**Ireland’s New National Planning Framework: (re)balancing and (re)conceiving planning for the twenty-first century?**

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**Abstract**

This Practice Forum paper examines the recent evolution of national spatial planning in the Republic of Ireland, focusing on the recent publication of National Planning Framework (NPF) in 2018. The NPF is Ireland's second national strategy for spatial development and represents a further shift away from traditional land-use regulation towards broader-based strategic spatial planning. In this short commentary, we reflect on official perspectives regarding the role that planning should perform in a period of significant social, economic and environmental change, and how planning policy conceives of 'balance' between competing priorities in the 'public interest'. The NPF represents a significant advancement on its predecessor, by deepening the reach of planning policy and positioning planning more centrally as a spatial coordinator of an array of public policies. However, the constitution of 'balance' advanced in the NPF is one weighted heavily in favour of economic development, with a notable restraining of attention allocated to environmental concerns and enhancing place-based qualities. Thus, while planning is ultimately justified by advancing the 'public interest' through finding balance between the oft-contending interests of society, economy and environment, the form of balance advanced in the NPF is one which recalibrates planning activity as development enablement.

**Key words:**

*Spatial planning; Public interest; Ireland*

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**Introduction**

Planning is a complex and difficult to define endeavour that is context specific in its aims yet universal in its objective to advance the ‘public interest’. However, the ‘public interest’ is a slippery concept subject to use, abuse and the vagaries of politics, business and bureaucracy. Hence, it has proven a much-debated reference point for planning. Indeed, so fraught with perceived problems is reference to the ‘public interest’ as a justification for planning that many now view it with some cynicism (Sandercock, 1998), preferring instead to frame the legitimation of decisions from within favoured discourses of evaluation that foreground alternative schemas for measuring success. Hence, we hear planning criticised by those on the right as unwarranted regulatory interference in the market that retards growth, while those on the left castigate planning for an increasing drift towards free-market capitalism that privileges efficiency and expediency over equality and equity (MacLaran, 2014). Nevertheless, the frontline of planning is generally a more nuanced picture where we find a complicated story in which those charged with formulating policy seek to ‘balance’ a variety of often competing concerns and viewpoints across society, economy and environment as they try to advance a particular interpretation of the ‘public interest’ (Lennon, 2016). Accordingly, how this ‘balance’ is established and measured ultimately constitutes and calibrates planning as a legitimate activity. Thus, to examine how such balance is sought – what is included, excluded, implied and made explicit – reveals much about how the role of planning is conceived within a particular society, and consequently provides insight to how values are reflected in agendas and given traction through institutional hierarchies. In this sense, exploring the search for ‘balance’ in planning supplies a mirror for contemporary society that reveals what lessons have been learnt from the past, what issues are currently favoured, and what topics are comparatively neglected. It is in this context, that the production and publication of the National Planning Framework (NPF) for Ireland provides a key moment for reflection on official perspectives regarding the role planning should perform in a period of significant social, economic and environmental change. Indeed, the NPF states that, ‘Too often in the past our policies and actions have sought to elevate one idea over another’ (p.10), such that the much-trumpeted new approach ostensibly seeks a departure from such past mistakes by ensuring that ‘Sustainability is at the heart of long term planning and the National Planning Framework’ (p.19). However, the particularities of what this means and how this is to be realised requires a careful excavation of the plan’s many policies, illustrative case studies and interlacing discourses. In essence, it requires unearthing what conception of ‘balance’ is advanced, and consequently if, how and in what ways planning is re-imagined and positioned as an activity relative to the conceptual fulcrum of ‘balance’. However, to appreciate how the NPF conceives (or reconceives) the role of planning, it is necessary to first briefly outline the nature of the Irish planning system before reviewing the journey national level planning has taken in Ireland since it emerged in 2002 with the National Spatial Strategy.

