of the proposals outlined in the Issues Paper in relation to the governance and implementation of the National Planning Framework. It is the view of the Chambers Ireland that for the Framework to have the necessary impact, the following characteristics will need to be central to the implementation strategy of the Framework:

Co-Operation

The National Planning Framework affords Ireland with the opportunity to support more effective regional, national and indeed all-island coordination and integration across a wide scope of stakeholders. Chambers Ireland recommends that the successful implementation of the National Planning Framework will require regional and national strategies to be aligned and developed in close co-operation, and should include strategies on economic development, environmental protection and sustainability, decarbonisation, transport and energy infrastructure, broadband, flood defence and cross border cooperation.

There must be greater levels of inter and intra regional communication, cooperation and coordination in order for each region to successfully differentiate and develop itself. The interdependence of places to one another must not be forgotten and the effective management of growth in a region will require stakeholders to engage with one another and with their neighbours in order to effectively plan and coordinate.

Political Support

One of the most important lessons learned from the past experience of the National Spatial Strategy is that without political buy-in from elected representatives, any spatial planning framework may fail due to potential resistance at local level regarding planning decisions. It is imperative that the political process is properly engaged, both in the design and implementation phases, so that planning decisions taken at regional and national levels have adequate political support. Therefore, a Government led change in political culture and buy-in is required if the National Planning Framework is to succeed where the National Spatial Strategy did not. Chambers Ireland welcomes the proposal outlined in the Issues Paper which seeks to address political and institutional commitment by underpinning the Framework by statute under the Planning and Development (Amendment) Bill 2016.

Communication to the public on the drafting and implementation of the Framework will be an important component in its multilevel political acceptance. As the Framework is drafted, finalised and implemented its success will be inextricably linked to how it is communicated and received by the public. Communications on the National Planning Framework should therefore be carefully planned and adapted where necessary.

Support must be sought at all levels of Ireland’s political system, from local to national, in order to ensure that the Framework has support well beyond its publication and that implementation of the Framework will not be met with political resistance at a later stage.

The National Planning Framework cannot succeed without adequate funding allocation for the plans it outlines. Therefore Chambers Ireland recommends a clear vision be developed on how spatial plans can be funded and supported, both at a national level and within the European Union.

Flexibility & Dynamism

Chambers Ireland recommends that the National Planning Framework be designed in a way that is flexible and can respond to unforeseen changes and challenges, both foreign and domestic, which have consequences for planning, infrastructure and economic policies. This can be done through regular and clearly defined reviews of the Framework with regard to its outcomes and whether or not it is meeting its targets. Ireland is currently facing many external uncertainties and the Framework must allow in its review processes a mechanism to respond to significant changes in conditions.

Given the rapid rate of change in technology Chambers Ireland recommends that the Framework be dynamic enough to adapt to new technologies as they emerge and evaluate their role in planning for Ireland’s economy and society where appropriate. The digital economy and innovations in technology are continuously driving forward change and we would like to see the Framework allow for and enable Ireland to grow in a technology-inclusive manner, incorporating and adopting innovation where beneficial.

Compliance

Without the use of financial incentives, or indeed, financial sanctions, there is a risk that the National Planning Framework will become just another document referred across departmental policies, without any of its strategies truly engaging with the targets set out within the Framework. Chambers Ireland welcomes the indications given in the Issues Paper that cross-departmental and agency co-operation will entail a ‘bid-style’ system for department or agency applications for targeted funding under the Framework. Similarly, the establishment of a National Planning Framework Management Team should further strengthen and incentivise inter-departmental co-operation along with the introduction of this bid-based system for targeted funding.

Regular Assessment and Ongoing Dialogue

In line with our own previous recommendations, a cross-departmental approach, with a regular period for assessment via an independent monitoring mechanism that reports to the Oireachtas will be instrumental in ensuring that the National Planning Framework can evolve and be adapted as required. This will be particularly important as Ireland prepares to

address a number of external risks, the nature of which will only become clear in the years to come. The UK's decisions to exit the European Union, changes in dependency ratios, the under-supply of housing, climate change, and external threats to our competitiveness are just some of the risks facing our economy. While it may be possible to develop long-term mitigation plans for some of these challenges, the nature of others will only become clearer in the years to come.

We recommend that as part of the implementation of the National Planning Framework, those charged with independently monitoring its progress should regularly and proactively engage with stakeholders who can provide insight on the progress of national and regional development strategies. An independent monitoring mechanism for the Framework must be established to identify and measure its effectiveness and the outcomes of implementation. This should be reflected in an annual report on the Framework to Government and the Oireachtas, delivered within three months of each period end.

Conclusion

The National Planning Framework is a significant opportunity for Ireland to effectively plan for a vibrant future in which our economy and society can flourish and grow, up to and beyond the year 2040.

Chambers Ireland has in this submission outlined the Ireland we would like to see in 2040, along with the roadmap that the National Planning Framework can deliver for the next two decades in order for Ireland to enjoy sustainable, inclusive and effective growth across the country.

For the Framework to succeed it is vital that there is acceptance and consensus among stakeholders on the approach and implementation of the plan. Chambers Ireland takes the view that this Framework is a chance for Ireland to increase quality of life, competitiveness and development across the country and welcomes the work of the Department of Housing, Planning, Community and Local Government in the drafting of this vital piece of policy.

The success of the National Planning Framework will depend on its acceptance at local, regional and national level and Chambers Ireland will therefore work with our network of chambers, located across the country in towns and cities of all sizes, to engage with the Framework over the course of its development and implementation.

It is vital that we cease to view economic development as a 'winner-takes-all' process and begin to recognise the interdependence and connectedness of Ireland's villages, towns and cities in supporting one another. Through effective, evidence-based and well-managed spatial planning we can ensure that Ireland in 2040 is a prosperous, desirable and inclusive place in which to live and do business.