**The Irish Planning System**

In terms of broad system typologies, the Irish planning system closely resembles the British system as various comparative studies point out (Booth 1996; CEC, 1997; Nadin and Stead, 2008; Newman and Thornley, 1996). The original planning system was only introduced in 1963, establishing at a local authority level land-use regulatory instruments based on the formulation of land-use development plans and discretionary development control. Within this discretionary system, in contrast with many continental European countries, plans are not legally binding. The current system has been largely shaped by the Local Government Planning and Development Act 2000, which modernized the original system of planning in the face of rapid economic and physical development during the so-called Celtic Tiger era. The 2000 Act put in place a system that was based on the ethos of sustainable development (broadly conceived), and was more strategic in scope covering national, regional and local levels (Grist, 2003). While the Act did not create a statutory national plan, it put in place a regional tier of planning which provided the implementation mechanism for the National Spatial Strategy (NSS). The key components of the three-tiered system now in operation in Ireland are summarized in the table below, which shows the various levels and the key planning instruments therein.

<Insert table 1 here>

Planning policy and legislation is overseen at national level by the Minister for Housing Planning and Local Government and the Department of the Housing, Planning and Local Government. The former National Spatial Strategy NSS and the current National Planning Framework provide the overarching spatial planning framework for the country. The Minister can direct local authorities to take on board the policies contained in the National Planning Framework or in Regional Spatial and Economic Strategies. In this respect the Minister can intervene and directly shape the policy at lower levels of the planning system.

The centralizing tendencies in Irish planning are exacerbated by the weak role of the Regional planning tier. There are no strong structures for regional governance and there is little allegiance to the region as a concept (Breathnach, 2014). Eight Regional Authorities were responsible for translating the National Spatial Strategy into Regional Planning Guidelines (RPGs) covering the period, 2004-2016 and 2010-2022. However, in 2015, the Regional Authorities were replaced by three Regional Assemblies – in both cases these regional bodies are not directly elected, but members are appointed by the constituent local authorities from their elected councillors, where their main allegiance lies. The Regional Assemblies are currently drafting new Regional and Spatial Economic Strategies to provide a long-term regional level strategic planning and economic framework in support of the implementation of the National Planning Framework. The National Planning Framework has included a provision for the preparation of Metropolitan Area Strategic Plans for each of the five cities and these will also drafted by the Regional Assemblies in conjunction with the respective local authorities.

**From National Spatial Strategy to National Planning Framework**

Published in 2002, the National Spatial Strategy (NSS) was Ireland’s first attempt to formulate a national approach to spatial planning and development. The NSS set out a twenty-year planning framework designed to achieve a better balance of social, economic, physical development and population growth on an inter-regional basis. The strategy itself reflected Ireland’s economic performance at this mid-point in the so-called Celtic Tiger era. While Ireland’s initial economic success from the mid 1990s to early 2000s was based on foreign direct investment, low corporation tax and an expanding IT and financial services sector (Breathnach, 1998; Clinch et al. 2002), from the early 2000s the economy increasingly became heavily reliant on the construction sector and a speculative property boom (Kelly, 2010). As Whelan (2010) highlights, as annual house construction soared from 19,000 in 1990 to 93,000 in 2006, building construction became the dominant sector in the Irish economy, accounting for 13.3 per cent of all employment (the highest share in the OECD). Much of the focus of the NSS was thus on guiding the location of new housing development within the context of a rapidly expanding economy.

As recorded by Scott (2004) and Davoudi and Wishardt (2004), the NSS was clearly influenced by the European Spatial Development Perspective (ESDP) (Committee for Spatial Development, 1999), both conceptually and in adopting the EU spatial planning discourse. This reflected a wider turn to spatial planning within planning systems traditionally focused on land-use regulation to embrace a broader role of spatial coordination (see also Nadin, 2007; Nadin and Stead, 2008; Clifford, 2013). In this regard, ESDP-promoted concepts such as encouraging balanced spatial development, a new urban-rural relationship and polycentric development, can be detected throughout the spatial framework. In particular, the NSS marked a shift away from local land-use regulation towards greater emphasis on the spatial coordination of public policy and investment decisions with an explicit spatial context, and to establish a national platform for the production of regional spatial plans. Set against this backdrop, the NSS comprised three key elements. Firstly, the NSS aimed to promote a more efficient Greater Dublin Area, based on urban consolidation, reduced urban sprawl and improved public transport. Secondly, the Strategy designated strong ‘gateways’ in other regions. Balanced national growth and development was to be secured with the support of a small number of nationally significant urban centres that have the location, scale and critical mass to sustain strong levels of job growth in the regions. Controversially, eight gateways, and subsequently two additional gateways were identified, extending significantly the number of growth centres beyond the four originally envisaged (Government of Ireland, 2000). Thirdly, the Strategy also identified nine medium sized ‘hubs’, which were to support and be supported by the gateways. It was conceived that these would provide employment and service anchor points for wider rural areas. As Murray (2003) highlighted, the NSS was very much skeletal in design, supported graphically by a series of outline maps illustrating polycentric clusters of linked urban centres, transport corridors, and strategic rural assets, such as green belts, within metropolitan regions.

In both the lead up to the publication of the NSS and in subsequent years, the issue of regional balance emerged as a key political struggle, both as a goal and also how best to achieve this. As Clinch et al. (2002) observe, while many perceive that Dublin is the only city in Ireland that is of sufficient size to compete at a European level, ‘policy makers are continually faced with the question, explicitly or implicitly, how much national economic growth should be traded off for a better regional balance?’ (2002, p. 96). The designation of a much greater number of gateways than originally envisaged, alongside emphasis on an inclusive approach to designating hubs, suggests that concentrated development was politically unpopular. Indeed, policy initiatives in the years following the publication of the NSS appeared to indicate a further dilution of any attempts to guide development to a select number of urban centres. For example, the government announced a civil service decentralisation scheme in 2003 to relocate 10,300 civil and public service jobs to 53 urban centres across 25 counties. Also, rural housing guidelines published in 2005 facilitated a continuation of dispersed rural housing growth.

Therefore, while the NSS represented a step forward in the modernisation of spatial planning in Ireland, overall the strategy failed to adequately deliver on its goals. Initially, the NSS was hampered by an inadequate implementation framework as regional and local plans were often poorly integrated or aligned. However, the continued enabling of dispersed, speculative housing development, the subsequent bursting of the housing bubble, and the wider international financial crash unfavourably positioned the NSS as a document out of time and without purpose within an economic crisis and landscape of austerity. Ultimately, national politics shifted towards prioritising a national economic recovery rather than regional balance, thereby consigning the NSS to history.

With a tentative economic recovery underway, a renewed focus on increasing housing supply and an expected population increase of 900,000 people to a population of 5.7m by 2040, once again regional balance provided the backdrop to the preparation of the new National Planning Framework (NPF). The NPF was launched in February 2018 to set out Ireland’s spatial planning strategy for the next 22 years, up to 2040. The NPF clearly demonstrates a degree of reflection on the failures of the NSS. In this sense, a notable difference between the NSS and the new NPF is the focus given to implementation and the legislative instruments underpinning this. Indeed, an entire section of the document (Section 10) is devoted to ‘Implementing the National Planning Framework’. Such implementation is enhanced on the basis of various legislative initiatives introduced since the economic recession began in 2008. These initiatives resulted from a broad consensus that the latitude for easy departure from the provisions of the NSS in advancing local political and economic agendas was partly responsible for the Irish housing buddle. Directly advancing the implementation of the NPF is the *Planning and Development (Amendment) Bill* introduced in 2016, which as noted in the Framework (p.131),

*‘…provides a legislative basis for the National Planning Framework, a monitoring process in relation to its implementation and a statutory requirement for regular reviews and updates into the future, together with the establishment of an independent Office of the Planning Regulator (OPR).*

While the exact roles performed by the OPR are still somewhat vague, and its constitution as yet not fully determined, the NPF envisages that it will advise the Minister for Planning and the government on the implementation of the Framework ‘using a new set of indicators to be developed to assist effective monitoring’ (p.131). This new *Planning and Development (Amendment) Bill* coupled with reforms to planning legislation in 2010 requiring land use zoning at the local authority level to be consistent with regional and national projections, help institute a coordinated hierarchy of measurable projections. In this context, the NPF furnishes phased population growth forecasts based on national census data for each of the three areas covered by the Regional Assemblies (p.132). These predictions thereby supply baseline estimates for the quantitative stipulations of the Regional Economic & Spatial Strategies to be produced by the Regional Assemblies consequent on the Local Government Act 2014. In maintaining vertical coherency through the planning hierarchy, the calculations informing the zoning plans of local and city councils must be consistent with these regional stipulations. This thereby sets the broad demographic envelope within which local authorities must operate, for example calculating local housing need relative to residentially zoned land. Furthermore, the legislative requirement for policy consistency through the cascading hierarchy of provisions from national to regional to local introduced in 2010, means that policy at the local level with regard to, for example apartment size, must conform with national guidance. Failure to respect this hierarchy of policy can result in financial penalties to local authorities consequent on local authority budgets largely relying on funding allocations from central state coffers, and the right of the Minister for Local Government (traditionally also the Minister for Planning) to alter such funding allocations. Moreover, the Minister for Planning also enjoys the facility to amend local authority plans to ensure they accord with national policy.

While this certainly strengthens the prospect for implementation of the NPF’s broad objectives, the vehicle for coordinating such objectives across urban regions remains ambiguously profiled. Here, the NPF acknowledges the need to phase growth in the five Irish cities through sequentially facilitating infill developments. It is asserted that ‘this will be addressed as part of the Metropolitan Strategic Area Plan (MASP) that will be prepared for each city in the context of the Regional Spatial and Economic Strategies’ (p. 132). However, details with respect to the functions, statutory position and authorship arrangements of these MASP documents are not supplied.

Another key difference between the NSS and the NPF is the alignment with the government’s 10-year National Development Plan. This thereby links sectoral infrastructural investments with a spatial planning framework in setting out the government’s spending commitments for the next decade. In this way, it is anticipated by the document’s authors that this will move the NPF beyond an aspirational vision to a framework underpinned by infrastructural commitments and investments that boost regional development.

The language and tone of the NPF also differ markedly from its predecessor. The new document no longer echoes the ESDP discourse and spatial concepts. For example, ‘polycentricity’ and ‘urban-rural partnerships’ do not feature in this second wave of national spatial planning. Whereas the ESDP provided a vocabulary for Irish planners in shifting towards spatial and national planning for the first time, the NPF perhaps reflects a growing capacity among planning policy-makers for adapting spatial planning to the national political and development context. Furthermore, whereas the NSS produced a series of skeletal maps for further elaboration within regional planning strategies, the new framework is very light on representing policy through maps. This reduced role of cartographic representation may be consequent on how an attempt to cartographically illustrated the strategic policy objectives of the NSS in public consultation exercises became a matter of intense political debate. Such mapping helped fracture the government’s national-level political consensus into localised issues that stimulated a drive to incorporate comparatively small and distant settlements into a series of loosely constituted ‘linked-hubs’ and ‘linked-gateways’, which ultimately undermined the viability of the polycentric approach advanced in the document by specifying too many (often tenuously related and competing) settlements as anchor points for regional development. Hence, the NPF adopts a different approach focused on ‘outcomes’ and ‘targets’, rather than the graphic illustration of objectives. For example, section 1.3 of the NPF outlines 10 national strategic outcomes, which if delivered will create ‘shared benefits’ (p. 14) across the country. These include: compact growth; enhanced regional accessibility; strengthened regional economies and communities; sustainable mobility; a strong economy supported by enterprise, innovation and skills; high quality international connectivity; enhanced amenity and heritage; transition to a low carbon and climate resilient society; sustainable management of water, waste and other environmental resources; and access to quality childcare, education and health services. These outcomes are further elaborated through targets as a means of delivery. For example, to achieve more compact urban form, a target of 40% of all new housing is to be delivered within existing built-up areas. Similarly, to accomplish a greater regional balance, the strategy calls for more concentrated growth through a series of proportional targets, such as 50% of future national growth to be concentrated in Ireland’s five largest cities. Both stylistically and in terms of aspiring to selectively concentrate development rather than enabling decentralised growth, this represents a paradigm shift in Irish planning policy; a shift which is discussed below.

**(Re)Balancing Regional, Urban and Rural Development**

As with the earlier NSS, the key tension within the new NPF relates to questions of regional balance and the dominance of Dublin. Following a decade long recession in the wake of the global financial crisis and Irish property market crash, Dublin has been the forerunner in terms of recovery, largely based on its ability to attract inward investment from the IT sector. Within the context of a national economic recovery and projected population increases, some commentators have suggested that a policy direction of regional balance must not hamper the progress of Dublin as Ireland’s primary economic motor (e.g. see O’Neill, 2017). However, within the NPF, moving towards greater regional equity or ‘regional parity’ (p. 26) is posited as the overarching goal within ‘a region-focused strategy for managing growth’ (p. 11). Since the publication of the NSS, Ireland’s regional tier of administration has been rationalised from eight regional authorities to three regional assemblies (Northern & Western, Southern, and Eastern & Midland), each now charged with the preparation of ‘Regional Spatial and Economic Strategies’. The sentiment can be summarised from this extract:

We need to manage more balanced growth between these three regions because at the moment Dublin, and to a lesser extent the wider Eastern and Midland area, has witnessed an overconcentration of population, homes and jobs. We cannot let this continue unchecked … (p. 11).

To deliver this balance, the NPF targets a 50:50 distribution of growth between the Eastern & Midlands Region and the other two regions, with 75% of growth to be targeted outside of Dublin and its suburbs. Given recent trends and business-as-usual projections, these are ambitious targets, suggesting the need for the NPF to ‘disrupt trends that have been apparent for the last 50 years’ (p. 20). These proportional targets provide cascading objectives that translate into demographic growth projections for each region (p. 26).

While the NPF aims for regional balance, the key drivers to deliver this are the four cities outside of Dublin. Indeed, this is a much more focused and selective urban strategy than the previous NSS, aiming to concentrate resources within Ireland’s four largest cities to counterbalance Dublin’s dominance and to provide a focal point for regional development. This is to be achieved through two primary means. Firstly, concentrating resources in the four key regional centres will require not only some constraints to Dublin’s growth, but will also require restraints on dispersed growth within each region to focus resources. Secondly, the NPF explicitly links regional urban growth to a series of ambitious infrastructural and regeneration projects to drive development priorities. These are to be funded through the National Development Plan (NDP) that was published in parallel with the NPF, or are to be enabled through the establishment of a new ‘National Regeneration & Development Agency’ that will work with government departments, agencies and local governing in ‘re-purposing for strategic development purposes’ (p.133) publicly controlled lands in key locations (National Policy Objective 66). This suggests a much more direct and proactive role for the state in the implementation of policy designed to stimulate the wider economy, rather than simply guiding development through traditional forms of largely reactionary land-use planning regulatory tools. Collaboration, rather than competition, among the four regional cities is encouraged with an example given of the emerging Atlantic Economic Corridor, which is attempting to link urban centres on the western seaboard.

The NPF recognises that the Celtic Tiger era house-building boom was characterised by decentralised development, including extended suburbanisation and housing development in rural areas. Much of this housing development was speculative rather than responding to actual demand, leading to oversupply of housing in some rural locations, while many local authorities had over-zoned for housing in areas of low demand, often due to local politics. While the planning orthodoxy in an international context is to promote more compact forms as a more sustainable approach to development, within the NPF compaction is further linked to creating critical mass within the main urban centres to unlock regional development. It remains to be seen how local authorities within Ireland respond to these national objectives, when local politics has generally been pro-development, celebrating physical development as a sign of local economic vibrancy.

<Insert table 2 about here>

The issue of decentralised growth has been particularly contested in relation to future housing growth in rural localities. By western European norms, Ireland has a large rural constituency (approximately 37% of the national population live in settlements of below 1,500 people or in the open countryside), with a strong cultural attachment to living in dispersed rural housing. Substantial rural housing growth during the Celtic Tiger era was widely perceived to undermine the ability of urban centres to attain the critical mass of population growth envisaged with the publication of the NSS. This was compounded with the publication of national planning guidelines for rural housing in 2005 that largely facilitated housing development in exurban locations (see Gkartzios and Scott, 2009 for a wider discussion). Reducing opportunities for new rural housing building appeared to have been addressed in the published ‘draft’ of the NPF, which placed more emphasis on locating new rural development within existing villages, rather than the open countryside, and to limit planning permission for new dispersed rural housing to those with an economic need to live in rural areas. However, this was diluted in the ‘final’ version of the NPF which widened this criterion to demonstrating economic or ‘social need’, which is a much broader interpretation of rural housing needs. It is to this social dimension of the NPF that we now turn.

**(Re)Balancing People, Economy and Place in Development**

One of the notable differences between the NSS and the NPF is the latter’s commendable attention paid to different cohorts in the population: children, the elderly, Travellers (a minority group). The commitment to planning for a diverse and inclusive society, and the championing of the link between planning, health and quality of life are welcome additions to the national planning agenda, and are perhaps recognition of the expanding multiple publics that need to be served by an effective and responsive planning system (Davoudi and Bell, 2016). In this regard, the NPF addresses community and quality of life issues to a much greater extent than the former NSS. While the NSS mentioned the creation of socially balanced and socially diverse communities (p.102 & 104) there was little detail as to what was envisaged by this. However, in the NPF the links between housing, education, health, transport and social inclusion are explicitly recognised. Specifically, national policy objectives are included for: integrating public health policy with planning policy; prioritising walking and cycling in order to encourage healthier choices; ensuring that sectoral polices meet the needs and opportunities of an aging population; prioritising investment in childcare, schools, higher education and life-long learning opportunities; and a broader national policy objective to plan for a more diverse and socially inclusive society. This is indicative of a greater attempt to integrate the spatial element of national planning with policy in other sectoral areas. There is also recognition of the importance of place in people’s quality of life (p.81). However, a closer examination of the policies advanced in the NPF is revealing as it exposes some of the missing elements and contradictions in approaches adopted in many issues. In particular, the sections relating to planning for those with disabilities and Travellers are scant, which is reflective of the traditionally weaker voice minority groups have in the formulation of planning policy in Ireland (Coates et al, 2015).

Moreover, the provisions for children and young people in the NPF suggests contradictions between the framework’s broad aspirations and recent guidance issued by national government for planning authorities. Investment in and strategic planning of childcare and education are considered in the NPF, with greater emphasis on putting in place a more effective childcare planning function at central government level. The importance of continuing to provide facilities for children’s play is specifically mentioned and there is an explicit recognition that planning policy has a role in supporting and delivering national policy and objectives for children and young people (which was not always the case in the past). While this is a more inclusionary approach than the preceding NSS, at the very time that the NPF is highlighting the need for well-located and good quality childcare, the ‘Government Guidelines for Design Standards for New Apartments’ (DHPLG, 2018) are countering this with guidance that one bed apartments should not be considered as contributing to a requirement for childcare, and that in certain locations other larger apartments may also be discounted in considering childcare need. These guidelines also introduce some subtle changes in relation to requirements for play space. There is thus an underlying thrust in detailed planning guidance that certain locations, particularly places where there are a greater number of smaller apartments (city centres), will not be catering to childrens’ and parents’ needs. Hence, it could be argued that this runs counter to the notion of a sustainable, integrated and diverse community. This one issue is illustrative of the contradictions and difficulties of formulating coherent planning policy across different scales in Ireland, and the extent to which the broad provisions of the NPF will be delivered on the ground by the implementation of decisions based on more detailed planning guidance potentially at odds with the strategic direction issued in the NPF.

Set against the backdrop of a housing crisis characterised by high demand and low supply, the section of the NPF dealing with housing is a key component in delivering the high-quality places in cities, towns, villages and rural areas envisaged by the document. While the NSS provided some of the initial thinking on the compact city approach, supplied guidance to encourage sustainable residential development, and introduced the concept of ‘sustainable communities’, it was subsequent housing policy documents and companion guidance documents which fleshed out the broader thinking on sustainable communities and their design and delivery (DoHEHLG, 2005, DoEHLG 2007a, 2007b and 2007c and DoEHLG 2009a, 2009b). The NPF builds on this policy to some extent. Nevertheless, the main thrust in the document is on the actual delivery of housing. Thus, it is location, building resilience, reusing stock, increasing densities, facilitating infill development and increased building heights that take centre stage in relation to housing – an emphasis on quantity of new housing over place quality. Other key housing policy components are an emphasis on having a more robust evidence base to project housing requirements and a stipulation that each local authority will undertake a Housing Needs Demand Assessment. However, there is little evidence of a maturing or deepening of the idea of sustainable communities. Accordingly, it is advocated that diverse neighbourhoods with a balance of public and private housing create the healthiest communities, although such social mixing arguments are not always substantiated in the research literature (Russell and Redmond, 2009). Hence, engagement with the conclusions of nuanced research into the creation and consolidation of sustainable communities is eschewed in favour of intuitively grounded knowledge claims presented as truisms that advance conventional remedies to long-standing problems that remain largely unresolved by such traditional approaches. In this context, it seems wise that the authors of the document move beyond merely quantitative assessments of housing need, to employing available research to inform evidence-based approaches that respond to such ‘need’ in a way that does not merely answer numerical ‘demand’ but also delivers on complex qualitative issues surrounding ‘quality’.

The emphasis on delivering housing in compact urban form is also the rationale used for one of the most significant shifts signified in the NPF in relation to the approach to managing development in an Irish context. Notably, there is a clear signal in the document of a move away from the long-established use of universal development standards and indeed zoning, to ‘Performance Based Design Standards’. Here, the section devoted to Performance Based Standards (p.67) signals a move from a more prescriptive approach (specific standards and land use zoning) to what is described as a more ‘dynamic’ performance based approach. This illustrates a further step to create greater regulatory flexibility for developers in the Irish planning system. Such a potential sea change is indicated in the vaguest of terms, as the document refers to standards being ‘subject to a range of tolerance’ and how ‘planning standards should be flexibly applied in response to well-designed development proposals’ (p.67). However, research from other jurisdictions has shown that Performance Based Systems have mixed outcomes, and often lead to more complexity rather than less (Baker *et al* 2006, BuckleyVann, 2016). Thus, it remains to be seen if this more flexible approach to development will deliver the desired effect of increasing housing delivery and development that is more responsive to its context, or if there will be a raft of unintended consequences, poorer rather than higher quality development, and a slowdown in delivery, given that developers themselves value certainty.

**(Re)Balancing the Environment and Heritage with Development**

The emergence of climate change as a key issue of concern in planning is broadly reflected in the NPF. Hence, the policy direction given in the document echoes that outlined in the National Mitigation Plan and the National Adaptation Framework, both of which envision a ‘transition to a low carbon and climate resilient society’ (p.15). In this context, the NPF allocates a considerable volume of text to managing CO2 emissions, with a particular focus on the role of an energy transition through an enhanced role for renewable energy technologies. However, such policy direction is set against a backdrop of ongoing controversy regarding the outdated nature of national policy on windfarm development. Hence, the NPF may well represent a lost opportunity to specify an objective for the production of clearer guidance on the location of future renewable energy technology installations that would advance the delivery of the envisaged energy transition ‘on the ground’. This fudging of a difficult issue is likewise reflected in the failure to tackle the ‘elephant in the room’ concerning Irish emissions regulation: the fact that agriculture is the sector in Ireland that is responsible for the majority of greenhouse gas emissions. Set against this backdrop, the NPF fully endorses the ‘Food Wise 2025’ strategy for the growth of the agri-food and seafood sectors (p.76). Hence, to square a difficult circle the NPF avoids a politically unpalatable environmental issue by advancing a reduction in CO2 emissions ‘of at least 80% (compared to 1990 levels) by 2050 across the electricity, built environment and transport sectors’, while implying an agricultural exceptionalism, wherein the reductions made in all other sectors will be complemented by ‘an approach to carbon neutrality in the agriculture and land-use sector, including forestry, which does not compromise capacity for sustainable food production’ (p.119). As such, construing ‘balance’ in the context of emissions management seems set in a long-established approach of promoting agricultural intensification with consequent emissions increases concurrent to a strategy of decreasing emissions in all other economic sectors. Unfortunately, this hybrid strategy of low-carbon transitioning in several sectors and high-carbon intensification in the main emitting sector, may well create a zero-sum approach that undermines the vision of progress being promulgated.

Perhaps one of the greatest limitations of the NPF is the lack of ambition demonstrated to conserving Ireland’s biodiversity. While the word ‘biodiversity’ is peppered throughout various sections of the document, the section which addresses it directly is devoid of vision and initiative. Here, the protection of biodiversity is primarily referenced, and thereby spatially confined to, sites designated under European Union legislation, specifically the Habitats and Birds Directives (p.126). Interestingly, ‘Natural Heritage Areas’ designated under the nation’s Wildlife Acts are not referenced, nor is the National Biodiversity Action Plan, which was ostensibly produced as the guiding strategy for the conservation of biodiversity in Ireland. Consequently, the NPF presents a vague ‘National Policy Objective’ to ‘Conserve and enhance the rich qualities of (sic) natural and cultural heritage of Ireland in a manner appropriate to their significance’ (p.126). Accordingly, it is difficult to conclude that the conservation of Ireland’s biodiversity is a key concern of the framework. Similarly, the fate of ‘landscape’ as an issue of planning importance is thriftily handled, with just a few sentences of discussion and the inclusion of a large image to fill the space where one would have expected a clear policy direction to be elaborated (p.127). Where innovation has been shown is in the introduction of a discussion and policy on ‘green infrastructure’ (GI). Although GI is left undefined and there is a limited scope of issues encompassed in the narrative explanation of how it could be used, the NPF includes a specific direction in National Policy Objective 58 that instructs local planning authorities to integrate planning for GI and ecosystems services into the preparation of land use plans. Hence, the NPF advances what in many local authorities will be a novel way of thinking about and planning for green and blue spaces. Nonetheless, considered in the context of the foregoing critique of the approach adopted to biodiversity and landscape, it is somewhat of a lost opportunity that the NPF did not seek to better ‘spatialise’ the conservation of species and landscapes through its promotion of the GI approach. In particular, this would have helped counter the ‘ghettoising’ of biodiversity conservation to the management of national parks and EU designated sites by threading multifunctional green and blue spaces through the broader landscape to provide connectivity and mutual benefits for people, non-human species and the wider environment (Clabby, 2016).

**(Re)Conceiving Planning for the Twenty-First Century**

The NPF represents a significant advancement on its predecessor, the NSS, by deepening the reach of planning policy, broadening the matters addressed and extending the integration of an array of topics pertinent to the multitude of issues that contemporary planning is charged with managing. In this sense, the NPF further entrenches a shift towards strategic spatial planning away from traditional land-use regulation. Moreover, synchronising the publication and implementation of the NPF with the NDP is a logical initiative, in that it helps to ensure that the policies advanced in the framework are underpinned by a funding stream to facilitate their implementation. However, on reviewing the connections between the documents it is not entirely certain that the relationship is equal. Indeed, the review presented above suggests that while there is much to commend in the NPF, it is fashioned as an implementation vehicle for the priorities of the NDP, rather than as a framework for even-handed mediation between a host of interacting issues, including guiding the investment decisions contained in the NDP. The NPF is framed as a ‘strategy for managing growth’ (p. 11), with significant emphasis placed on enhancing private sector housing supply and developer friendly delivery. In part, this reflects a wider story of the nascent national economic recovery following the financial crisis of 2007/08; however, it also reflects a more longstanding pro-development political culture and neoliberal drift (Scott et al., 2013) which has framed planning policy over the last 15-20 years. Consequently, the constitution of ‘balance’ advanced in the NPF is one weighted heavily in favour of economic development, with a notable restraining of attention allocated to the issues of nature conservation and landscape. Thus, while planning is ultimately justified by advancing the ‘public interest’ through finding balance between the oft-contending interests of society, economy and environment, the form of balance advanced in the NPF is one which recalibrates planning activity as development enablement. This reflects a broader move in recent years to recast the Irish planning system as more ‘developer friendly’ through an array of central-state initiated mechanisms to streamline planning (e.g. the Strategic Infrastructure Act) (Fox-Rogers et al., 2011) and reduce standards perceived as onerous to development capital (e.g. Revised Apartment Size Guidelines). Seen in this light, the NPF further pushes Irish planning practice right-of-centre and into a new equilibrium wherein the ‘public interest’ is measured against successful growth facilitation rather than development management. In particular, the NPF reconceives the role of planning from one of coordination to being a key agent in the delivery of strategic economic objectives within a system of ‘performance based design standards’ and quantified targets. However, in a context of local authority resource constraints where the range of issues planners are tasked to manage continues to expand, this paradigm shift in how planning is to be conducted may fundamentally recalibrate planning activity, such that undertaking work which achieves quantified targets is prioritised over tackling complex qualitative issues like advancing inclusive place-making initiatives, which require long-term commitment, broad stakeholder participation and the fostering of relationships not easily captured by quantifiable metrics. Thus, written between the lines of the NPF is a different future for planning in Ireland.

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